

# **RESETTLEMENT ACTION PLAN (RAP) AND LIVELIHOOD RESTORATION PLAN**

## **UNDER THE PROJECT**

**CONSTRUCTION AND OPERATION OF A SOURCE-SEPARATED  
ORGANIC WASTE COMPOSTING PLANT, JAMESTOWN, ACCRA**



**DATE: 30<sup>TH</sup> APRIL 2026**

**PROONENT: ACCRA METROPOLITAN ASSEMBLY (AMA)**

## DECLARATION

This RAP/LRP commits the Project Proponent to:

- Restore and improve livelihoods of economically displaced persons
- Implement a transparent and accessible Grievance Redress Mechanism (GRM)
- Ensure inclusive participation, particularly of vulnerable groups
- Undertake monitoring, evaluation, and completion audit in line with AfDB OS5

## APPROVAL & SIGN-OFF PAGE

This Resettlement Action Plan (RAP) and Livelihood Restoration Plan (LRP) for the Construction and Operation of the Source-Separated Organic Waste Composting Plant in Jamestown, Accra has been prepared in accordance with the applicable laws of the Republic of Ghana and requirements of the African Development Bank (AfDB) Integrated Safeguards System (ISS, 2023), specifically Operational Safeguard 5 (OS5). The RAP/LRP has been reviewed and approved by the relevant institutions and represents a commitment to ensure that all Project Affected Persons (PAPs) are treated fairly, compensated at full replacement cost, and supported to restore or improve their livelihoods.

### **Prepared by**

**ESG Partners Limited**

Environmental and Social Consultancy Firm

## ACRONYMS AND ABBREVIATIONS

| Acronym       | Full Meaning                                                                                      |
|---------------|---------------------------------------------------------------------------------------------------|
| <b>AFDB</b>   | African Development Bank                                                                          |
| <b>AMA</b>    | Accra Metropolitan Assembly                                                                       |
| <b>AoI</b>    | Area of Influence                                                                                 |
| <b>CBD</b>    | Central Business District                                                                         |
| <b>CGSC</b>   | Community Grievance and Surveillance Committees                                                   |
| <b>CSIR</b>   | Council for Scientific and Industrial Research                                                    |
| <b>CSO</b>    | Civil Society Organization                                                                        |
| <b>DOVVSU</b> | Domestic Violence and Victims Support Unit                                                        |
| <b>EOI</b>    | Expression of Interest                                                                            |
| <b>EPA</b>    | Environmental Protection Authority                                                                |
| <b>ESG</b>    | Environmental Social Governance                                                                   |
| <b>ESIA</b>   | Environmental and Social Impact Assessment                                                        |
| <b>ESMP</b>   | Environmental and Social Management Plan                                                          |
| <b>ESPA</b>   | Environmental Service Providers Association                                                       |
| <b>GARCC</b>  | Greater Accra Regional Coordinating Council                                                       |
| <b>GBV</b>    | Gender-Based Violence                                                                             |
| <b>GIZ</b>    | Deutsche Gesellschaft für Internationale Zusammenarbeit                                           |
| <b>GNFS</b>   | Ghana National Fire Service                                                                       |
| <b>GPS</b>    | Global Positioning System                                                                         |
| <b>GRM</b>    | Grievance Redress Mechanism                                                                       |
| <b>GSS</b>    | Ghana Statistical Service                                                                         |
| <b>ICGC</b>   | International Central Gospel Church                                                               |
| <b>IFC</b>    | International Finance Corporation                                                                 |
| <b>IRECOP</b> | Integrated Recycling and Compost Plant Limited                                                    |
| <b>ISP</b>    | Informal Service Providers                                                                        |
| <b>ISS</b>    | Integrated Safeguards System (AfDB, 2023)                                                         |
| <b>KBTH</b>   | Korle-Bu Teaching Hospital                                                                        |
| <b>KPI</b>    | Key Performance Indicators                                                                        |
| <b>LI</b>     | Legislative Instrument                                                                            |
| <b>LRP</b>    | Livelihood Restoration Plan                                                                       |
| <b>MMDA</b>   | Metropolitan, Municipal and District Assemblies                                                   |
| <b>MSW</b>    | Municipal Solid Waste                                                                             |
| <b>NGO</b>    | Non-Governmental Organization                                                                     |
| <b>OS</b>     | Operational Safeguard 5 (Land Acquisition, Restrictions on Land Use and Involuntary Resettlement) |
| <b>PAP</b>    | Project Affected Person                                                                           |
| <b>PCU</b>    | Project Coordination Unit                                                                         |
| <b>PRCC</b>   | Public Relations and Complaints Committee                                                         |

| <b>Acronym</b> | <b>Full Meaning</b>                               |
|----------------|---------------------------------------------------|
| <b>PWD</b>     | Persons with Disabilities                         |
| <b>RAP</b>     | Resettlement Action Plan                          |
| <b>RBF</b>     | Results-Based Financing                           |
| <b>SEA</b>     | Sexual Exploitation and Abuse / Sexual Harassment |
| <b>SH</b>      | Sexual Harassment                                 |
| <b>SMS</b>     | Short Message Service                             |
| <b>SOP</b>     | Standard Operating Procedures                     |
| <b>SWCES</b>   | Single Window Citizen Engagement Service          |
| <b>ToR</b>     | Terms of Reference                                |
| <b>USD</b>     | United States Dollars                             |
| <b>WRI</b>     | Water Research Institute                          |

## GLOSSARY OF KEY TERMS

This glossary defines key terms used in this RAP/LRP in line with AfDB Operational Safeguard 5 (OS5) and international good practice. It ensures clarity, consistency, and shared understanding among all stakeholders involved in RAP implementation.

| Term                                     | Definition                                                                                                                                         | Application in this RAP                                                                                                   |
|------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|
| <b>Project Affected Persons (PAPs)</b>   | Individuals, households, or groups affected by the project through loss of assets, access, or livelihoods, regardless of legal land tenure status. | Includes scrap dealers, waste pickers, informal workers, and support-service providers operating on the AMA site.         |
| <b>Economic Displacement</b>             | Loss of income sources or livelihood due to project impacts such as land use change or restricted access to resources.                             | Primary impact of the project, affecting informal waste-sector actors reliant on site-based activities and waste streams. |
| <b>Physical Displacement</b>             | Loss of shelter or relocation resulting from project activities.                                                                                   | Limited to temporary and semi-permanent structures such as sheds, kiosks, and containers.                                 |
| <b>Replacement Cost</b>                  | The full cost of replacing an asset without depreciation, including materials, labour, transport, and transaction costs.                           | Used for compensating affected structures to ensure PAPs can rebuild without financial loss.                              |
| <b>Cut-off Date</b>                      | The date after which new occupants or activities are not eligible for relocation or assistance.                                                    | Established during the census, publicly disclosed, and enforced to prevent opportunistic claims.                          |
| <b>Livelihood Restoration</b>            | Measures to ensure PAPs restore or improve income and living standards after displacement.                                                         | Includes relocation support, business re-establishment, skills training, and market linkages.                             |
| <b>Entitlement</b>                       | The relocation and assistance package a PAP is eligible for based on impact type and category.                                                     | Defined in the Entitlement Matrix covering structures, relocation, and livelihood support.                                |
| <b>Vulnerable Groups</b>                 | Individuals or groups with limited capacity to cope with displacement impacts.                                                                     | Not formally identified in census, but contingency provisions exist for emerging vulnerability cases.                     |
| <b>Grievance Redress Mechanism (GRM)</b> | A structured system for receiving, addressing, and resolving complaints.                                                                           | Multi-tiered system ensuring accessible, transparent, and timely dispute resolution.                                      |

| <b>Term</b>                              | <b>Definition</b>                                                                  | <b>Application in this RAP</b>                                                                                    |
|------------------------------------------|------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|
| <b>Area of Influence (Aoi)</b>           | The geographic area affected by the project, directly or indirectly.               | Includes project footprint and surrounding areas impacted by livelihood disruption and waste value chain changes. |
| <b>Livelihood Restoration Plan (LRP)</b> | A structured plan to restore or improve livelihoods of PAPs.                       | Focuses on economic recovery through relocation, integration, and business support.                               |
| <b>Full Replacement Cost Principle</b>   | Compensation standard requiring full asset replacement without depreciation.       | Applied to all compensable structures under this RAP.                                                             |
| <b>Completion Audit</b>                  | Independent evaluation confirming RAP implementation outcomes.                     | Verifies relocation, and livelihood restoration effectiveness.                                                    |
| <b>Resettlement Action Plan (RAP)</b>    | A plan outlining measures to address displacement impacts.                         | Provides framework for relocation, livelihood restoration, and monitoring.                                        |
| <b>Informal Occupants</b>                | Individuals using land without legal title but with established economic activity. | Scrap dealers and operators on AMA land qualify under this category.                                              |
| <b>Business Inventory</b>                | Goods or materials used for income generation.                                     | Scrap materials are treated as business inventory and relocated, not cash compensated.                            |
| <b>Transitional Support</b>              | Temporary assistance provided during disruption periods.                           | Triggered if relocation is delayed beyond six months.                                                             |
| <b>Stakeholder Engagement</b>            | Ongoing consultation and communication with affected and interested parties.       | Ensures PAP participation in planning, implementation, and monitoring.                                            |
| <b>Relocation Site<sup>1</sup></b>       | Designated alternative location for PAPs.                                          | Must be prepared, serviced, and operational before displacement.                                                  |

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<sup>1</sup> A joint visit and inspection of the proposed relocation site was conducted on Friday the 26<sup>th</sup> of June 2026. The team comprised of representatives of the Borrower (AMA and GIZ) and the Bank E&S Specialists. The objective was to establish the location of the site and verify that it was free of any encumbrances. The team observed that the site was adjacent to the proposed project location and was currently being used as a refuse dump site. No inhabitants were observed but several waste collectors were seen picking and dumping waste. The AMA official indicated that, like the proposed project location, the relocation site is the property of the AMA and affirmed that the decision to relocate the scrap dealers there had been authorized by the Chief Executive, acting on behalf of the Government of Ghana.

| <b>Term</b>                                | <b>Definition</b>                                                                                                                                                                                                                     | <b>Application in this RAP</b>                                                                                                              |
|--------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Compensation</b>                        | Payment or in-kind support for loss of assets.                                                                                                                                                                                        | Applies to structures and verified relocation-related damages.                                                                              |
| <b>In-kind Compensation</b>                | Non-cash compensation such as provision of replacement structures or land.                                                                                                                                                            | AMA may construct replacement structures instead of cash payments.                                                                          |
| <b>Census</b>                              | Enumeration of PAPs and their assets.                                                                                                                                                                                                 | Forms the basis for eligibility and entitlement determination.                                                                              |
| <b>Asset Inventory</b>                     | Detailed listing of affected assets.                                                                                                                                                                                                  | Includes structures, business assets, and access-related losses.                                                                            |
| <b>Eligibility Criteria</b>                | Conditions determining qualification for compensation or assistance.                                                                                                                                                                  | Based on census and cut-off date.                                                                                                           |
| <b>Monitoring and Evaluation (M&amp;E)</b> | Continuous tracking of RAP implementation and outcomes.                                                                                                                                                                               | Ensures compliance and livelihood restoration success.                                                                                      |
| <b>Project Coordination Unit (PCU)</b>     | Dedicated unit responsible for RAP implementation oversight.                                                                                                                                                                          | Coordinates compensation, relocation, GRM, and reporting.                                                                                   |
| <b>Relocation Assistance</b>               | Support provided to move PAPs and assets.                                                                                                                                                                                             | Includes transport, logistics, and setup support.                                                                                           |
| <b>Livelihood Continuity</b>               | Ability of PAPs to maintain income-generating activities post-relocation.                                                                                                                                                             | Central objective of RAP and LRP.                                                                                                           |
| <b>Integration into Formal Systems</b>     | Inclusion of informal actors into structured systems.                                                                                                                                                                                 | PAPs may be integrated into formal waste management value chains.                                                                           |
| <b>Market Linkage Support</b>              | Assistance to reconnect PAPs to buyers and suppliers.                                                                                                                                                                                 | Ensures continuity of scrap trading and related activities.                                                                                 |
| <b>Vulnerable Group<sup>2</sup></b>        | . Vulnerable groups are individuals or populations who may be disproportionately affected by project impacts due to greater exposure to risks, higher sensitivity, or limited capacity to cope with and recover from adverse effects. | Require targeted consultation and tailored support measures for vulnerable groups identified women, youth, very low-income informal workers |

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<sup>2</sup> Vulnerability is not an inherent characteristic of people and does not occur in a vacuum. Women, for instance, are not inherently more vulnerable than men; but discrimination, entrenched social roles and attitudes, poverty, and lack of access to decision-making can weaken their resilience and render them vulnerable to project risk and adverse impacts. Vulnerability is thus context-specific and is to be understood through the interplay of three factors: (i) exposure to risk and adverse impacts; (ii) sensitivity to those risks and impacts; and (iii) adaptive capacity.



## COMPENSATION SUMMARY SHEET

| # | Variables                               | Response /Date                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|---|-----------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   | <b>A. General</b>                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 1 | Region/Province/Department              | Greater Region -Ghana                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 2 | Municipality/District                   | Accra Metropolitan Assembly (AMA)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 3 | Village/Suburb                          | Jamestown/ Within the Ashiedu Keteke Sub-Metropolitan Area                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 4 | Activity(ies) that trigger resettlement | <p>The priority is not residential resettlement but business relocation. Thus, activities that triggered economic resettlement are business relocation, which will lead to the following risk:</p> <ul style="list-style-type: none"> <li>• loss of business operating space;</li> <li>• disruption of scrap dealing and waste-related livelihoods;</li> <li>• removal or relocation of temporary structures;</li> <li>• disruption of access to waste materials;</li> <li>• temporary loss of income during relocation;</li> <li>• disruption of customer and supplier networks.</li> </ul> |
| 5 | Project overall cost                    | \$200,000                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 6 | Overall resettlement / relocation cost  | \$150,000                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 7 | Applied cut-off date (s)                | 8 <sup>th</sup> of May 2026 <sup>3</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

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<sup>3</sup> The cut-off date of **8 May 2026** was intentionally established after completion of the draft RAP report to allow for the any final validation and disclosure process with Project Affected Persons (PAPs) and other stakeholders. The RAP document was substantially completed on 30 April 2026; however, the consultants and project team waited for any stakeholder concerns after which the cut-off date was formally communicated and adopted.

This approach was taken to ensure that:

1. All PAPs identified during the census and validation process were provided an opportunity to review and confirm their records before the cut-off date became effective.
2. The cut-off date was publicly disclosed and understood by PAPs and community stakeholders, consistent with AfDB Operational Safeguard 5 (OS5) requirements on transparency and stakeholder engagement.
3. Any legitimate omissions, corrections, or verification issues identified during the final consultation process could be addressed before eligibility was formally closed.
4. The cut-off date serves as the administrative date for determining eligibility for compensation and assistance and does not necessarily have to coincide with the date of preparation of the RAP report. Rather, it should be linked to the completion of PAP verification and disclosure activities.

To avoid confusion, the RAP will be revised to clarify that 30 April 2026 represents the date of completion of the draft RAP report, while 8 May 2026 represents the officially disclosed and adopted cut-off date following stakeholder validation and confirmation of the PAP database.

| #  | Variables                                                           | Response /Date                                                                                     |
|----|---------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|
| 8  | Dates of consultation with the people affected by the project (PAP) | 9 <sup>th</sup> April 2026<br>7 <sup>th</sup> May 2026                                             |
| 9  | Dates of the negotiations of the compensation rates / prices        | There was no compensation rate rather AMA agreed to bearing the relocation cost                    |
|    | <b>B. Specific information</b>                                      |                                                                                                    |
| 10 | Number of people affected by the project (PAP)                      | 104 PAPs                                                                                           |
| 11 | Number of Physically displaced                                      | Non                                                                                                |
| 12 | Number of economically displaced                                    | 104                                                                                                |
| 13 | Number of affected households                                       | NA                                                                                                 |
| 14 | Number of females affected                                          | 7                                                                                                  |
| 15 | Number of vulnerable affected                                       | 7                                                                                                  |
| 16 | Number of major PAP                                                 | 97                                                                                                 |
| 17 | Number of minor PAP                                                 | 7 <sup>4</sup>                                                                                     |
| 18 | Number of total right-owners and beneficiaries                      | 104                                                                                                |
| 19 | Number of households losing their shelters                          | NA                                                                                                 |
| 20 | Total area of lost arable/productive lands (ha)                     | NA                                                                                                 |
| 21 | Number of households losing their crops and/or revenues             | NA                                                                                                 |
| 22 | Total areas of farmlands lost (ha)                                  | NA                                                                                                 |
| 23 | Estimation of agricultural revenue lost (USD)                       | NA                                                                                                 |
| 24 | Number of buildings to demolish totally                             | No block or structure to be demolished just shelter that will be replaced at the alternative site. |
| 25 | Number of buildings to demolish totally at 50%                      | Non                                                                                                |
| 26 | Number of buildings to demolish totally at 25%                      | No                                                                                                 |
| 27 | Number of tree-crops lost                                           | No                                                                                                 |
| 28 | Number of commercial kiosks to demolish                             | Non                                                                                                |

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This clarification will be incorporated into Sections 5.5.2, 8.3, and 9.2 of the RAP to ensure consistency throughout the document.

<sup>4</sup> Food vendors and small support service providers

| #   | Variables                                                                 | Response /Date |
|-----|---------------------------------------------------------------------------|----------------|
| 29  | Number of ambulant/street sailors affected                                | Non            |
| 30  | Number of community-level service infrastructures disrupted or dismantled | Non            |
| 31  | Number of households whose livelihood restoration is at risk              | Non            |
| ... |                                                                           |                |

## EXECUTIVE SUMMARY

This Resettlement Action Plan (RAP) and Livelihood Restoration Plan (LRP) has been prepared for the Construction and Operation of the Source-Separated Organic Waste Composting Plant in Jamestown, Accra, implemented by the Accra Metropolitan Assembly (AMA) with support from the African Development Bank (AfDB). The project is located on approximately 1.77 hectares of public land under AMA jurisdiction in Jamestown, within the Ashiedu Keteke Sub-Metropolitan Area. The project seeks to improve municipal solid waste management, promote source separation, reduce organic waste disposal at landfills, produce compost, reduce methane emissions, and support Accra's circular economy and climate resilience agenda. The Environmental and Social Impact Assessment (ESIA) confirmed that the project will generate significant environmental and public health benefits. However, it will also affect informal economic activities currently taking place within the project footprint. These include scrap dealing, waste picking, informal recycling, dismantling, sorting, and small-scale support services. Although the land is publicly owned by AMA and no compulsory acquisition of privately owned land is required, the project will cause economic displacement through loss of access to business space, waste streams, structures, and income-generating activities. This RAP/LRP has therefore been prepared to ensure that affected persons are identified, consulted, compensated where applicable, relocated to a prepared alternative site, and supported to restore or improve their livelihoods in accordance with AfDB Integrated Safeguards System (ISS, 2023), particularly Operational Safeguard 5 (OS5).

### **Purpose and Objectives of the RAP/LRP**

The main purpose of this RAP/LRP is to provide a practical and implementable framework for managing economic displacement and livelihood restoration associated with the project.

The specific objectives are to:

1. avoid or minimize displacement where feasible;
2. identify and enumerate all Project Affected Persons (PAPs);
3. establish eligibility criteria and entitlement packages;
4. compensate affected structures at full replacement cost, as applicable;
5. relocate PAPs to a prepared alternative site;
6. restore and, where possible, improve livelihoods;
7. establish an accessible Grievance Redress Mechanism (GRM);
8. define institutional, financial, monitoring, and implementation arrangements.

The guiding principle is that no PAP should be made worse off as a result of the project.

### **Legal and Institutional Framework for Resettlement**

The RAP/LRP is guided by Ghanaian legislation and AfDB safeguard requirements. Key national instruments include the 1992 Constitution of Ghana, the Lands Act, 2020 (Act 1036), and the Environmental Protection (Environmental Assessment) Regulations, 2025 (L.I. 2504). The project site is public land under AMA jurisdiction. Therefore, compensation for land acquisition is not applicable in the same way it would be for privately owned land. However, informal users occupying the site have structures, operational assets, business inventory, and livelihoods that will be affected. These impacts require mitigation.

Under Ghana's Land Act, 2020 (Act 1036) and associated Limitation Act (NRCD 54), the right to compensation for squatters depends on whether they have acquired legal title through adverse possession (12+ years of continuous, uninterrupted, hostile occupation) or if they are considered "occupiers in good faith" whose improvements are being acquired.

Key Aspects of Squatter Rights and Compensation:

- **Adverse Possession (12-Year Rule):** If a squatter occupies private land for 12 years or more without interruption, the original owner's right to recover the land is barred. At this point, the squatter may become the legal owner and could be entitled to compensation if the state later acquires that land.
- **Public Land Exception:** The Land Act, 2020 (Act 1036) explicitly removes the ability of a squatter to acquire title to public land by adverse possession, regardless of the duration of their occupation.
- **Compensation for Improvements:** If a squatter is evicted, they generally do not have a right to compensation for the land itself if they have not met the 12-year threshold. However, in cases of compulsory acquisition, they may be compensated for structures, investments, and other assets (improvements) they built on the land, particularly if they can prove they were in "good faith".
- **No Compensation for Short-term Trespassers:** A person who has been on the land for less than 12 years (a mere trespasser) has no legal right to compensation.

However, the AfDB OS5 applies because the project will cause economic displacement. OS5 recognizes that people without formal land title may still be eligible for assistance where they lose access to assets, resources, or livelihoods. Where national law and AfDB requirements differ, the higher standard applies. This means:

- compensation must be at full replacement cost;
- depreciation must not be deducted;
- informal and non-title holders must be assisted;
- livelihood restoration is mandatory;
- monitoring and completion audit are required.

### **Linkage with the ESIA**

The RAP/LRP is directly linked to the ESIA. The ESIA identified the project footprint, existing land use, informal economic activities, potential disruption of waste value chains, and the likelihood of economic displacement. It therefore recommended preparation of a RAP/LRP to address impacts on informal operators and livelihood systems. The RAP/LRP operationalizes the ESIA commitments by providing:

- PAP identification and census;
- asset inventory;
- eligibility and entitlement framework;
- compensation and relocation approach;
- livelihood restoration measures;
- stakeholder engagement;
- grievance redress;
- monitoring and completion audit.

The RAP is therefore the operational bridge between ESIA impact identification and actual implementation of mitigation measures.

### **Project Description and Resettlement Triggers**

The project involves the construction and operation of a composting plant for source-separated organic waste. Key components include:

- waste reception and sorting areas;
- composting and curing zones;
- storage and packaging areas;
- internal access roads;
- drainage and leachate management systems;
- supporting utilities and operational infrastructure.

The key activities triggering resettlement impacts are:

- site clearance;
- removal and relocation of informal operators;
- restriction of access to business space;
- restriction or reorganization of access to waste streams;
- formalization of waste management systems.

The main form of displacement is economic displacement. Physical displacement is limited and relates mainly to temporary business structures, sheds, kiosks, containers, and makeshift operational spaces. No residential displacement is anticipated.

### **Main Socio-Economic Characteristics of the PAPs Working Areas**

The project is located in Jamestown within the Ashiedu Keteke Sub-Metropolitan Area of Accra, one of the oldest and most densely populated urban settlements in Ghana. The area is characterized by high levels of informal economic activity, mixed land use, inadequate infrastructure, limited formal employment opportunities, and strong dependence on daily income-generating activities. The project footprint currently supports an active informal waste economy comprising scrap dealing, dismantling, sorting, recycling, waste picking, loading services, transportation support, and small-scale trading activities.

The proposed Source-Separated Organic Waste Composting Plant presents significant opportunities for improved municipal waste management, reduced environmental pollution, greenhouse gas emission reduction, compost production, job creation, and integration of informal actors into a more structured waste management system. However, the project also presents socio-economic risks, primarily associated with the disruption of existing livelihoods that depend on access to the project site and waste streams. Key risks include temporary loss of income, disruption of business operations, interruption of established customer and supplier networks, reduced access to recyclable materials, and potential livelihood decline if relocation and livelihood restoration measures are not effectively implemented.

The socio-economic assessment confirmed that the affected population relies heavily on site-based economic activities and daily cash flows, making livelihood restoration and business continuity critical components of the RAP.

### Land Status and Tenure Regime

The proposed project site covers approximately 1.77 hectares of land under the ownership and jurisdiction of the Accra Metropolitan Assembly (AMA). The land is public land and is not subject to compulsory acquisition from private landowners. The current occupants are primarily informal users and operators who have established economic activities on the site but do not possess formal legal title, leasehold rights, or recognized ownership interests in the land.

Although the PAPs do not have legal ownership rights over the land, they have established businesses, structures, business inventory, operational assets, and economic dependence on the site. In accordance with AfDB Operational Safeguard 5 (OS5), these PAPs are eligible for assistance, relocation support, livelihood restoration measures, and compensation for eligible structures and improvements, notwithstanding the absence of formal land tenure rights.

### Profile of Project Affected Persons (PAPs)

The census and socio-economic survey identified a total of 104 Project Affected Persons (PAPs) who derive their livelihoods directly or indirectly from activities conducted within the project area of influence. The PAPs consist predominantly of scrap dealers who own and operate scrap collection, storage, sorting, dismantling, and trading businesses within the site. Additional PAP categories include waste pickers, informal workers such as loaders and dismantlers, and traders providing food and support services to site users.

The PAP profile is summarized as follows:

| PAP Category                        | Number     | Characteristics                                                                           |
|-------------------------------------|------------|-------------------------------------------------------------------------------------------|
| Scrap Dealers                       | 90         | Primary operators with business inventory, equipment, storage areas and customer networks |
| Waste Pickers                       | 3          | Individuals dependent on access to recyclable materials and waste streams                 |
| Informal Workers                    | 4          | Loaders, dismantlers, assistants and casual labourers dependent on daily wages            |
| Traders / Support Service Providers | 7          | Food vendors and ancillary service providers supporting site operations                   |
| <b>Total</b>                        | <b>104</b> | Economically displaced persons requiring relocation and livelihood restoration support    |

The census also identified formally classified vulnerable groups requiring special assistance at the time of assessment. The RAP includes a vulnerability screening and contingency support mechanism to identify and assist any vulnerable individuals that may emerge during implementation.

Overall, the project's primary social impact is economic displacement rather than physical displacement. Consequently, the RAP focuses on business relocation, protection of productive assets, restoration of income sources, continuity of economic activities, and integration of PAPs into a more organized and sustainable waste management system – all of which associated costs are to be fully borne by the project proponent (Accra Metropolitan Assembly).

### **Social and Economic Impacts of the Project on Affected Persons**

The proposed Source-Separated Organic Waste Composting Plant will be developed on approximately 1.77 hectares of land within the Jamestown/Ashiedu Keteke area of Accra. The land falls under the ownership and management of the Accra Metropolitan Assembly (AMA) and is currently occupied by informal economic operators who utilize the site for scrap trading, recycling, dismantling, waste recovery, storage, and related support services. Although the affected persons do not possess formal ownership rights over the land, they have established economic activities and livelihood systems that are directly dependent on the site.

Jamestown and the wider Ashiedu Keteke area represent one of the oldest and most densely populated urban settlements in Accra. The area is characterized by mixed land use, high levels of informality, inadequate urban infrastructure, limited access to formal employment opportunities, and significant dependence on daily income-generating activities. The local economy is driven largely by small-scale enterprises, informal trading, waste recovery activities, transport services, artisanal work, and other micro-enterprises that provide livelihoods for a large segment of the population.

The project site currently functions as an important economic hub within the informal waste and recycling value chain. Activities undertaken on the site include:

- Scrap metal collection, aggregation, and trading;
- Vehicle dismantling and recovery of reusable parts;
- Sorting and processing of recyclable materials;
- Waste picking and recovery of valuable materials from waste streams;
- Temporary storage of scrap materials and equipment;
- Informal transportation and loading services;
- Small-scale trading and support services.

The census and socio-economic survey identified a total of 104 Project Affected Persons (PAPs) who derive all or part of their livelihoods from activities undertaken within the project footprint. These PAPs comprise scrap dealers, waste pickers, informal workers, dismantlers, transport operators, and traders who are economically linked through a network of suppliers, buyers, processors, and customers.

The socio-economic assessment revealed varying levels of economic vulnerability among PAPs. Most PAPs operate within the informal sector with limited savings, limited access to formal credit, and a high dependence on daily cash flow for household survival. Consequently, even short-term disruptions to business operations may significantly affect household income, food security, and overall well-being. The RAP therefore adopts a precautionary approach that allows additional support measures to be provided should vulnerable cases emerge during implementation.

The project will not require compulsory acquisition of privately owned land, nor will it result in residential displacement. However, implementation of the composting facility will require the

clearance of existing economic activities from the project site, resulting primarily in economic displacement. The principal impacts on PAPs include:

- Loss of access to current business operating space;
- Loss of temporary structures, sheds, kiosks, containers, and workspaces;
- Temporary interruption of business operations during relocation;
- Restricted access to waste streams and recyclable materials during transition;
- Potential disruption of established customer, supplier, and market networks;
- Temporary loss of income during the relocation period;
- Increased transportation costs and operational adjustments during business re-establishment.

In addition to these direct impacts, several indirect impacts may occur if relocation is not effectively managed. These include reduced business productivity during transition, loss of customers due to changes in location, reduced access to suppliers, increased operating costs, temporary unemployment among informal workers, and disruption of economic relationships that have developed over time within the existing scrap and recycling cluster. Such impacts could disproportionately affect PAPs whose livelihoods depend exclusively on activities undertaken at the site.

To address these impacts, the RAP adopts a relocation and livelihood restoration approach consistent with AfDB Operational Safeguard 5 (OS5). Loss of access to existing business operating spaces will be mitigated through the allocation of serviced plots and designated workspaces at a prepared relocation site prior to displacement. Temporary structures, sheds, kiosks, containers, and other eligible improvements will be replaced through full replacement cost compensation and/or reconstruction by the Accra Metropolitan Assembly (AMA) at the relocation site. Temporary interruption of business activities during relocation will be minimized through phased relocation, logistical assistance, transportation support, and business re-establishment measures. Restricted access to waste streams and recyclable materials will be addressed through the integration of PAPs into the reorganized waste management and recycling system and the maintenance of access to productive resources at the new site. Potential disruption of customer, supplier, and market networks will be mitigated through market linkage support, stakeholder coordination, and assistance in reconnecting PAPs to existing commercial relationships. Temporary income losses during the relocation period will be addressed through livelihood restoration measures and, where relocation delays exceed six months, trigger-based transitional livelihood support. Increased transportation costs and operational adjustments associated with business re-establishment will be mitigated through project-financed relocation assistance, transportation of business assets and inventory, and support for restarting operations at the relocation site. Detailed mitigation, entitlement, relocation, and livelihood restoration measures are presented in Chapters 9 and 10 of this RAP.

The socio-economic assessment further established that scrap materials stored on the site represent business inventory, working capital, and productive assets rather than waste. Consequently, the relocation and preservation of these materials are critical to livelihood continuity. Loss, damage, or restricted access to these assets could result in significant economic hardship for affected operators.

Despite these risks, the project also presents important socio-economic opportunities. The development of a modern composting facility is expected to improve environmental sanitation, enhance waste management efficiency, reduce public health risks associated with unmanaged waste, create new employment opportunities within the formal waste sector, and strengthen circular economy initiatives in the Greater Accra Metropolitan Area. Through the implementation of the RAP and Livelihood Restoration Plan (LRP), the project seeks to ensure that affected persons are able to transition successfully to the new site, restore their livelihoods, and continue participating in the waste and recycling economy without being worse off as a result of the project.

Given the high dependence of PAPs on site-based economic activities, livelihood restoration, relocation support, business continuity measures, and sustained stakeholder engagement constitute critical elements of the RAP. These measures are designed to mitigate both direct and indirect displacement impacts and to ensure compliance with AfDB Operational Safeguard 5 on Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement.

### **Stakeholder Engagement and Disclosure**

Stakeholder engagement was undertaken as part of the ESIA and RAP preparation process. Stakeholders included AMA officials, sub-metropolitan representatives, local leaders, scrap dealers, informal waste operators, community members, service providers, and relevant institutions. Consultations focused on:

- project impacts;
- PAP identification;
- relocation expectations;
- compensation principles;
- livelihood restoration needs;
- grievance procedures;
- disclosure of the cut-off date;
- concerns around loss of income and business continuity.

The RAP provides for ongoing engagement during implementation. PAPs and their associations will be involved in relocation planning, site allocation, validation of PAP records, grievance resolution, and livelihood restoration monitoring.

### **Grievance Redress Mechanism**

A dedicated GRM has been established to ensure that complaints are received, registered, assessed, resolved, and monitored in a transparent and timely manner.

The GRM will operate at multiple levels:

- community level;
- AMA/sub-metro level;
- regional escalation through GARCC where required;
- judicial or arbitration recourse as a final option.

The GRM will address complaints relating to:

- PAP eligibility;
- cut-off date disputes;
- compensation valuation;
- site allocation;
- relocation logistics;
- damage to assets during movement;
- livelihood restoration support;
- implementation delays.

The GRM includes procedures for confidential handling of GBV/SEA/SH-related complaints. A lean GRM budget of **USD 25,000** is proposed, based on use of existing AMA structures, community focal persons, simple digital tools, and targeted capacity support.

### **Impact Assessment and Resettlement Needs**

The impact assessment confirms that the project will mainly result in economic displacement.

Key impacts include:

- loss of business operating space;
- disruption of scrap dealing and waste-related livelihoods;
- removal or relocation of temporary structures;
- disruption of access to waste materials;
- temporary loss of income during relocation;
- disruption of customer and supplier networks;
- risk of livelihood decline if relocation is not properly managed.

The RAP response is therefore livelihood-centered. The focus is not residential resettlement (as this does not apply) but business relocation, preservation of productive assets, restoration of income, and reintegration into a functional economic system.

### **Census, Asset Inventory and PAP Profile**

The census and asset inventory identified **104 Project Affected Persons (PAPs)**.

| <b>PAP Category</b>                        | <b>Estimated Number</b> | <b>Description</b>                                               |
|--------------------------------------------|-------------------------|------------------------------------------------------------------|
| Scrap Dealers                              | 90                      | Main operators owning scrap stock, business space, and equipment |
| Waste Pickers                              | 3                       | Collectors dependent on waste streams                            |
| Informal Workers                           | 4                       | Assistants, loaders, dismantlers, and support labour             |
| Traders -Food venders/<br>Support Services | 7                       | Food vendors and small support-service providers                 |
| <b>Total</b>                               | <b>104</b>              |                                                                  |

The census confirms that the dominant affected group is scrap dealers. This means the RAP must prioritize business continuity, relocation of stock, site allocation, and livelihood restoration. No vulnerable PAPs were formally identified during the census. However, the RAP

includes a contingency mechanism to identify and assist any vulnerability that may emerge during implementation.

### **Eligibility, Entitlements, Compensation and Relocation Framework**

A census and asset inventory undertaken within the project footprint identified a total of 104 Project Affected Persons (PAPs), comprising scrap dealers, waste pickers, informal workers, and support-service providers whose livelihoods depend on activities conducted on the site. A cut-off date was established and publicly disclosed to prevent speculative occupation and ensure that only eligible PAPs identified during the census benefit from compensation and assistance measures.

As the project site is located on land owned and managed by the Accra Metropolitan Assembly (AMA), PAPs are not eligible for compensation for land. However, in accordance with AfDB Operational Safeguard 5 (OS5), PAPs are eligible for compensation and assistance related to economic displacement, including compensation for affected structures at full replacement cost, relocation support, site allocation at the designated relocation area, livelihood restoration assistance, and transitional support where applicable.

The census and asset inventory confirmed that the principal losses relate to business operating spaces, temporary structures, containers, kiosks, access to waste streams, and temporary disruption of livelihoods. Scrap materials stored on-site were recognized as business inventory and productive assets. Consequently, the RAP adopts a relocation-based approach whereby scrap materials, equipment, and business assets will be transferred to the new site with logistical support rather than compensated in cash.

Extensive consultations were undertaken with PAPs, scrap dealer associations, AMA officials, community representatives, and other stakeholders during RAP preparation. Key concerns raised included continuity of business operations, accessibility of the relocation site, preservation of customer networks, and livelihood restoration. These consultations informed the design of the entitlement framework, relocation strategy, and livelihood restoration measures.

The project's primary mitigation measure is the relocation of PAPs to a designated alternative site to be prepared by AMA prior to displacement. The relocation site will provide designated operating spaces and basic infrastructure to support continuity of economic activities. PAPs will receive assistance for transportation of scrap materials, equipment, containers, and other business assets, as well as support for re-establishing operations at the new location.

The total RAP budget covers replacement of affected structures, relocation logistics, site preparation and installation of affected structures, livelihood restoration support, grievance management, implementation, monitoring, and contingency provisions. Compensation payments as applicable, relocation assistance, and site preparation activities will be completed prior to displacement. Livelihood restoration measures will continue after relocation to ensure that affected persons restore or improve their income levels and living standards. Implementation will be undertaken according to a phased schedule covering RAP disclosure, PAP verification,

compensation, site preparation, relocation, livelihood restoration, and post-relocation monitoring.

The entitlement framework includes:

| Type of Loss                    | PAP Category                    | Entitlement                                                                         |
|---------------------------------|---------------------------------|-------------------------------------------------------------------------------------|
| Loss of business space          | Scrap dealers                   | Alternative serviced site and relocation support                                    |
| Loss of structures              | Scrap dealers and traders       | AMA-built replacement structure at the relocation site.                             |
| Temporary income loss           | Eligible PAPs                   | Trigger-based transitional support if relocation is delayed beyond three (3) months |
| Loss of access to waste streams | Scrap dealers and waste pickers | Integration into new waste/recycling system                                         |
| Loss of employment              | Informal workers                | Skills training, job linkage, and employment support                                |

Scrap materials are treated as business inventory and working capital. They will not be compensated in cash except where verified damage occurs during relocation. The preferred approach is supported relocation to preserve productive assets and avoid inflated claims.

### **Relocation Strategy**

Relocation to a new site is the central mitigation measure under this RAP. The relocation strategy is based on the following principles:

- the new site must be prepared before displacement;
- PAPs must participate in site planning and allocation;
- the site must support continuation of economic activities;
- access to markets, buyers, suppliers, and waste streams must be maintained;
- relocation must be sequenced to reduce disruption.

Relocation support will include:

- transport assistance;
- loading and offloading support;
- movement of scrap materials, tools, containers, and equipment;
- allocation of designated plots or workspaces;
- basic infrastructure such as access, drainage, demarcation, and security;
- setup support at the new site.

**NB: Accra Metropolitan Assembly shall bear the total costs of the complete relocation of all assets to the new site.**

### Livelihood Restoration Plan

The LRP is designed to ensure that PAPs can restart and sustain their income-generating activities after relocation.

Livelihood restoration measures include:

- allocation of serviced space at the relocation site;
- relocation of scrap stock and equipment;
- business re-establishment support;
- market linkage support;
- reconnection to buyers and suppliers;
- integration into formal waste and recycling systems;
- skills training and employment support for informal workers.

Transitional livelihood support will only be triggered if relocation is not completed within **three months** from the officially communicated relocation start date. If triggered, support may include temporary income support, business restart assistance, and market linkage support.

### Implementation Arrangements

Implementation will be led by AMA through a Project Coordination Unit (PCU). The PCU will coordinate all RAP and LRP activities, including compensation, relocation, livelihood restoration, GRM operation, monitoring, reporting, and completion audit.

Key institutions and roles include:

| Institution / Actor                  | Role                                          |
|--------------------------------------|-----------------------------------------------|
| AMA                                  | Lead implementation agency                    |
| PCU                                  | Day-to-day coordination and reporting         |
| RAP Implementation Team              | Field-level execution                         |
| Lands Commission / valuation support | Technical valuation guidance                  |
| EPA                                  | Environmental and social regulatory oversight |
| Social Welfare Department            | Contingency support if vulnerability emerges  |
| Contractors / Service Providers      | Site preparation and relocation logistics     |
| PAP Representatives                  | Communication, validation, and mobilization   |
| GRM Committees                       | Complaint handling and dispute resolution     |
| AfDB / Development Partners          | Safeguard compliance oversight                |

**NB:** No displacement shall occur until compensation, relocation-site preparation, and relocation is fully implemented.

### Implementation Schedule

The RAP will be implemented in phases.

| Activity                       | Indicative Timeline/Dates |
|--------------------------------|---------------------------|
| RAP disclosure and approval    | Month 1/ June 2026        |
| PAP verification and agreement | Month 1-2 / June 2026     |

|                             |                           |
|-----------------------------|---------------------------|
| Relocation site preparation | Month 4-7- /Sept-Dec 2026 |
| Relocation of PAPs          | Month 8 January 2027      |
| Monitoring and evaluation   | Continuous                |

NB: The sequencing is critical. Compensation (as applicable) and relocation-site readiness must occur before displacement.

### **Monitoring and Evaluation of the RAP Execution**

Monitoring will be conducted internally by the PCU and RAP Implementation Team. External monitoring may be undertaken where required by AfDB or other financing partners.

Monitoring will track:

- relocation progress;
- livelihood restoration;
- GRM performance;
- stakeholder engagement;
- documentation completeness;
- income recovery.

Monitoring of RAP implementation will be undertaken through a combination of internal, institutional, and external monitoring mechanisms to ensure compliance with AfDB Operational Safeguard 5 (OS5), national requirements, and RAP commitments. Internal monitoring will be conducted by the Project Coordination Unit (PCU) and RAP Implementation Team on a continuous basis. This will focus on compensation delivery, relocation progress, livelihood restoration, stakeholder engagement, grievance management, and implementation of corrective actions. In addition, relevant government institutions will participate in monitoring and oversight as follows:

- **Accra Metropolitan Assembly (AMA):** Overall supervision of RAP implementation, relocation site preparation, compensation administration, and stakeholder engagement.
- **Environmental Protection Authority (EPA):** Oversight of compliance with environmental and social commitments contained in the ESIA, RAP, and environmental permitting requirements.
- **Greater Accra Regional Coordinating Council (GARCC):** Coordination and oversight of implementation progress, including escalation of grievances that cannot be resolved at the local level.
- **Department of Social Welfare:** Monitoring of social impacts, livelihood restoration outcomes, and provision of support where vulnerable cases emerge during implementation.
- **Lands Commission (where required):** Technical guidance on asset valuation principles, compensation verification, and land-related matters associated with relocation.
- **National Development Planning Commission (NDPC) and/or relevant waste management authorities (where applicable):** Monitoring alignment of project implementation with local development and waste management objectives.

External monitoring may be undertaken by the African Development Bank (AfDB), independent consultants, or other financing partners to verify compliance with safeguard requirements and assess the effectiveness of compensation, relocation, and livelihood restoration measures.

A RAP Completion Audit will be conducted upon completion of implementation to verify that all eligible PAPs have received their entitlements, relocation has been completed, livelihoods have been restored or improved, and RAP objectives have been achieved. The audit findings will inform any corrective actions required before formal closure of the RAP.

Key targets include:

- 100% of eligible PAPs relocated;
- at least 90% of PAPs able to resume economic activities;
- income restored or improved compared to baseline;
- at least 90% of grievances resolved;
- 100% completeness of RAP records.

Periodic reports will be prepared and disseminated and a Completion Audit will be conducted at the end of implementation to confirm whether all RAP commitments have been fulfilled and whether livelihood restoration objectives have been achieved.

### **Budget and Financing Arrangements**

The estimated RAP budget is **USD 200,000**, including contingency.

| <b>Cost Category</b>             | <b>Estimated Cost (USD)</b> |
|----------------------------------|-----------------------------|
| Relocation logistics             | 25,000                      |
| Relocation site preparation      | 30,000                      |
| Livelihood restoration support   | 25,000                      |
| Transitional support contingency | 25,000                      |
| GRM implementation               | 25,000                      |
| RAP implementation / PCU support | 20,000                      |
| Monitoring and evaluation        | 20,000                      |
| <b>Subtotal</b>                  | <b>150,000</b>              |
| Contingency                      | <b>50,000</b>               |
| <b>Total Estimated Budget</b>    | <b>200,000</b>              |

**NB: The budget will be financed by the project proponent and/or project financing arrangements. Funds must be secured and available before implementation begins.**

### **Key Risks and Mitigation**

Key RAP implementation risks include:

- delay in relocation-site preparation;
- disputes over compensation or eligibility;
- conflict over allocation of space at the new site;
- damage to assets during movement;
- livelihood disruption during transition;

- exclusion from formalized waste systems.

Mitigation measures include:

- transparent verification and valuation;
- early site preparation;
- participatory site allocation;
- supervised relocation logistics;
- functional GRM;
- trigger-based transitional support;
- continuous livelihood monitoring.

## **Conclusion**

This RAP/LRP provides a comprehensive and practical framework for managing the economic displacement impacts of the Source-Separated Organic Waste Composting Plant in Jamestown. It recognizes that although PAPs do not hold formal land title, they have established economic dependence on the site and must therefore be supported in line with AfDB OS5. The RAP focuses on relocation, livelihood restoration, and structured implementation. With effective execution, the project can deliver its environmental, climate, and waste management benefits while ensuring that affected persons are treated fairly, relocated timely and safely, and supported to restore or improve their livelihoods. This will be the full responsibility of the Accra Metropolitan Assembly, who will bear the full cost of relocation of PAPs economic assets to the new site, preparation of the site, installation of the existing structures e.g. prayer/resting shed and related structures.

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## 1. INTRODUCTION

This Resettlement Action Plan (RAP) and Livelihood Restoration Plan (LRP) has been prepared for the Construction and Operation of the Source-Separated Organic Waste Composting Plant in Jamestown, Accra, implemented by the Accra Metropolitan Assembly (AMA) with financing support from the African Development Bank (AfDB). The RAP responds directly to the findings of the Environmental and Social Impact Assessment (ESIA), which confirmed that while the project delivers significant environmental and climate benefits, it will also result in economic displacement of informal waste sector actors, including scrap dealers, waste pickers, and associated service providers operating within the project footprint and its area of influence.

### **Project Context and Resettlement Trigger**

The project is situated on approximately 1.77 hectares of publicly owned land under AMA, currently occupied by informal users without formal land rights but with established economic dependence on the site. As a result:

- No compulsory acquisition of privately owned land is required;
- However, loss of access to business space, waste streams, and income-generating activities will occur;
- This constitutes economic displacement under AfDB safeguards, triggering the requirement for a RAP/LRP.

Accordingly, this RAP is not driven by land ownership transfer, but by the need to manage livelihood disruption and ensure equitable economic transition.

### **Policy and Legal Framework Alignment**

This RAP is developed in full compliance with:

- Applicable national legislation, including the Constitution of Ghana, the Lands Act, 2020 (Act 1036), and the Environmental Assessment Regulations, 2025 (L.I. 2504).
- The AfDB Integrated Safeguards System (ISS, 2023), particularly Operational Safeguards 5 (OS5) and 10 (OS10);

While national law primarily addresses compensation linked to legal land interests, this RAP adopts the higher AfDB OS5 standard, which requires:

- Compensation at full replacement cost (without depreciation);
- Inclusion of informal and non-title holders;
- Mandatory livelihood restoration and improvement;
- Structured implementation, monitoring, and completion audit.

### **Strategic Approach of the RAP**

This RAP adopts a relocation-centered and livelihood-focused approach, reflecting the nature of impacts and the structure of the informal waste economy. The core strategy is built on the following pillars:

- **Relocation, not displacement without support**
  - PAPs will be moved to a prepared alternative site that supports continued economic activity
- **Asset protection over cash substitution**

- Scrap materials are treated as productive business assets, to be relocated rather than compensated in cash
- **Livelihood continuity and restoration**
  - The LRP ensures PAPs can resume, restore, and where possible improve income levels
- **System integration**
  - Informal actors are supported to integrate into the formalized waste management system
- **Risk-managed transition**
  - Transitional support mechanisms are triggered if relocation delays occur. Transitional support will be provided as necessary to all economically displaced persons, based on a reasonable estimate of the time required to restore their income-earning capacity, production levels, and standards of living.

### **Purpose of the RAP**

The purpose of this RAP/LRP is to provide a comprehensive, implementable framework to:

- Identify all Project Affected Persons (PAPs) through a verified census;
- Define eligibility and entitlement in a transparent manner;
- Provide compensation for affected assets at full replacement cost;
- Facilitate relocation to a functional and serviced site;
- Restore and enhance livelihoods through structured interventions;
- Establish a functional Grievance Redress Mechanism (GRM);
- Ensure effective implementation through clear institutional arrangements, budget, and schedule;
- Monitor outcomes and verify compliance through a completion audit.

### **Overarching Principle**

The guiding principle of this RAP is clear:

Project Affected Persons (PAPs) will not be made worse off as a result of the project, and will be supported to restore or improve their livelihoods in a structured, fair, and sustainable manner.

### **Role of the RAP within the Project**

This RAP is not a standalone document, it is the operational bridge between ESIA findings and on-the-ground implementation. It translates identified risks into:

- Concrete compensation measures
- Relocation logistics and sequencing
- Livelihood restoration interventions
- Institutional responsibilities and timelines
- Monitoring and accountability mechanisms

### **Structure of the Document**

The RAP is structured to reflect the full lifecycle of resettlement planning and implementation, including:

- Impact assessment and resettlement needs

- Census and asset inventory
- Eligibility and entitlement framework
- Compensation and relocation strategy
- Livelihood Restoration Plan (LRP)
- Grievance Redress Mechanism (GRM)
- Implementation arrangements
- Monitoring, evaluation, and completion audit
- Budget and financing

### **1.1 Background and Project Context**

The Accra Metropolitan Assembly (AMA), with financial support from the African Development Bank (AfDB), is implementing a Source-Separated Organic Waste Composting Plant in Jamestown, within the Ashiedu Keteke Sub-Metropolitan Area of Accra. The project forms part of Accra's broader municipal solid waste (MSW) reform agenda, circular economy transition strategy, and climate resilience framework aimed at improving environmental sustainability and public health outcomes in the Greater Accra Metropolitan Area. Accra generates substantial volumes of municipal solid waste annually, with organic waste constituting more than 50 percent of the total waste stream. At present, the majority of this organic waste is transported to landfill sites where it decomposes anaerobically, producing methane, a greenhouse gas with significantly higher global warming potential than carbon dioxide. In addition to contributing to climate change, the current waste management system exerts pressure on landfill capacity, accelerates landfill saturation, generates leachate that threatens groundwater quality, and contributes to odour and vector-related public health concerns.

The proposed composting facility seeks to transform this waste management challenge into an environmental and economic opportunity by diverting source-separated organic waste from landfills and converting it into nutrient-rich compost. The compost product is expected to support urban and peri-urban agriculture, improve soil fertility, reduce reliance on chemical fertilizers, and contribute to food security objectives. The project therefore aligns with Ghana's climate mitigation commitments, sustainable urban development goals, and green job creation agenda. To assess the environmental and social implications of the project, an Environmental and Social Impact Assessment (ESIA) was undertaken in accordance with Ghana's Environmental Assessment Regulations, 1999 (LI 1652), and applicable international standards. The ESIA concluded that the project will generate significant positive environmental and socio-economic benefits, including reduced greenhouse gas emissions, improved sanitation conditions, job creation within the formal waste sector, and strengthened institutional waste management systems. However, the ESIA also identified that implementation of the project will result in economic displacement impacts within the project footprint. Specifically, the site earmarked for development is currently occupied and utilized by informal economic actors, including:

- Scrap dealers and recyclers operating within the proposed project site;
- Informal waste pickers and small-scale recyclers whose access to recyclable and organic waste streams may be altered by the formalization of waste segregation;
- Other informal users dependent on the site and surrounding waste value chain activities for livelihood generation.

Although large-scale physical relocation of residential households is not anticipated, the ESIA confirmed that economic displacement and potential loss of income sources will occur. These impacts arise primarily from the clearance of the project footprint and the restructuring of access to waste materials that currently support informal livelihoods. In accordance with the AfDB Integrated Safeguards System (ISS, 2023), particularly Operational Safeguard 5 (OS5) on Land Acquisition, Restrictions on Land Use and Involuntary Resettlement, economic displacement resulting from project activities triggers the mandatory preparation of a Resettlement Action Plan (RAP). OS5 applies not only to physical relocation but also to situations where individuals lose access to land, assets, or income-generating opportunities as a result of project implementation. This RAP has therefore been prepared to establish a comprehensive framework for managing resettlement-related impacts. It sets out the principles, eligibility criteria, entitlements, compensation mechanisms, livelihood restoration measures, grievance redress arrangements, and institutional responsibilities necessary to ensure compliance with AfDB OS5 and applicable national legislation.

The fundamental objective of this RAP is to ensure that all Project Affected Persons (PAPs):

- Are identified through a transparent and verifiable census process;
- Are meaningfully consulted and participate in decision-making processes affecting them;
- Receive compensation at full replacement cost without depreciation;
- Are provided with adequate assistance to restore or improve their livelihoods to pre-project levels;
- Receive additional targeted support where identified as vulnerable.

Through the implementation of this RAP, AMA and the AfDB seek to ensure that the environmental and climate benefits of the composting project are not achieved at the expense of vulnerable informal workers but rather contribute to a more inclusive and socially responsible transition toward sustainable waste management in Accra.

## **1.2 Purpose and Objectives of the RAP**

### **Purpose**

The primary purpose of this Resettlement Action Plan (RAP) and Livelihood Restoration Plan (LRP) is to establish a comprehensive framework of principles, procedures, entitlements, and implementation arrangements to effectively mitigate adverse social impacts arising from land acquisition, restrictions on land use, and economic displacement associated with the project. In line with the African Development Bank's Integrated Safeguards System (ISS, 2023), particularly Operational Safeguard 5 (OS5), the RAP/LRP ensures that all Project Affected Persons (PAPs) are compensated at full replacement cost and are supported to restore, and where possible improve, their livelihoods and living standards.

### **Objectives**

Specifically, the RAP/LRP seeks to:

1. **Avoid and Minimize Resettlement**  
Ensure that involuntary resettlement and economic displacement are avoided where feasible, and minimized through appropriate project design, siting, and implementation measures.
2. **Identify and Enumerate Project Affected Persons (PAPs)**  
Undertake a comprehensive census and asset inventory to identify all affected individuals, households, and economic actors, including informal and vulnerable groups.
3. **Establish Eligibility and Entitlement Framework**  
Define clear eligibility criteria and entitlements for compensation and assistance in accordance with AfDB OS5 and applicable national legislation.
4. **Provide Compensation at Full Replacement Cost**  
Ensure that all affected assets and losses are compensated at full replacement cost, without depreciation, and inclusive of transaction and restoration costs.
5. **Restore and Improve Livelihoods (Core LRP Objective)**  
Design and implement targeted livelihood restoration measures to enable PAPs, particularly economically displaced persons, to restore, and preferably improve, their pre-project income levels and economic resilience.
6. **Provide Targeted Support to Vulnerable Groups**  
Identify and provide additional assistance to vulnerable PAPs, including women, youth, persons with disabilities, and other at-risk groups, to ensure equitable outcomes.
7. **Establish an Effective Grievance Redress Mechanism (GRM)**  
Develop and operationalize an accessible, transparent, and culturally appropriate grievance mechanism to address complaints in a timely and fair manner.
8. **Define Institutional, Financial, and Implementation Arrangements**  
Establish clear institutional responsibilities, implementation procedures, timelines, and budgetary provisions to ensure effective, transparent, and accountable RAP/LRP implementation, including monitoring and completion audit.

### 1.3 Linkages with the ESIA and AfDB ISS (OS5)

This Resettlement Action Plan (RAP) and Livelihood Restoration Plan (LRP) is anchored in a coherent framework that integrates: (i) the findings of the Environmental and Social Impact Assessment (ESIA), (ii) the requirements of the project's Terms of Reference under the Expression of Interest (EOI), and (iii) the safeguard standards of the African Development Bank's Integrated Safeguards System (ISS, 2023), particularly Operational Safeguard 5 (OS5). The ESIA provides the analytical basis for identifying resettlement impacts, specifically economic displacement, while the EOI defines the scope and deliverables required for managing these impacts. The RAP/LRP translates these requirements into a structured and implementable framework comprising compensation measures, livelihood restoration interventions, institutional arrangements, and monitoring mechanisms. Accordingly, this RAP/LRP serves as the operational bridge between impact identification and mitigation implementation, ensuring that all resettlement-related risks identified in the ESIA are addressed in full compliance with AfDB safeguard requirements and aligned with national legal provisions. The following sections elaborate on: (i) the linkage between the RAP/LRP and ESIA findings; and (ii) the alignment of the RAP/LRP with AfDB ISS (OS5) principles.

### **1.3.1 Linkage with the ESIA**

This Resettlement Action Plan (RAP) and Livelihood Restoration Plan (LRP) is directly informed by, and derived from, the findings of the Environmental and Social Impact Assessment (ESIA) prepared for the Construction and Operation of the Source-Separated Organic Waste Composting Plant in Jamestown, Accra. The ESIA serves as the primary analytical foundation for identifying and assessing the project's environmental and social risks, including those related to land acquisition and economic displacement. It provides the evidence base upon which this RAP/LRP is developed, ensuring that all resettlement-related impacts are systematically addressed in accordance with international safeguard requirements.

#### **Key Findings Relevant to Resettlement**

The following key conditions and impact pathways necessitating resettlement planning were identified:

- Land acquisition within Jamestown covering approximately 1.77 hectares;
- The presence of informal economic activities within the project footprint;
- Potential disruption of existing waste value chains;
- Risks of economic displacement affecting informal scrap dealers, waste pickers, and related actors;
- The need for structured livelihood restoration measures to mitigate income loss and vulnerability.

The ESIA further confirmed that there are no residential displacement. While physical displacement of residential households is not anticipated, the project will result in economic displacement arising from loss of access to income-generating opportunities and productive resources. This includes impacts on informal operators whose livelihoods are dependent on the current use of the project site and associated waste streams.

#### **ESIA Recommendation and RAP/LRP Trigger**

Based on these findings, the ESIA recommended the preparation of a Resettlement Action Plan (RAP), including a Livelihood Restoration Plan (LRP) to address identified impacts in line with international financing requirements. This requirement is consistent with the project's Terms of Reference under the Expression of Interest (EOI), which mandates the preparation of a RAP to:

- Identify and enumerate all Project Affected Persons (PAPs), including informal actors;
- Assess the nature and extent of displacement;
- Develop compensation and livelihood restoration measures;
- Establish a grievance redress mechanism; and
- Define implementation arrangements, timelines, and budget provisions.

#### **RAP/LRP as an Operational Instrument of the ESIA**

This RAP/LRP therefore functions as the operational instrument for implementing ESIA mitigation commitments, translating identified risks into specific, actionable, time-bound, and budgeted interventions. In particular, the RAP/LRP operationalizes ESIA commitments relating to:

- Compensation for loss of assets and income at full replacement cost;
- Livelihood restoration, including support for economic reintegration and income recovery;

- Stakeholder consultation and participation, ensuring continued engagement of affected persons;
- Grievance redress, through establishment of accessible and transparent mechanisms;
- Monitoring and reporting, to track implementation performance and outcomes.

Through this approach, the RAP/LRP ensures that ESIA-identified risks are not only acknowledged but are effectively managed through enforceable implementation measures, thereby safeguarding affected persons and promoting inclusive and sustainable project outcomes.

### 1.3.2 Compliance with AfDB ISS (2023) - OS5

This Resettlement Action Plan (RAP) and Livelihood Restoration Plan (LRP) has been prepared in full alignment with the African Development Bank's Integrated Safeguards System (ISS, 2023), specifically Operational Safeguard 5 (OS5): Land Acquisition, Restrictions on Land Use and Involuntary Resettlement. OS5 establishes the policy and procedural framework for managing both physical and economic displacement, including situations where project activities result in loss of access to land, assets, or income-generating opportunities. In the context of this project, the RAP is triggered primarily by economic displacement of informal waste sector actors, as identified in the ESIA.

#### Application of OS5 to the Project Context

In accordance with OS5, economic displacement, such as loss of access to waste streams and livelihood resources, requires the preparation and implementation of a RAP/LRP to ensure that affected persons are adequately compensated and supported. This RAP/LRP therefore ensures that all affected persons, including informal and non-title holders, are recognized and assisted in restoring their livelihoods, consistent with AfDB safeguard requirements.

#### Core OS5 Principles Reflected in this RAP/LRP

The design and implementation of this RAP/LRP are guided by the following key OS5 principles:

- **Avoidance and Minimization of Displacement**  
Resettlement impacts have been minimized through project design and site selection, with displacement considered only where unavoidable.
- **Compensation at Full Replacement Cost**  
All affected assets and losses are compensated at full replacement cost, without depreciation, and inclusive of transaction costs.
- **Livelihood Restoration and Improvement**  
Priority is given to restoring, and where feasible improving, the livelihoods of economically displaced persons through targeted livelihood restoration programs.
- **Meaningful Consultation and Participation**  
PAPs are engaged through inclusive and culturally appropriate consultation processes, ensuring their participation in planning and implementation.
- **Protection of Vulnerable Groups**  
Additional assistance is provided to vulnerable PAPs, including women, youth, and persons with disabilities, to ensure equitable outcomes.

- **Grievance Redress Mechanism (GRM)**  
A functional, accessible, and transparent GRM is established to address grievances in a timely and fair manner.
- **Monitoring, Evaluation, and Completion Audit**  
Robust monitoring systems are established, including internal and external oversight, culminating in a Completion Audit to verify that RAP objectives have been achieved.

#### **Application of the Higher Standard Principle**

While this RAP/LRP complies with applicable national legislation governing land acquisition and compensation, it adopts the higher standard of the AfDB ISS (OS5) in areas where gaps exist.

In particular:

- Compensation is based on full replacement cost, rather than depreciated or market value;
- Livelihood restoration is mandatory, not discretionary;
- Informal and non-title holders are eligible for assistance;
- Implementation includes monitoring and completion audit requirements.

Accordingly, where differences arise between national legal provisions and AfDB safeguard requirements, the AfDB OS5 standard prevails, ensuring full compliance with international best practice.

### **1.4 Scope of the RAP**

This RAP and Livelihood Restoration Plan (LRP) defines the full extent of resettlement-related impacts associated with the project, in terms of where impacts occur (geographic scope), who is affected (social scope), and when impacts arise and are addressed (temporal scope). The scope is informed by the ESIA findings and aligns with the requirements of the project's Terms of Reference and the African Development Bank's Integrated Safeguards System (ISS, 2023), ensuring that all affected persons and impact pathways are comprehensively captured and addressed.

#### **1.4.1 Geographic Scope**

The geographic scope of the RAP/LRP encompasses all areas directly and indirectly affected by project activities, including:

- The 1.77-hectare project footprint in Jamestown, identified for the construction and operation of the composting facility;
- Adjacent areas where economic activities linked to the project site currently occur, including scrap dealing, waste picking, and informal trading;
- Any additional zones affected by temporary or permanent access restrictions during construction and operation phases.

Accordingly, the geographic scope includes not only the immediate project site but also associated areas within the waste value chain where project activities may alter access to resources, markets, or income-generating opportunities.

#### **1.4.2 Social Scope**

The social scope of the RAP/LRP covers all categories of Project Affected Persons (PAPs) identified through the census and socio-economic survey, including both direct and indirect impacts.

These include:

- Economically displaced persons, such as scrap dealers, informal recyclers, and waste pickers whose livelihoods depend on access to the project site and associated waste streams;
- Individuals and groups experiencing temporary income disruption during construction or transition phases;
- Vulnerable groups, including women-led enterprises, youth, elderly persons, and persons with disabilities (PWDs), who may face disproportionate impacts or reduced capacity to restore livelihoods;
- Any physically displaced persons, if identified during the detailed census and asset inventory.

In line with AfDB OS5, the RAP/LRP applies to all affected persons regardless of legal tenure status, including informal and non-title holders.

#### 1.4.3 Temporal Scope

The temporal scope of the RAP/LRP covers all phases of the project lifecycle during which resettlement-related impacts may occur, including:

- **Pre-construction phase:** Land acquisition, site clearance, and initial displacement of economic activities;
- **Construction phase:** Temporary access restrictions, disruption of livelihoods, and transitional impacts;
- **Operational phase:** Long-term changes to waste value chains, access to materials, and livelihood systems.

The obligations of this RAP/LRP remain in effect until all resettlement commitments have been fully implemented and verified. Specifically, implementation is considered complete only when:

- An appropriate site has been identified and allocated to all PAPs to continue their scrap-dealing business activities
- Compensation has been fully paid at replacement cost;
- Livelihood restoration measures have been successfully implemented, with PAPs able to restore or improve their pre-project income levels;
- A Completion Audit confirms that the objectives of the RAP/LRP have been achieved in accordance with AfDB OS5.

#### 1.5 Methodology for RAP Preparation

The preparation of this Resettlement Action Plan (RAP) and Livelihood Restoration Plan (LRP) followed a structured, participatory, and evidence-based methodology, consistent with the requirements of the African Development Bank's Integrated Safeguards System (ISS, 2023), particularly Operational Safeguard 5 (OS5), as well as good international practice. The methodology builds upon the analytical framework established in the Environmental and Social Impact Assessment (ESIA), including baseline socio-economic analysis, stakeholder engagement processes, and impact identification. It also reflects the requirements of the project's Terms of

Reference, which mandate the identification of Project Affected Persons (PAPs), assessment of displacement impacts, and development of compensation and livelihood restoration measures. The RAP/LRP preparation process combined desk-based analysis, field data collection, participatory consultations, and valuation assessments to ensure that all affected persons are accurately identified and that mitigation measures are appropriate, equitable, and implementable.

### **1.5.1 Desk Review**

A comprehensive desk review was undertaken to establish the legal, institutional, and technical foundation for the RAP/LRP. This included:

- Review of ESIA findings, including baseline conditions, stakeholder consultations, and identified social impacts such as disruption of informal waste value chains and economic displacement ;
- Review of applicable national legal and regulatory frameworks governing land acquisition, compensation, and environmental assessment;
- Review of the AfDB ISS (2023), particularly OS5, to ensure alignment with international safeguard requirements;
- Review of project documentation, including site maps, land ownership status, and area of influence, as defined in the ESIA (including the 1.77-hectare project footprint and surrounding impact zones).

This review provided the basis for defining the scope of impacts, identifying regulatory requirements, and designing appropriate resettlement and livelihood restoration measures.

### **1.5.2 Stakeholder Consultations**

Consistent with both ESIA processes and AfDB OS5 requirements, meaningful and inclusive stakeholder consultations were conducted throughout the RAP preparation process.

Consultations were held with:

- Scrap dealers and informal operators located within the project site;
- Informal waste pickers and actors within the waste value chain;
- Local leaders and representatives of the Accra Metropolitan Assembly (AMA);
- Relevant government agencies and community stakeholders;
- Affected community members within the project area of influence.

These consultations built on earlier ESIA engagement processes, which emphasized transparency, inclusiveness, and stakeholder participation in project planning.

Key consultation themes included:

- Nature and extent of anticipated project impacts;
- Preferences regarding compensation and transitional support;
- Potential relocation or alternative business arrangements;
- Livelihood restoration needs and opportunities;
- Grievance redress expectations.

The consultation process ensured that PAPs' views were incorporated into the design of compensation measures and livelihood restoration programs, thereby enhancing ownership and sustainability of outcomes.

### **1.5.3 Census and Asset Inventory**

A detailed census and asset inventory was undertaken to identify and document all Project Affected Persons (PAPs) and their associated assets and livelihood activities.

The census aimed to:

- Identify all individuals, households, and economic actors affected by the project;
- Document existing business activities, including informal waste-related livelihoods;
- Record physical structures, movable assets, and productive assets within the project footprint;
- Identify vulnerable individuals and households requiring additional assistance.

In accordance with international best practice, a cut-off date was established and publicly disclosed to prevent opportunistic settlement or claims after the census period.

This process ensures that all eligible PAPs are captured in a transparent and verifiable manner, forming the basis for compensation and livelihood restoration planning.

### **1.5.4 Socio-Economic Survey**

A detailed socio-economic survey was conducted to establish baseline conditions and assess the potential impacts of displacement on affected persons.

The survey included structured interviews and data collection on:

- Household and individual income levels and sources of livelihood;
- Business operations, turnover, and dependency on site-based activities;
- Tenure arrangements, including formal and informal occupation;
- Household composition and dependency ratios;
- Gender dimensions of impact, including participation of women in waste-related livelihoods;
- Vulnerability factors affecting resilience and recovery capacity.

These findings are consistent with ESIA baseline observations, which highlight the predominance of informal livelihoods, low levels of formal education, and high dependency on waste value chain activities within the project area. The socio-economic data provides the analytical basis for designing targeted livelihood restoration measures and identifying vulnerable groups requiring additional support.

### **1.5.5 Valuation Approach**

Valuation of affected assets and livelihoods was conducted in accordance with AfDB OS5 requirements and internationally accepted valuation principles.

The valuation approach was guided by:

- Replacement cost methodology, ensuring that compensation reflects the full cost of replacing lost assets without depreciation;
- Market-based assessment of structures and physical assets, reflecting prevailing local prices;

- Income-based analysis to inform livelihood restoration measures and transitional support;
- Consultation-based negotiation, ensuring that PAPs are engaged in determining fair and acceptable compensation outcomes.

This approach ensures that compensation and assistance measures are equitable, transparent, and aligned with both national legislation and AfDB safeguard standards.

## **1.6 Structure of the RAP Report**

This RAP is structured in accordance with AfDB requirements and international best practice as follows:

### **CHAPTER 1: INTRODUCTION**

- Background and Project Context
- Purpose of the RAP
- Objectives of the RAP
- Linkages with ESIA and AfDB ISS
- Scope (Geographic, Social, Temporal)
- Methodology
- Structure of the RAP Report

### **CHAPTER 2: PROJECT DESCRIPTION AND RESETTLEMENT TRIGGERS**

- Project Overview
- Project Location and Area of Influence
- Project Components
- Land Requirements
- Activities Triggering Resettlement
- Nature of Displacement
- Avoidance and Minimization Measures

### **CHAPTER 3: LEGAL AND INSTITUTIONAL FRAMEWORK**

- National Legal Framework
- AfDB ISS (OS5)
- Gap Analysis
- Institutional Framework
- Project Coordination Unit (PCU)

### **CHAPTER 4: SOCIO-ECONOMIC BASELINE**

- Area Profile
- Livelihood Systems
- Land Use
- Vulnerability
- Key Risks

## **CHAPTER 5: STAKEHOLDER ENGAGEMENT AND DISCLOSURE**

- Stakeholder mapping
- Summary Consultation
- PAP concerns
- Disclosure of cut-off date

## **CHAPTER 6: GRIEVANCE REDRESS MECHANISM (GRM)**

- Objectives and Principles of the GRM
- GRM Structure and Levels
- Grievance Uptake and Registration
- Grievance Assessment and Resolution Process
- Appeals Process
- GBV/SEA/SH Sensitive Case Handling
- Monitoring and Reporting on Grievances
- Budget for GRM Implementation

## **CHAPTER 6: IMPACT ASSESSMENT AND RESETTLEMENT NEEDS**

- Nature of Project Impacts
- Impact Sensitivity and Exposure
- Spatial Footprint of Impacts
- Magnitude of Impacts
- Vulnerable Groups Impact Analysis
- Livelihood Impact Assessment
- Resettlement Needs Assessment
- Key Findings
- Implications for RAP/LRP Design

## **CHAPTER 8: CENSUS, ASSET INVENTORY AND SOCIO-ECONOMIC SURVEY**

- Objectives of the Census and Asset Inventory
- Methodology and Approach
- Cut-off Date: Definition and Disclosure
- Identification of Project Affected Persons (PAPs)
- Inventory of Affected Assets
- Socio-Economic Characteristics of PAPs
- Summary of Impacts by PAP Category

## **CHAPTER 9: ELIGIBILITY, ENTITLEMENTS AND COMPENSATION 88**

- Cut-Off Date Application

- Entitlement Framework
- Compensation Principles
- Compensation for Specific Assets
- Relocation to New Site
- Transitional Livelihood Support
- Key Risks and Mitigation
- Link to Livelihood Restoration Plan (LRP)

## **CHAPTER 10: LIVELIHOOD RESTORATION PLAN (LRP)**

- Objectives of the LRP
- Livelihood Restoration Strategy
- Livelihood Restoration Measures
- Business Re-Establishment Support
- Integration into Formal Waste and Recycling System
- Transitional Support
- Support for Vulnerable PAPs

## **CHAPTER 11: IMPLEMENTATION APPROACH**

- Institutional Arrangements
- Project Coordination Unit (PCU)
- RAP Implementation Team
- Capacity Requirements
- Implementation Schedule
- Linkages with Other RAP Components
- Reporting and Documentation

## **CHAPTER 12: MONITORING, EVALUATION AND COMPLETION AUDIT**

- Monitoring Approach
- Monitoring Indicators
- Data Collection Methods
- Reporting
- Evaluation of Livelihood Restoration
- Completion Audit
- Corrective Action Mechanism

## **CHAPTER 13: BUDGET AND FINANCING ARRANGEMENTS**

- Budget Principles
- Summary RAP Budget
- Detailed Budget Breakdown
- Financing Arrangements

- Fund Flow and Disbursement
- Budget Monitoring and Control

## **CHAPTER 14: CONCLUSION AND RECOMMENDATIONS**

### **ANNEXES**

## 2. PROJECT DESCRIPTION AND RESETTLEMENT TRIGGERS

This chapter provides a detailed description of the project and establishes the basis for resettlement planning by clearly identifying the activities that give rise to land acquisition, restrictions on land use, and economic displacement. The analysis presented in this chapter is directly informed by the Environmental and Social Impact Assessment (ESIA) for the project, which defines the project scope, location, components, area of influence, and associated environmental and social risks. The ESIA serves as the primary source of technical and contextual information, including baseline conditions, stakeholder engagement outcomes, and the identification of potential impacts on informal livelihoods and waste value chains. In line with the African Development Bank's Integrated Safeguards System (ISS, 2023), particularly Operational Safeguard 5 (OS5), this chapter also establishes the resettlement trigger, demonstrating how project activities will result in economic displacement and potential loss of access to income-generating resources, thereby necessitating the preparation and implementation of this RAP and Livelihood Restoration Plan (LRP). Accordingly, this chapter links project design and implementation activities (as defined in the ESIA) to specific resettlement impacts, forming the basis for subsequent chapters on eligibility, entitlements, compensation, and livelihood restoration.

### 2.1 Project Overview

The Accra Metropolitan Assembly (AMA), with support from international development partners, is implementing a Source-Separated Organic Waste Composting Project aimed at improving municipal solid waste (MSW) management in Accra and promoting a transition toward a circular and climate-resilient urban economy. As detailed in the ESIA, the project is designed to address the growing challenges associated with waste generation in Accra, where organic waste constitutes more than 50% of the total waste stream. Currently, most of this waste is disposed of in landfill sites, where it decomposes under anaerobic conditions, generating methane, a potent greenhouse gas, and contributing to environmental degradation and public health risks. The project seeks to transform this challenge into an opportunity by:

- Promoting source separation of municipal solid waste across multiple sub-metropolitan areas;
- Establishing a composting facility to process organic waste into nutrient-rich compost;
- Reducing greenhouse gas emissions, particularly methane;
- Extending the lifespan of existing landfill sites;
- Supporting urban and peri-urban agriculture through compost production;
- Creating green jobs and economic opportunities, particularly within the waste management value chain.

The proposed composting facility will be located in Jamestown, within the Ashiedu Keteke Sub-Metropolitan Area of Accra, on a 1.77-hectare site adjacent to the Korle Lagoon. The ESIA defines the project's Area of Influence (AoI) to include not only the immediate project footprint but also surrounding areas within approximately a 1-kilometer radius, where indirect and induced impacts may occur. The project will be implemented in phases, as outlined in the ESIA:

- **Pre-Construction Phase:** Feasibility studies, ESIA preparation, land acquisition, stakeholder engagement, and site preparation;
- **Construction Phase:** Development of composting infrastructure, access roads, and associated facilities;

- **Operational Phase:** Processing of organic waste, compost production, and implementation of environmental and social management measures;
- **Decommissioning Phase:** Rehabilitation of the site at the end of project life.

While the project is expected to generate significant environmental and socio-economic benefits, including improved sanitation, reduced emissions, and job creation, the ESIA also identifies adverse social impacts, particularly related to land use and livelihoods. Specifically, the ESIA highlights that the project site is currently utilized by informal waste sector actors, including scrap dealers, waste pickers, and small-scale recyclers, whose livelihoods depend on access to waste materials and site-based economic activities. The establishment of the composting facility will therefore result in:

- Loss of access to the project site and associated resources;
- Disruption of informal waste value chains;
- Economic displacement of site users and value chain actors.

These impacts form the basis for the resettlement triggers discussed in subsequent sections and underscore the need for a structured RAP and Livelihood Restoration Plan to ensure that affected persons are adequately compensated and supported.

## 2.2 Project Location and Area of Influence

This section defines the spatial context of the project and establishes the geographic extent of potential resettlement impacts. The analysis is based on the Environmental and Social Impact Assessment (ESIA), which delineates the project location, footprint, and Area of Influence (AoI) in accordance with international standards. In line with AfDB Operational Safeguard 5 (OS5), the definition of the AoI is critical for identifying all Project Affected Persons (PAPs), including those directly affected by land acquisition as well as those indirectly affected through restrictions on access to resources and disruption of livelihood systems.

### 2.2.1 Project Location

The proposed composting facility is located in Jamestown, within the Ashiedu Keteke Sub-Metropolitan Area of the Accra Metropolitan Assembly (AMA), in the Greater Accra Region of Ghana. The project site is situated at approximately:

- Latitude: 5.543507°
- Longitude: -0.226150°

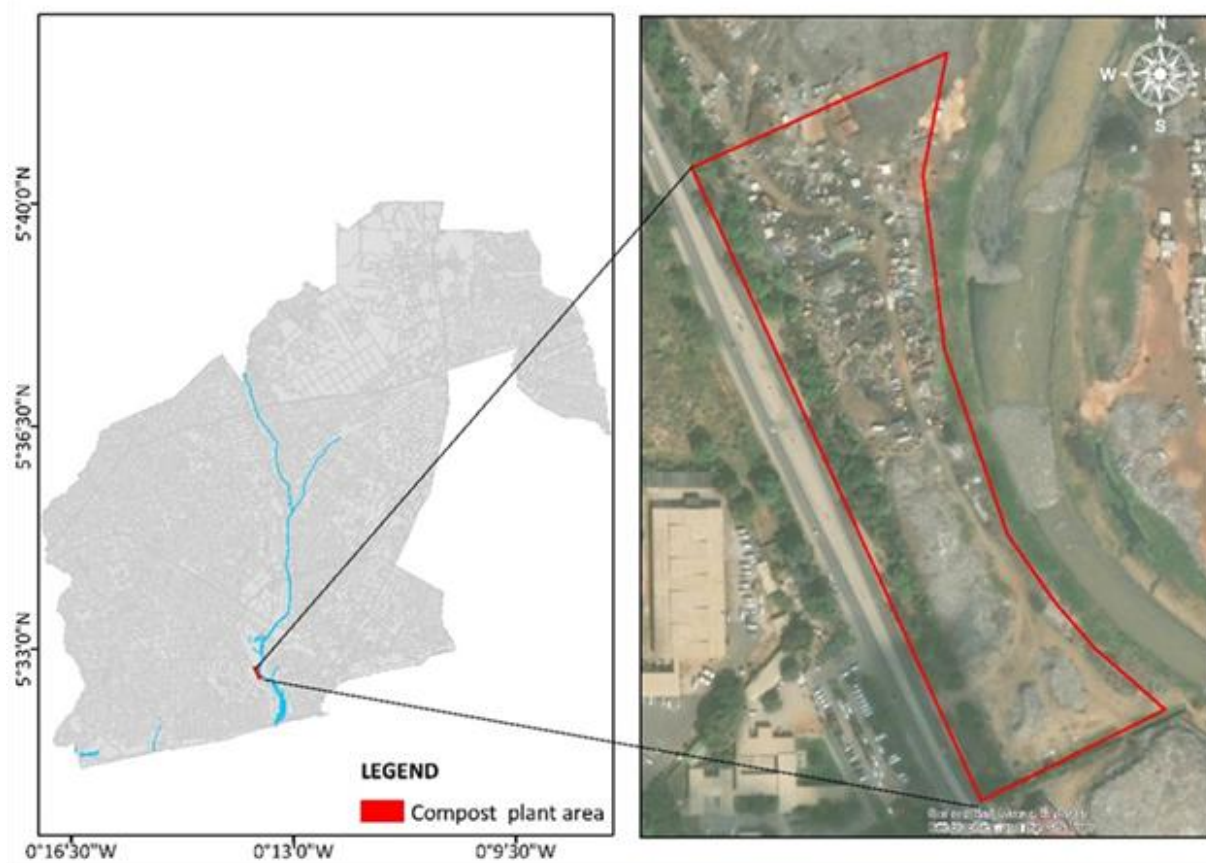
The site lies within a densely populated urban environment characterized by:

- Mixed land use, including residential, commercial, and informal economic activities;
- Proximity to the Korle Lagoon, which is environmentally sensitive and highly polluted;
- Existing informal waste management activities and scrap trading operations;
- High levels of environmental stress, including air and water pollution, as identified in the ESIA baseline assessment.

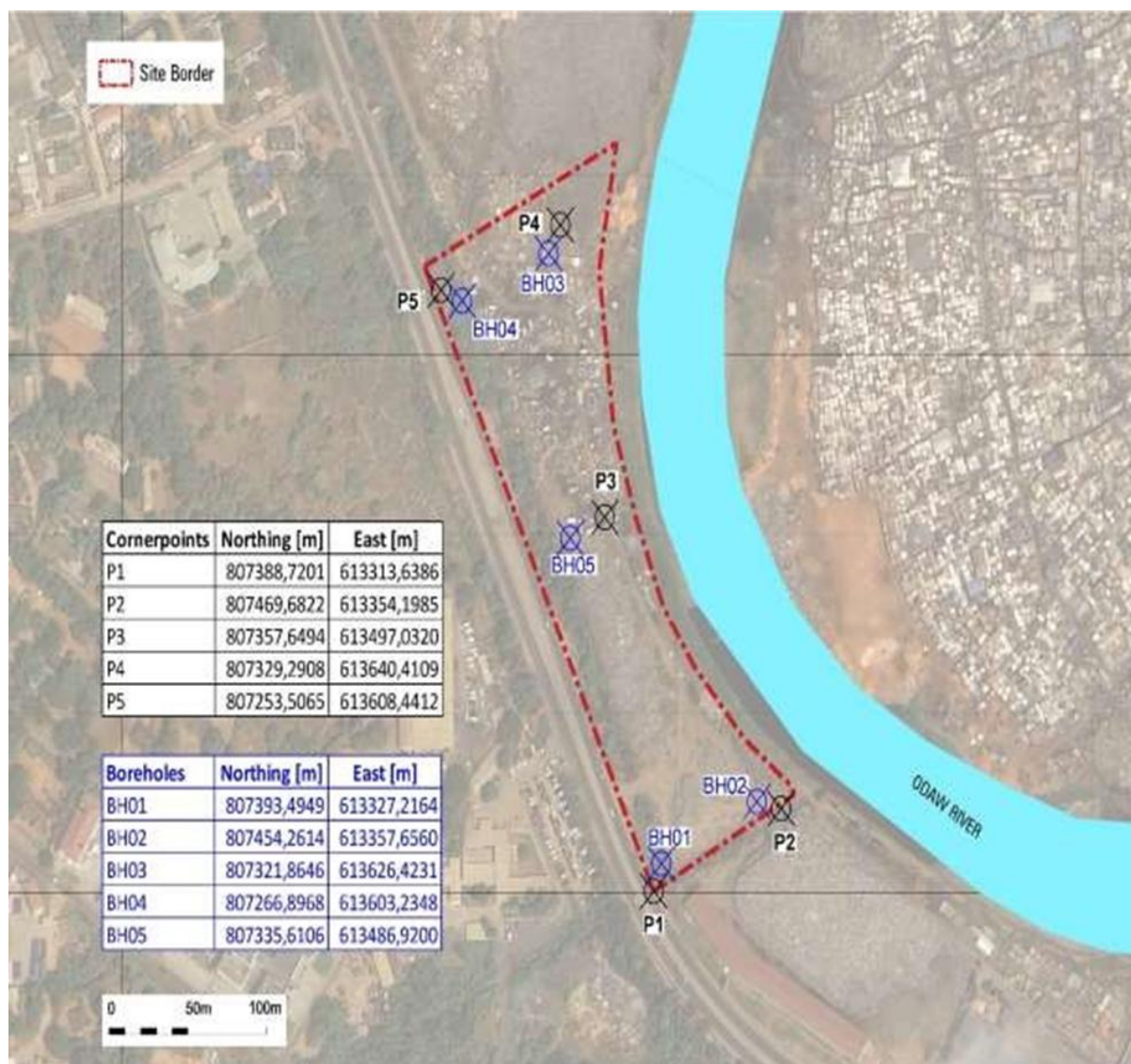
The selection of this location reflects its strategic importance within Accra's waste management system, particularly in relation to waste generation patterns and accessibility to waste collection routes.



**Photo 1: Location of the project and current land use and activities of the project site in Jamestown**



**Figure 1: Location of Proposed Compost Plant within the Accra Metropolitan Area**



**Figure 2: Location of Boreholes relative to the Proposed Compost Plant (Source: Feasibility Study Report, GIZ)**

### 2.2.2 Project Footprint

The core project footprint comprises approximately 1.77 hectares of land designated for the construction and operation of the composting facility .

As defined in the ESIA, this footprint represents the area within which all primary project activities will occur, including:

- Waste reception and sorting areas;
- Composting infrastructure and processing units;
- Storage areas for raw materials and finished compost;
- Internal access roads and operational facilities.

The ESIA confirms that this footprint is currently utilized by informal economic actors, including scrap dealers and waste pickers, who rely on the site for income generation. Consequently, the

acquisition and clearance of this land will result in direct economic displacement, triggering the requirements for this RAP/LRP.

### **2.2.3 Area of Influence (Aoi)**

Beyond the immediate project footprint, the ESIA defines a broader Area of Influence (Aoi), which extends to:

- The project footprint and facility boundary (1.77 hectares);
- Surrounding areas within approximately a 1-kilometer radius from the site boundary;
- Associated facilities and areas where project-induced impacts may occur, including waste collection, transport routes, and downstream waste management activities.

The Aoi includes both direct and indirect impact zones, encompassing:

- Areas where informal waste pickers operate and depend on access to waste streams;
- Locations where scrap dealers and intermediaries engage in sorting, aggregation, and trading of recyclable materials;
- Communities and economic actors potentially affected by changes in waste flow, access restrictions, or formalization of waste management systems.

In accordance with international best practice, the Aoi also considers associated facilities and induced impacts, defined as developments that may not be part of the core project but are necessary for its operation or arise as a consequence of project implementation.

### **2.2.4 Implications for Resettlement Planning**

The ESIA clearly establishes that the project's impacts are not confined to the physical footprint but extend across the broader waste value chain within the Aoi.

Key implications for resettlement planning include:

- Direct impacts within the project footprint, including loss of access to land and economic activities for on-site operators;
- Indirect impacts within the Aoi, including disruption of livelihoods linked to waste collection, sorting, and trading;
- Value chain impacts, particularly for informal actors whose income depends on access to organic and recyclable waste streams.

Accordingly, this RAP/LRP adopts an expanded spatial approach, ensuring that:

- All PAPs within both the project footprint and the wider Aoi are identified and assessed;
- Both directly and indirectly affected persons are considered eligible for assistance, in line with AfDB OS5;
- Livelihood restoration measures address not only site-based impacts but also systemic changes to the waste value chain.

This approach ensures that resettlement planning is comprehensive and aligned with the ESIA's recognition of economic displacement as a value chain-wide impact, rather than a purely site-specific issue. This section describes the key components and implementation phases of the project, based on the Environmental and Social Impact Assessment (ESIA), and establishes how these activities interact with land use, access to resources, and livelihood systems. Understanding the nature, scale, and sequencing of project components is essential for identifying when and how resettlement impacts occur, particularly economic displacement affecting informal waste sector actors. In accordance with AfDB Operational Safeguard 5 (OS5), this analysis provides the

basis for linking project activities to resettlement triggers, which are further elaborated in subsequent sections.

## **2.3 Project Components and Phases**

This section describes the key components and implementation phases of the project, based on the Environmental and Social Impact Assessment (ESIA), and establishes how these activities interact with land use, access to resources, and livelihood systems. Understanding the nature, scale, and sequencing of project components is essential for identifying when and how resettlement impacts occur, particularly economic displacement affecting informal waste sector actors. In accordance with AfDB Operational Safeguard 5 (OS5), this analysis provides the basis for linking project activities to resettlement triggers, which are further elaborated in subsequent sections.

### **2.3.1 Project Components**

As detailed in the ESIA, the project comprises an integrated system for source separation, collection, and processing of organic waste, culminating in the production of compost for agricultural use. The main components of the project include:

- **Source Separation System**  
Implementation of a three-stream waste separation system across participating sub-metropolitan areas, enabling segregation of organic waste at source.
- **Waste Collection and Transport**  
Collection and transportation of source-separated organic waste to the composting facility through an organized municipal system.
- **Composting Facility Infrastructure**  
Development of the composting plant within the 1.77-hectare site, including:
  - Waste reception and sorting areas;
  - Composting units and windrows;
  - Curing and maturation zones;
  - Storage and packaging areas for finished compost;
  - Leachate management systems;
  - Internal roads and operational facilities.
- **Supporting Infrastructure and Utilities**  
Provision of water, energy, and operational support systems required for plant functioning.
- **Environmental and Social Management Measures**  
Implementation of mitigation measures outlined in the ESIA and Environmental and Social Management Plan (ESMP), including occupational health and safety, environmental monitoring, and stakeholder engagement.

These components collectively transform the existing waste management system by formalizing waste collection, processing, and value recovery processes.

### **2.3.2 Project Phases**

The ESIA identifies four main phases of project implementation, each with distinct activities and associated resettlement implications.

### **a) Pre-Construction Phase**

This phase includes:

- Feasibility studies and ESIA preparation;
- Land acquisition and site preparation;
- Stakeholder engagement and awareness creation;
- Planning and rollout of source separation systems.

#### **Resettlement Implications:**

- Initiation of land acquisition processes within the project footprint;
- Identification of Project Affected Persons (PAPs);
- Establishment of cut-off date;
- Potential early displacement of informal site users.

### **b) Construction Phase**

This phase involves:

- Site clearance and preparation;
- Construction of composting infrastructure and access roads;
- Installation of processing systems and utilities;
- Continued stakeholder engagement.

#### **Resettlement Implications:**

- Physical clearance of the site, resulting in loss of access for informal operators;
- Temporary restriction of access to surrounding areas;
- Disruption of ongoing economic activities within and around the project footprint;
- Transitional livelihood impacts requiring temporary support measures.

### **c) Operational Phase**

This phase includes:

- Processing of organic waste into compost;
- Operation and maintenance of the facility;
- Implementation of environmental and social management measures;
- Integration of formal waste management systems.

#### **Resettlement Implications:**

- Permanent changes to access to waste streams, affecting informal waste pickers and recyclers;
- Restructuring of waste value chains, with potential exclusion of informal actors if not properly integrated;
- Long-term livelihood impacts requiring sustained livelihood restoration interventions.

### **d) Decommissioning Phase**

This phase involves:

- Closure of operations at the end of the project lifecycle;
- Rehabilitation and restoration of the site.

#### **Resettlement Implications:**

- Potential temporary employment loss for workers engaged in project operations;
- Limited direct resettlement impacts compared to earlier phases.

### **2.3.3 Linkage Between Project Components and Resettlement Impacts**

The ESIA clearly demonstrates that resettlement impacts are primarily associated with:

- Land acquisition and site clearance during the pre-construction and construction phases;
- Loss of access to livelihood resources, particularly waste materials, during construction and operation;
- Systemic changes in the waste value chain, resulting from formalization of waste management systems.

These impacts are concentrated among informal economic actors, including scrap dealers, waste pickers, and small-scale recyclers, whose livelihoods depend on access to the project site and associated waste flows. Accordingly, the project components and phases give rise to economic displacement as the primary resettlement trigger, consistent with the findings of the ESIA.

## **2.4 Land Requirements for the Project**

This section defines the land requirements of the project and provides the justification for land acquisition, in line with the findings of the Environmental and Social Impact Assessment (ESIA). It establishes the extent of land-take, its current use, and the rationale for site selection, while assessing whether land acquisition has been avoided or minimized to the extent feasible, as required under AfDB Operational Safeguard 5 (OS5). The analysis presented herein is critical to demonstrating that land acquisition is necessary, proportionate, and appropriately planned, and that resulting impacts, particularly economic displacement, are clearly understood and addressed through this RAP and Livelihood Restoration Plan (LRP).

### **2.4.1 Land-Take Requirements**

As confirmed in the ESIA, the project requires a total land area of approximately 1.77 hectares for the construction and operation of the composting facility in Jamestown, Accra. This land area constitutes the core project footprint, within which all primary project activities will be undertaken, including:

- Waste reception and sorting areas;
- Composting units and processing zones;
- Curing, storage, and packaging facilities;
- Internal circulation roads and operational infrastructure;
- Environmental management systems such as leachate control and drainage.

The ESIA further defines this footprint as the area under direct control of the project, where all construction and operational activities will occur.

### **2.4.2 Current Land Use and Occupation**

The ESIA indicates that the project site is currently characterized by informal and unregulated land use, primarily associated with waste-related economic activities.

Key existing land uses include:

- Informal scrap dealing and recycling activities;
- Waste picking and sorting operations;
- Temporary structures used for storage and trading of recyclable materials;
- Open waste disposal and aggregation areas.

These activities are undertaken predominantly by informal economic actors, including scrap dealers, waste pickers, and intermediaries within the waste value chain. While many of these users may not have formal land tenure rights, they are economically dependent on the site for their livelihoods. The ESIA baseline further highlights that such informal waste sector activities are widespread within the project area and are a critical source of income, particularly for vulnerable populations with limited alternative livelihood opportunities.

#### **2.4.3 Justification of Land Acquisition**

The selection of the 1.77-hectare site is justified in the ESIA based on technical, environmental, and logistical considerations, including:

- Proximity to major waste generation zones within the Accra Metropolitan Area;
- Accessibility to existing waste collection and transportation routes;
- Suitability of the site for composting operations, including space requirements for processing and storage;
- Strategic location within the municipal waste management system to support efficient operations.

The ESIA also indicates that alternative site options and design considerations were assessed as part of the project planning process, with the selected site representing a feasible and operationally efficient option within the urban context. In line with AfDB OS5 requirements, the project has sought to avoid and minimize land acquisition to the extent practicable by:

- Limiting the footprint to the minimum area required for operational efficiency;
- Utilizing a site already associated with waste-related activities;
- Avoiding displacement of formal residential settlements to the extent possible.

#### **2.4.4 Implications of Land Acquisition**

Despite efforts to minimize land-take, the ESIA confirms that acquisition of the project site will result in loss of access to land and associated economic resources for existing users.

The primary implications include:

- Displacement of informal economic activities currently taking place within the site;
- Loss of access to waste materials that form the basis of livelihoods for scrap dealers and waste pickers;
- Removal of temporary structures used for business operations;
- Disruption of established informal waste value chains.

These impacts constitute economic displacement, as defined under AfDB OS5, even in the absence of large-scale physical relocation.

#### **2.4.5 Link to Resettlement Requirements**

The ESIA clearly establishes that land acquisition for the project will result in economic displacement of informal site users, thereby triggering the requirements for the preparation and implementation of a RAP and Livelihood Restoration Plan.

In accordance with AfDB OS5:

- All affected persons, including informal and non-title holders, are eligible for assistance;
- Compensation must be provided at full replacement cost;

- Livelihood restoration measures must be implemented to ensure that affected persons are able to restore or improve their income levels.

Accordingly, this RAP/LRP provides the framework for addressing all impacts arising from land acquisition, ensuring that project development proceeds in a socially responsible and inclusive manner, consistent with ESIA commitments and AfDB safeguard requirements.

## **2.5 Activities Triggering Resettlement**

This section identifies and analyzes the specific project activities that give rise to resettlement impacts, in accordance with the Environmental and Social Impact Assessment (ESIA) and the requirements of the African Development Bank's Integrated Safeguards System (ISS, 2023), particularly Operational Safeguard 5 (OS5). While the project does not involve large-scale physical displacement of residential households, the ESIA confirms that several project activities will result in economic displacement, particularly affecting informal waste sector actors operating within and around the project site. In line with OS5, economic displacement, including loss of access to land, assets, and income-generating opportunities, constitutes a resettlement trigger requiring the preparation and implementation of a RAP and Livelihood Restoration Plan (LRP). The key activities triggering resettlement impacts are outlined below.

### **2.5.1 Site Clearance**

The clearance of the project site during the pre-construction and construction phases represents the primary activity triggering resettlement impacts. As identified in the ESIA, the project footprint (1.77 hectares) is currently occupied by informal economic actors engaged in waste-related activities, including scrap dealing, waste picking, and material sorting.

Site clearance will involve:

- Removal of all existing structures (temporary and semi-permanent);
- Clearing of accumulated waste materials and working areas;
- Preparation of land for construction of composting infrastructure.

#### **Resettlement Implications:**

- Loss of access to the physical space used for income-generating activities;
- Destruction or removal of business-related assets and structures;
- Immediate disruption of livelihoods dependent on site-based operations.

This activity results in direct economic displacement, as affected persons lose both their operational base and access to productive resources.

### **2.5.2 Removal of Informal Operators**

The implementation of the project will require the relocation or displacement of informal operators currently utilizing the site, as confirmed by the ESIA social impact assessment.

These operators include:

- Scrap dealers and recyclers;
- Informal waste pickers;
- Small-scale intermediaries within the waste value chain.

The ESIA highlights that these groups are highly dependent on daily access to waste materials and site-based activities for their livelihoods, often with limited alternative income sources and minimal social protection.

**Resettlement Implications:**

- Loss of established business locations and trading networks;
- Disruption of income flows and customer relationships;
- Increased vulnerability, particularly among women and marginalized groups;
- Need for relocation support and livelihood restoration interventions.

Although many of these actors may not hold formal land rights, they are recognized under AfDB OS5 as eligible for assistance due to their economic dependence on the affected area.

**2.5.3 Restriction of Access to Waste Streams**

A key impact identified in the ESIA is the restriction of access to waste materials, resulting from the formalization of waste collection and processing systems under the project.

The introduction of source-separated waste management and controlled waste flows will:

- Limit informal access to organic and recyclable waste streams;
- Redirect waste through formal collection and processing systems;
- Reduce opportunities for informal recovery, sorting, and resale of materials.

**Resettlement Implications:**

- Loss of access to critical livelihood resources (waste materials);
- Reduced income-generating opportunities for informal waste pickers and recyclers;
- Structural changes to the waste value chain, potentially excluding informal actors if not integrated.

This represents a form of indirect economic displacement, as livelihoods are affected not only by physical removal from the site but also by systemic changes in access to resources.

**2.5.4 Summary of Resettlement Triggers**

Based on the ESIA analysis, the primary resettlement trigger for this project is economic displacement, arising from:

- Loss of access to land and workspace;
- Loss of access to waste materials and livelihood resources;
- Disruption of informal economic systems and value chains.

These impacts occur across both the project footprint and the broader Area of Influence, reinforcing the need for a comprehensive RAP and Livelihood Restoration Plan.

**2.5.5 Link to RAP/LRP Requirements**

In accordance with AfDB OS5, the above activities necessitate the preparation and implementation of a RAP/LRP to ensure that:

- All affected persons are identified and enumerated;
- Compensation is provided at full replacement cost where applicable;
- Livelihood restoration measures are implemented to restore or improve income levels;
- Vulnerable groups receive targeted support;
- A functional Grievance Redress Mechanism (GRM) is established;
- Implementation is subject to monitoring and completion audit.

This RAP/LRP therefore provides the structured framework for addressing all resettlement impacts arising from project activities, ensuring compliance with ESIA commitments and AfDB safeguard requirements.

## **2.6 Nature and Types of Displacement**

This section characterizes the nature and types of displacement associated with the project, based on the findings of the Environmental and Social Impact Assessment (ESIA) and in accordance with the definitions provided under the African Development Bank's Integrated Safeguards System (ISS, 2023), particularly Operational Safeguard 5 (OS5). The ESIA confirms that project impacts are predominantly related to loss of access to livelihoods and economic resources, rather than large-scale physical relocation of residential households. However, localized physical displacement of temporary structures may occur within the project footprint. In line with OS5, both economic and physical displacement, whether temporary or permanent, are recognized as resettlement impacts requiring appropriate mitigation measures under this RAP and Livelihood Restoration Plan (LRP).

### **2.6.1 Economic Displacement (Primary Impact)**

The ESIA identifies economic displacement as the primary form of impact associated with the project. Economic displacement arises from:

- Loss of access to land and workspace within the project footprint (1.77 hectares);
- Loss of access to waste materials that constitute the primary livelihood resource;
- Disruption of informal waste value chains due to formalization of waste management systems;
- Temporary or permanent interruption of income-generating activities.

The affected population consists predominantly of:

- Scrap dealers and recyclers;
- Informal waste pickers;
- Small-scale traders and intermediaries operating within the waste value chain.

These groups are highly dependent on daily access to waste streams and site-based operations, as highlighted in the ESIA socio-economic baseline.

#### **Nature of Economic Displacement:**

- Permanent economic displacement resulting from loss of access to the project site;
- Transitional income loss during construction and relocation;
- Structural livelihood disruption due to changes in waste flow and access conditions.

In accordance with AfDB OS5, all economically displaced persons, including those without formal land rights, are entitled to:

- Livelihood restoration assistance;
- Transitional support;
- Inclusion in benefit-sharing or economic integration opportunities where feasible.

### **2.6.2 Physical Displacement (Limited and Localized)**

While the ESIA does not indicate residential displacement, there is potential for limited physical displacement associated with the removal of temporary and semi-permanent structures within the project footprint. These include:

- One makeshift shelters used for scrap trading and meeting grounds;
- Two temporary business structures constructed from wood, metal sheets, or other materials;

**Nature of Physical Displacement:**

- Displacement is expected to be non-residential and limited to economic structures;
- Affected persons may require relocation of business structures to alternative sites;
- Impacts are likely to be localized and manageable, but still require full compliance with OS5.

In line with AfDB requirements:

- Affected persons will be entitled to compensation at replacement cost for structures;
- Relocation assistance will be provided where necessary;
- Physical displacement impacts will be addressed alongside livelihood restoration measures.

### 2.6.3 Temporary vs. Permanent Impacts

The ESIA indicates that resettlement impacts may occur across different timeframes:

- **Permanent Impacts:**
  - Loss of access to the project site;
  - Long-term restructuring of waste value chains;
  - Permanent changes in livelihood systems.
- **Temporary Impacts:**
  - Short-term disruption during construction activities;
  - Temporary restriction of access to surrounding areas;
  - Transitional loss of income prior to full livelihood restoration.

This distinction is critical for designing appropriate mitigation measures, including:

- Transitional allowances for temporary income loss;
- Long-term livelihood restoration programs for permanent impacts.

### 2.6.4 Implications for RAP and Livelihood Restoration Planning

The predominance of economic displacement, combined with limited physical displacement, requires a livelihood-centered resettlement approach, as reflected in this RAP/LRP.

Key implications include:

- Strong emphasis on income restoration and economic reintegration, rather than housing replacement;
- Integration of informal waste sector actors into the formalized waste management system, where feasible;
- Provision of targeted support to vulnerable groups, including women and youth engaged in informal activities;
- Design of flexible and adaptive livelihood restoration measures aligned with evolving waste management systems.

This approach ensures that the RAP/LRP responds effectively to the specific nature of displacement identified in the ESIA, while meeting the requirements of AfDB OS5.

### 3. LEGAL AND INSTITUTIONAL FRAMEWORK

This chapter outlines the legal, regulatory, and institutional framework governing land acquisition, compensation, and resettlement for the project. It provides the basis for ensuring that the Resettlement Action Plan (RAP) and Livelihood Restoration Plan (LRP) are implemented in compliance with both national legislation and the African Development Bank's Integrated Safeguards System (ISS, 2023), particularly Operational Safeguard 5 (OS5). The Environmental and Social Impact Assessment (ESIA) confirms that the project will result primarily in economic displacement of informal waste sector actors, including scrap dealers, waste pickers, and small-scale recyclers operating within the project footprint and Area of Influence. These impacts require careful alignment between Ghana's legal provisions and international safeguard requirements, particularly in relation to compensation, livelihood restoration, and the treatment of persons without formal land tenure. This chapter therefore:

- Reviews the applicable national legal framework governing land acquisition and compensation;
- Examines the institutional arrangements responsible for implementation;
- Identifies gaps between national legislation and AfDB OS5 requirements;
- Establishes the principle that, where gaps exist, the higher standard (AfDB OS5) will apply.

#### 3.1 National Legal Framework

This section presents the key national laws and regulations relevant to land acquisition, compensation, environmental assessment, and resettlement in Ghana. It provides the legal foundation for addressing project-induced displacement, as identified in the ESIA. Particular attention is given to the treatment of **informal land users**, including squatters, waste pickers, and other non-title holders, who constitute a significant proportion of Project Affected Persons (PAPs) within the project area. While Ghanaian law provides clear provisions for compensation for persons with legally recognized interests in land, it offers limited statutory protection for informal occupants. This section therefore examines the extent to which national legislation addresses:

- Compulsory acquisition and public interest justification;
- Compensation for land, structures, and economic assets;
- Eviction and removal of unauthorized occupants;
- Environmental and social assessment requirements.

The analysis also provides the basis for the subsequent gap assessment with AfDB OS5, ensuring that all affected persons are adequately protected under this RAP/LRP.

##### 3.1.1 The 1992 Constitution of the Republic of Ghana (Article 20)

The 1992 Constitution of the Republic of Ghana, under Article 20, provides the fundamental legal basis for compulsory acquisition of property by the State.

Article 20 stipulates that:

- No property shall be compulsorily taken possession of or acquired except where it is necessary in the interest of defense, public safety, public order, public morality, public health, or for the development or utilization of property for a public purpose;
- Such acquisition must be carried out under a law that provides for the prompt payment of fair and adequate compensation;

- Affected persons must be granted access to the High Court for redress, including the determination of their interest and compensation.

### **Implications for the Project:**

As established, the composting facility project constitutes a public purpose intervention, aimed at improving waste management, environmental sanitation, and climate resilience. It therefore satisfies the constitutional requirement for compulsory acquisition. However, Article 20 primarily protects persons with legally recognized interests in property. It does not explicitly extend compensation rights to:

- Informal occupants;
- Squatters or slum dwellers;
- Persons without legally recognized land tenure.

Given that the RAP identifies the majority of site users as informal waste sector actors without formal land rights, this creates a gap in protection under national law, which is addressed through the application of AfDB OS5 in this RAP.

### **3.1.2 Lands Act, 2020 (Act 1036)**

The Lands Act, 2020 (Act 1036) consolidates Ghana's land laws and provides detailed procedures for land administration, compulsory acquisition, and compensation.

#### **a) Compulsory Acquisition and Compensation**

Under the Act:

- The State may acquire land for a public purpose, subject to due process;
- Compensation is payable to persons with legal or customary interests in land;
- Compensation may include:
  - Land value;
  - Structures and immovable assets;
  - Crops and economic trees;
  - Disturbance and incidental expenses.

#### **b) Treatment of Informal Occupants (Squatters and Slum Dwellers)**

The Lands Act does not recognize informal occupants without legal or customary title as eligible for land compensation.

In practice:

- Such occupants may be classified as encroachers or unauthorized users of land;
- They may be subject to eviction or removal where land is required for public purposes;
- Eviction processes are typically undertaken by relevant authorities (e.g., Metropolitan or Municipal Assemblies), often involving:
  - Notice of eviction;
  - Physical removal of structures;
  - Enforcement through local authorities where necessary.

While the law does not mandate compensation for land in such cases:

- Affected persons may receive compensation for structures or improvements where recognized;
- Authorities may provide ex gratia support, relocation assistance, or humanitarian measures, but these are discretionary and not legally guaranteed.

#### **c) Implications for the Project**

This RAP confirms that the project site is occupied predominantly by:

- Scrap dealers;
- Waste pickers;
- Informal recyclers.

These groups generally operate without formal land tenure and would therefore have limited entitlement under national law, particularly in relation to land compensation. However, they remain economically dependent on the site and are therefore considered economically displaced persons. This highlights a key limitation of national legislation, necessitating the application of AfDB OS5, which ensures that:

- All affected persons, including non-title holders, are eligible for assistance;
- Livelihood restoration measures are implemented irrespective of legal tenure status.

### **3.1.3 Environmental Protection (Environmental Assessment) Regulations, 2025 (LI 2504)**

The Environmental Protection (Environmental Assessment) Regulations, 2025 (LI 2504) provide the regulatory framework for environmental and social impact assessment in Ghana.

#### **a) Key Provisions**

LI 2504 requires that:

- Projects with significant environmental and social impacts must undergo an Environmental and Social Impact Assessment (ESIA);
- The ESIA must identify, assess, and propose mitigation measures for social impacts, including:
  - Loss of livelihoods;
  - Impacts on vulnerable groups;
  - Community health and safety risks;
- Public consultation and stakeholder engagement must be conducted throughout the project lifecycle;
- Environmental and social management measures must be formalized through instruments such as:
  - Environmental and Social Management Plans (ESMPs);
  - Resettlement Action Plans (RAPs), where displacement is identified.

#### **b) Linkage to the Project ESIA**

In compliance with LI 2504, the ESIA for the composting project identified:

- Economic displacement of informal waste sector actors;
- Risks associated with disruption of waste value chains;
- Vulnerability of affected groups, including women and low-income operators;
- The need for structured mitigation measures, including the preparation of a RAP and Livelihood Restoration Plan.

#### **c) Implications for the RAP**

LI 2504 provides the procedural and regulatory basis for the preparation of this RAP/LRP by:

- Requiring the identification and assessment of social impacts;
- Mandating stakeholder consultation and disclosure;

- Supporting the development of mitigation instruments aligned with international standards.

However, while LI 2504 requires the preparation of RAPs where necessary, it does not prescribe detailed standards for:

- Livelihood restoration;
- Compensation at replacement cost;
- Assistance to non-title holders.

These aspects are therefore strengthened through alignment with AfDB OS5 within this RAP.

### **3.2 Social Protection Policies and Strategies**

In addition to the legal and regulatory framework governing environmental management, land use, compensation, and resettlement, several national social protection policies and strategies are relevant to the implementation of this Resettlement Action Plan (RAP). These policies provide guidance for protecting livelihoods, promoting social inclusion, reducing poverty, strengthening resilience, and supporting individuals whose economic activities may be affected by development projects. The relevance of these policies is particularly important for this project because the primary impact is economic displacement affecting informal sector operators, including scrap dealers, waste pickers, informal workers, and small-scale traders. The RAP has therefore been developed to align not only with legal requirements but also with Ghana's broader social protection objectives.

#### **3.2.1 National Social Protection Policy (NSPP)**

The National Social Protection Policy provides the overall framework for reducing poverty, vulnerability, and social exclusion in Ghana. The policy seeks to ensure that vulnerable populations have access to opportunities, resources, and support systems that improve their resilience and well-being.

##### **Relevance to the RAP**

The RAP aligns with the objectives of the National Social Protection Policy by ensuring that Project Affected Persons (PAPs) who experience economic displacement receive appropriate assistance to restore their livelihoods and maintain their income-generating activities. The relocation support, livelihood restoration measures, grievance redress mechanism, and stakeholder engagement processes proposed under this RAP are consistent with the policy's objective of protecting individuals from economic shocks and livelihood disruptions.

#### **3.2.2 National Social Protection Strategy (NSPS)**

The National Social Protection Strategy promotes coordinated interventions aimed at addressing poverty, vulnerability, and livelihood insecurity. The strategy emphasizes livelihood enhancement, social inclusion, and support for individuals engaged in informal economic activities.

##### **Relevance to the RAP**

The RAP incorporates livelihood restoration measures designed to ensure that affected persons are able to resume and sustain their economic activities following relocation. The strategy's principles are reflected in the provision of relocation assistance, business re-establishment

support, integration into improved waste management systems, and transitional support measures where necessary.

### **3.2.3 National Gender Policy**

The National Gender Policy seeks to promote gender equality, equitable access to opportunities, and the mainstreaming of gender considerations in development planning and implementation. The policy encourages inclusive participation in decision-making processes and equal access to economic opportunities.

#### **Relevance to the RAP**

The RAP implementation process will ensure that all PAPs, irrespective of gender, have equal access to information, consultations, compensation processes, grievance mechanisms, and livelihood restoration opportunities. Stakeholder engagement activities will be conducted in an inclusive manner to ensure meaningful participation by both men and women affected by the project.

### **3.2.4 National Employment Policy**

The National Employment Policy aims to promote productive employment, sustainable livelihoods, and decent work opportunities, particularly within the informal sector which constitutes a significant component of Ghana's economy.

#### **Relevance to the RAP**

Many PAPs affected by the project derive their livelihoods from informal economic activities linked to waste recovery, recycling, scrap trading, and support services. The RAP supports the objectives of the National Employment Policy by promoting livelihood continuity, supporting business re-establishment, facilitating access to markets, and minimizing employment disruption during the relocation process.

### **3.2.5 National Medium-Term Development Policy Framework**

Ghana's national development frameworks emphasize inclusive economic growth, poverty reduction, environmental sustainability, job creation, and improved living conditions for citizens. These frameworks recognize the need to balance infrastructure development and environmental improvements with social protection and livelihood security.

#### **Relevance to the RAP**

The RAP contributes to these national development objectives by ensuring that project implementation does not result in impoverishment of affected persons and by supporting sustainable livelihood restoration. The project is expected to generate broader environmental and public health benefits while ensuring that those affected by economic displacement are adequately supported.

### **3.2.6 Relevance of Social Protection Policies to RAP Implementation**

The social protection policies and strategies discussed above complement the legal and institutional framework governing resettlement and livelihood restoration. Collectively, they emphasize the importance of:

- preventing impoverishment resulting from development projects;
- protecting income-generating opportunities and livelihoods;

- promoting social inclusion and equitable treatment;
- strengthening resilience and adaptive capacity;
- supporting sustainable economic recovery following displacement; and
- ensuring meaningful stakeholder participation in decision-making.

Accordingly, this RAP has been designed not only to comply with AfDB Operational Safeguard 5 (OS5) and national legal requirements but also to support Ghana's broader social protection objectives by ensuring that PAPs are assisted to restore, and where possible improve, their livelihoods and socio-economic conditions following relocation.

### 3.3 AfDB Integrated Safeguards System (ISS, 2023) - Operational Safeguard 5 (OS5)

In addition to national legislation, this RAP and Livelihood Restoration Plan (LRP) is guided by the African Development Bank's Integrated Safeguards System (ISS, 2023), particularly Operational Safeguard 5 (OS5): Land Acquisition, Involuntary Resettlement and Economic Displacement. As established in the ESIA, the project will result primarily in economic displacement of informal waste sector actors, including scrap dealers and waste pickers. These impacts fall squarely within the scope of OS5, which applies to both physical and economic displacement, regardless of the legal status of affected persons. OS5 establishes international best practice standards for managing resettlement impacts and ensures that development projects are implemented in a manner that is socially inclusive, equitable, and sustainable.

#### 3.3.1 Core Principles of OS5

The key principles of OS5 reflected in this RAP/LRP include:

- **Avoidance and Minimization of Displacement**  
Projects must explore all feasible alternatives to avoid displacement and, where unavoidable, minimize its scale and impacts.
- **Compensation at Full Replacement Cost**  
Affected persons must be compensated for lost assets at full replacement cost, without depreciation, including transaction costs.
- **Livelihood Restoration and Improvement**  
Economically displaced persons must be assisted to restore, and preferably improve, their livelihoods and standards of living.
- **Inclusion of All Affected Persons (Including Non-Title Holders)**  
Eligibility for assistance is not limited to those with legal land rights. Informal occupants, squatters, and users of land are entitled to support.
- **Meaningful Consultation and Participation**  
Affected persons must be engaged through continuous, inclusive, and culturally appropriate consultation processes.
- **Special Assistance to Vulnerable Groups**  
Targeted measures must be implemented for vulnerable populations, including women, youth, the elderly, and persons with disabilities.
- **Grievance Redress Mechanism (GRM)**  
Accessible and transparent mechanisms must be established to address complaints and disputes.

- **Monitoring, Evaluation, and Completion Audit**  
RAP implementation must be monitored, and a completion audit must confirm that objectives have been achieved.

### 3.4 Gap Analysis: Ghanaian Legal Framework vs AfDB OS5

This section presents a comparative analysis between Ghana's national legal framework and AfDB OS5 requirements, with the objective of identifying gaps and establishing the applicable standard for this RAP. As assessed, the majority of Project Affected Persons (PAPs) are informal waste sector actors without formal land tenure, making this gap analysis particularly critical.

**Table 1: Key Gaps - Ghanaian Legal Framework vs AfDB OS5**

| Issue                  | Ghanaian Legal Framework                                            | AfDB OS5 Requirement                                            | Gap Identified                              |
|------------------------|---------------------------------------------------------------------|-----------------------------------------------------------------|---------------------------------------------|
| Eligibility            | Compensation limited to persons with legal or customary land rights | All affected persons, including non-title holders, are eligible | Informal actors excluded under national law |
| Compensation           | Based on market value (may include depreciation)                    | Full replacement cost without depreciation                      | Risk of under-compensation                  |
| Livelihood Restoration | Not systematically required                                         | Mandatory livelihood restoration and improvement                | Major gap                                   |
| Informal Occupants     | May be evicted without compensation for land                        | Must be assisted and supported                                  | Protection gap                              |
| Consultation           | Required under ESIA regulations                                     | Continuous, meaningful consultation required                    | Partial alignment                           |
| Vulnerable Groups      | Limited explicit provisions                                         | Targeted support required                                       | Gap in structured support                   |
| Monitoring & Audit     | Not always required                                                 | Mandatory monitoring and completion audit                       | Gap                                         |

#### 3.4.1 Application of the Higher Standard

In line with AfDB financing requirements:

Where there is a discrepancy between national legislation and AfDB OS5, the higher standard shall apply.

Accordingly, this RAP/LRP adopts AfDB OS5 standards to ensure that:

- Informal waste sector actors are fully recognized as PAPs;
- Compensation is provided at replacement cost;
- Livelihood restoration is central to resettlement planning;
- Vulnerable groups receive targeted assistance;
- Implementation is subject to robust monitoring and evaluation.

This approach ensures compliance with both the ESIA commitments and AfDB safeguard requirements.

### **3.5 Institutional Framework**

Effective implementation of this RAP/LRP requires a clearly defined institutional framework, with roles and responsibilities aligned with both national mandates and project-specific requirements, as outlined in the ESIA and the project's Terms of Reference (EOI).

The institutions involved in RAP implementation include national, metropolitan, and project-level entities.

#### **3.5.1 Key Institutions and Roles**

##### **Accra Metropolitan Assembly (AMA) - Lead Implementing Agency**

- Overall responsibility for project implementation;
- Lead coordination of RAP/LRP implementation;
- Engagement with affected communities and stakeholders;
- Oversight of compensation and livelihood restoration processes.

##### **Lands Commission**

- Verification of land ownership and tenure status;
- Support in valuation of affected assets;
- Advisory role on land acquisition procedures.

##### **Ministry of Finance**

- Mobilization and allocation of funds for compensation and RAP implementation;
- Financial oversight and accountability.

##### **Environmental Protection Authority (EPA)**

- Regulatory oversight of ESIA compliance;
- Monitoring of environmental and social commitments, including RAP implementation;
- Approval and supervision of safeguard instruments.

### **3.6 Project Coordination Unit (PCU)**

To ensure effective and coordinated implementation of the RAP/LRP, a dedicated Project Coordination Unit (PCU) will be established within the project structure, consistent with ESIA recommendations and EOI requirements.

#### **Role of the PCU**

The PCU will serve as the central implementation body for the RAP/LRP and will be responsible for:

- Day-to-day coordination of RAP activities;
- Supervision of census validation, compensation, and livelihood restoration programs;
- Coordination with AMA, EPA, Lands Commission, and other stakeholders;
- Management of stakeholder engagement processes;
- Oversight of the Grievance Redress Mechanism (GRM);
- Monitoring, reporting, and documentation of RAP implementation progress.

**Capacity Requirements**

The PCU will include:

- Environmental and Social Safeguards Specialists;
- Livelihood Restoration/Community Development Experts;
- Monitoring and Evaluation Specialists;
- Administrative and financial support staff.

As highlighted in the ESIA, capacity strengthening may be required to ensure effective RAP implementation, including training on:

- AfDB OS5 requirements;
- Livelihood restoration programming;
- Stakeholder engagement and grievance handling.

#### **4. SOCIO-ECONOMIC BASELINE**

This chapter presents the socio-economic baseline conditions of the project area, based on the findings of the Environmental and Social Impact Assessment (ESIA). It provides a comprehensive understanding of the demographic, economic, and livelihood characteristics of the communities and individuals within the project's Area of Influence (AoI), particularly those directly and indirectly affected by the project. The ESIA identifies that the project area, located in Jamestown within the Ashiedu Keteke Sub-Metropolitan Area, is characterized by dense urban settlement patterns, high levels of informality, and strong dependence on waste-related economic activities. These baseline conditions are critical for understanding the nature and severity of resettlement impacts, particularly economic displacement. The information presented in this chapter forms the basis for:

- Identification of Project Affected Persons (PAPs);
- Design of compensation and livelihood restoration measures;
- Identification of vulnerable groups requiring targeted support.

##### **4.1 Area Profile (Jamestown / Ashiedu Keteke)**

This section provides a detailed overview of the socio-economic, geographic, and institutional characteristics of the project area, drawing on the Environmental and Social Impact Assessment (ESIA), national statistics from the Ghana Statistical Service (GSS, 2021), and relevant secondary sources. The analysis situates the project within the broader urban, economic, and cultural context of Jamestown and the Ashiedu Keteke Sub-Metropolitan Area, highlighting the underlying vulnerabilities and structural conditions that shape resettlement risks.

##### **4.1.1 Location and Administrative Context**

The project is located in Jamestown, within the Ashiedu Keteke Sub-Metropolitan District of the Accra Metropolitan Assembly (AMA), in the Greater Accra Region of Ghana.

Ashiedu Keteke, commonly referred to as part of Old Accra or Ga Mashie, is:

- A historic coastal district situated along the Gulf of Guinea;
- The administrative and commercial heartland of Accra, hosting the Central Business District (CBD);
- A sub-metropolitan district corresponding to the Odododiodioo constituency.

The district includes key historic settlements such as:

- Jamestown (British Accra);
- Usshertown (Dutch Accra);

Collectively forming what is widely known as Old Accra (Ga Mashie), the cultural nucleus of the Ga people.

##### **4.1.2 Geographic and Spatial Characteristics**

The Ashiedu Keteke Sub-Metro covers an estimated land area of approximately 2.89 km<sup>2</sup>, making it one of the smallest yet most densely utilized districts in Accra.

It is bounded by:

- Gulf of Guinea to the south;
- Ablekuma South to the west;
- Ablekuma Central to the north;

- Osu Klottey to the east.

Key areas within the sub-metro include:

- Jamestown and Ussherstown;
- Old Fadama (Sodom and Gomorrah);
- Salaha and surrounding urban settlements.

The ESIA confirms that the project site is located within this highly constrained and intensively used urban space, where land competition is high and informal land use is widespread.

#### **4.1.3 Demographic and Socio-Economic Profile**

The Ashiedu Keteke Sub-Metro is characterized by extreme population density and significant socio-economic pressures.

- Jamestown alone is estimated to host approximately 80,000 residents within a highly compact area;
- The broader district experiences a daily influx of up to 2 million people, due to its role as Accra's commercial and administrative hub;
- The population is predominantly low-income, with high levels of informal employment and limited access to formal economic opportunities.

According to the Ghana Statistical Service (GSS, 2021):

- Urban districts such as Ashiedu Keteke exhibit high rates of overcrowding, particularly in compound houses and informal settlements;
- A significant proportion of the population is engaged in the informal economy, including petty trading, artisanal work, and waste-related activities;
- Youth unemployment and underemployment remain critical socio-economic challenges.

#### **4.1.4 Economic Profile and Livelihood Systems**

The Ashiedu Keteke area presents a paradox of high commercial value alongside deep urban poverty. Key economic characteristics include:

- Presence of Accra's Central Business District (CBD), including major financial institutions, administrative offices, and markets such as Makola;
- Dominance of informal economic activities, including petty trading, scrap dealing, and waste picking;
- Strong dependence on fishing and fishmongering, centered around the Jamestown Fishing Harbour.

Recent infrastructure developments, such as the modern Jamestown Fishing Harbour, have introduced:

- Fish markets and cold storage facilities;
- Ice-making plants and improved landing infrastructure;
- Opportunities for local economic revitalization.

However, the ESIA highlights that these developments coexist with:

- Persistent poverty and income inequality;
- High levels of unemployment, particularly among youth;
- Continued reliance on survival-based informal livelihoods, including waste-related activities.

#### **4.1.5 Historical and Cultural Significance**

Jamestown and the wider Ga Mashie area are of significant historical and cultural importance.

- Established in the 17th century around James Fort (British) and Ussher Fort (Dutch);
- One of the oldest continuously inhabited districts in Accra;
- Cultural hub of the Ga community, with strong traditional governance systems.

Key landmarks include:

- Jamestown Lighthouse;
- Colonial-era buildings (many in deteriorated condition);
- Cultural events such as the Chale Wote Street Art Festival, which attracts both local and international visitors.

This cultural context is important for RAP implementation, particularly in relation to:

- Community engagement;
- Respect for traditional authority structures;
- Social cohesion considerations.

#### **4.1.6 Infrastructure and Service Delivery**

Despite its central location, Ashiedu Keteke faces significant infrastructure challenges:

- Overcrowding and inadequate housing, particularly in informal settlements;
- Poor sanitation and waste management systems;
- Limited drainage infrastructure, contributing to flooding risks;
- Pressure on social services, including health and education.

The waste management challenges are particularly acute, with:

- High volumes of unmanaged waste;
- Informal waste aggregation and recycling systems;
- Environmental degradation, particularly around the Korle Lagoon.

#### **4.1.7 Implications for Resettlement Planning**

The project is located within a highly vulnerable urban system, characterized by:

- Dense population and limited space;
- High dependence on informal livelihoods;
- Weak infrastructure and service delivery;
- Significant socio-economic inequality.

Key implications for the RAP/LRP include:

- High sensitivity to displacement, even where impacts are primarily economic;
- Strong dependence on location-based livelihoods, particularly waste-related activities;
- Need for context-specific livelihood restoration strategies;
- Importance of engaging traditional authorities and local governance structures;
- Necessity for inclusive and pro-poor interventions, particularly for informal workers.

Given this context, the RAP/LRP adopts a livelihood-centered and socially inclusive approach, ensuring that affected persons are not only compensated but are supported to restore and improve their economic conditions in line with AfDB OS5.

## 4.2 Livelihood Systems

This section describes the dominant livelihood systems within the project area, based on findings from field consultations. It focuses particularly on informal economic activities linked to waste management, which constitute the primary source of income for Project Affected Persons (PAPs). The assessment confirms that livelihoods in the project area are predominantly informal, location-dependent, and highly sensitive to disruption, particularly those associated with waste picking, scrap dealing, and informal trading. These livelihood systems are embedded within a broader informal waste value chain, which plays a critical role in both income generation and urban waste management. Understanding these systems is essential for designing effective livelihood restoration and economic reintegration measures, in line with AfDB Operational Safeguard 5 (OS5).

### 4.2.1 Overview of the Informal Waste Economy

The project site and its surrounding areas as part of an informal waste economy, characterized by:

- Open access to waste streams;
- Informal collection, sorting, and recycling activities;
- Market-driven recovery and resale of recyclable materials;
- Limited regulation and absence of formal contracts.

This system supports a network of actors, including:

- Waste pickers (primary collectors);
- Scrap dealers (aggregators and traders);
- Intermediaries and buyers (linking to formal recycling markets);
- Informal traders providing ancillary services.

The informal waste economy provides daily income for a large number of individuals, many of whom lack alternative livelihood options.

### 4.2.2 Waste Picking

Waste picking is a primary livelihood activity for many PAPs within the project area.

According to the field observations:

- Waste pickers collect recyclable materials such as plastics, metals, and organic matter from mixed waste streams;
- Activities are conducted manually, often under hazardous conditions;
- Income is earned on a daily basis, depending on the quantity and type of materials recovered;
- Access to waste is largely unrestricted, forming the foundation of this livelihood.

#### **Key Characteristics:**

- Low entry barriers (no formal skills or capital required);
- High labor intensity;
- Income variability and vulnerability to external shocks.

#### **Dependency on the Project Site:**

The RAP confirms that many waste pickers depend directly on:

- The project site as a source of waste materials;
- Proximity to waste aggregation areas;

- Established informal networks for selling recovered materials.

Loss of access to the site and waste streams will therefore result in immediate income loss and economic displacement.

#### **4.2.3 Scrap Dealing and Recycling**

Scrap dealers and informal recyclers represent the second tier of the waste value chain, playing a critical role in aggregation, sorting, and commercialization of recyclable materials.

As identified:

- Scrap dealers purchase materials from waste pickers and sort them for resale;
- Activities are conducted within temporary or semi-permanent structures located on or near the project site;
- Business operations rely on:
  - Continuous supply of materials;
  - Proximity to waste sources;
  - Established buyer networks.

##### **Key Characteristics:**

- Slightly higher capital requirements than waste picking;
- Strong reliance on location and supply chain continuity;
- Integration into broader recycling markets.

##### **Resettlement Sensitivity:**

The scrap dealers are particularly vulnerable to:

- Loss of business location due to site clearance;
- Disruption of supply chains due to restricted access to waste;
- Breakdown of established trading networks.

#### **4.2.4 Informal Trading and Ancillary Activities**

In addition to waste-related livelihoods, a range of informal trading and support activities linked to the project site.

These include:

- Petty trading (food vendors, small goods);
- Service provision to waste workers;
- Transport and handling services.

These activities are typically:

- Location-dependent;
- Low-capital and survival-oriented;
- Dependent on foot traffic and proximity to economic hubs.

Such livelihoods are indirectly tied to the waste economy and are therefore also at risk from project-induced changes.

#### **4.2.5 Livelihood Characteristics and Vulnerabilities**

There are several cross-cutting characteristics of livelihoods in the project area:

- High dependence on daily income, with limited savings or financial buffers;
- Lack of formal employment contracts or social protection;
- Limited access to credit, training, or alternative livelihood opportunities;

- Exposure to occupational health and safety risks.

These characteristics contribute to a high level of vulnerability, particularly in the context of displacement.

#### **4.2.6 Gender Dimensions of Livelihoods**

The RAP indicates that:

- Women are actively involved in waste sorting, petty trading, and small-scale recycling;
- Women often earn lower incomes and have less access to capital;
- Female-headed households may be particularly vulnerable to income disruption.

This underscores the need for gender-responsive livelihood restoration measures.

#### **4.2.7 Implications for Resettlement and Livelihood Restoration**

Livelihoods in the project area are:

- Highly dependent on access to waste streams and site-based activities;
- Embedded within an interconnected informal value chain;
- Vulnerable to both direct and indirect project impacts.

Key implications for this RAP/LRP include:

- Livelihood restoration must go beyond compensation and focus on income restoration and diversification;
- There is a need to integrate informal actors into the formal waste management system, where feasible;
- Transitional support measures will be required to address short-term income loss;
- Special attention must be given to vulnerable groups, including women and youth.

This approach ensures that the RAP/LRP is aligned with AfDB OS5 requirements and responsive to the complex socio-economic realities.

### **4.3 Land Use and Tenure**

This section describes the prevailing land use patterns and tenure arrangements within the project footprint and its Area of Influence. It provides a critical basis for understanding who occupies the land, how it is used, and under what tenure conditions, which are essential for determining eligibility and entitlements under this RAP and Livelihood Restoration Plan (LRP). The land use within the project area is predominantly informal, unregulated, and economically driven, with limited evidence of formal land ownership or legally recognized tenure arrangements. This has significant implications for resettlement planning, particularly in relation to the treatment of non-title holders, who constitute the majority of Project Affected Persons (PAPs).

#### **4.3.1 Existing Land Use within the Project Footprint**

The project site, covering approximately 1.77 hectares, is currently utilized primarily for informal economic activities associated with waste management and recycling. The dominant land uses include:

- Waste picking and sorting activities;
- Scrap dealing and recycling operations;
- Temporary storage of recyclable materials;
- Informal trading and ancillary services;

- Open waste aggregation and disposal.

The site functions as an informal economic hub, supporting a network of actors engaged in the waste value chain. Land use is therefore productive rather than residential, although it may include temporary structures used for shelter and business purposes.

#### **4.3.2 Nature of Land Occupation**

The occupation of the site is largely:

- Informal and undocumented;
- Based on customary practice, tolerance, or opportunistic use;
- Not supported by formal lease agreements, titles, or permits.

Most site users:

- Do not possess legally recognized land rights;
- Operate under de facto access arrangements, often shaped by local norms and economic necessity;
- Have established long-term presence through continued use rather than legal entitlement.

This pattern is typical of urban informal settlements and economic zones in high-density areas such as Jamestown and Ashiedu Keteke.

#### **4.3.3 Tenure Classification of Affected Persons**

Based on the findings, affected persons can be broadly categorized as:

- Non-title holders (informal occupants):  
Waste pickers, scrap dealers, and informal traders without legal or customary rights to the land;
- Users of economic space:  
Individuals and groups whose livelihoods depend on access to the site rather than ownership of land;
- Operators of temporary structures:  
Persons who have constructed makeshift kiosks, sheds, or storage facilities for business purposes.

There is limited evidence of:

- Formal land ownership;
- Registered leasehold or customary tenure arrangements within the project footprint.

#### **4.3.4 Legal Status vs. Economic Reality**

Under Ghanaian law, as discussed in Chapter 3:

- Only persons with legally recognized interests in land are entitled to compensation for land acquisition;
- Informal occupants may be subject to eviction without compensation for land, although compensation for structures or discretionary support may be provided.

However, this RAP clearly demonstrates that:

- Informal occupants are economically dependent on the land;
- The site serves as a critical livelihood base, even in the absence of legal tenure;
- Displacement will result in significant income loss and increased vulnerability.

This creates a divergence between:

- Legal recognition (national law); and
- Socio-economic dependency.

#### **4.3.5 Implications for RAP Eligibility and Entitlements**

In accordance with AfDB Operational Safeguard 5 (OS5), eligibility for assistance is not limited to legal landowners.

Accordingly:

- All persons occupying or using the land prior to the cut-off date are considered Project Affected Persons (PAPs);
- Informal occupants are entitled to:
  - Compensation for structures and assets;
  - Livelihood restoration assistance;
  - Transitional support measures.

The RAP therefore adopts a functional definition of land use, recognizing:

- Economic use of land as a valid basis for eligibility;
- Informal occupation as a legitimate form of dependency requiring mitigation.

#### **4.3.6 Implications for Resettlement Planning**

The findings on land use and tenure highlight several critical considerations:

- The absence of formal tenure increases the risk of uncompensated displacement under national law;
- Livelihoods are strongly tied to physical access to land and waste resources;
- Displacement impacts are primarily economic rather than residential;
- There is a need for inclusive and equitable resettlement measures that go beyond legal entitlement.

Accordingly, this RAP/LRP:

- Recognizes all affected persons regardless of tenure status;
- Prioritizes livelihood restoration over land-based compensation;
- Ensures that informal actors are not excluded from project benefits.

### **4.4 Vulnerability Profile**

This section identifies and analyzes vulnerable groups within the project area, based on findings from stakeholder consultations. It highlights categories of Project Affected Persons (PAPs) who are likely to experience disproportionate impacts from economic displacement and who may have limited capacity to cope with livelihood disruption. The findings confirm that the project area, Jamestown and the wider Ashiedu Keteke Sub-Metropolitan Area, is characterized by high levels of poverty, informality, and social vulnerability, with many individuals dependent on daily income-generating activities. In accordance with AfDB Operational Safeguard 5 (OS5), vulnerable groups must receive targeted assistance to ensure that they are not further marginalized and are able to restore or improve their livelihoods.

#### **4.4.1 Definition of Vulnerability in the Project Context**

Within the context of this RAP/LRP, vulnerability refers to the reduced capacity of certain individuals or groups to anticipate, cope with, resist, and recover from project-induced impacts, particularly those related to economic displacement.

This RAP identifies vulnerability as arising from a combination of factors, including:

- Low and unstable income levels;
- Dependence on informal livelihoods;
- Limited access to assets, capital, and social protection;
- Exposure to environmental and occupational risks;
- Social marginalization and gender inequalities.

#### **4.4.2 Women**

Women constitute a significant proportion of informal workers within the project area, particularly in:

- Waste sorting and recycling activities;
- Petty trading and small-scale commerce;
- Ancillary services linked to the waste economy.

The RAP highlights that women often face:

- Lower income levels compared to male counterparts;
- Limited access to credit, land, and productive assets;
- Higher exposure to occupational health risks;
- Greater household responsibilities, including childcare.

Female-headed households are particularly vulnerable, as they often rely on single income streams and have limited coping mechanisms.

##### **Implications:**

- Higher risk of income loss following displacement;
- Need for gender-responsive livelihood restoration measures, including targeted training, access to finance, and inclusion in project opportunities.

#### **4.4.3 Youth**

Youth represent a large proportion of the workforce engaged in informal activities within the project area. The assessment indicates that many young people are involved in:

- Waste collection and recovery;
- Manual sorting and recycling;
- Informal trading and transport services.

Youth in the area are characterized by:

- High levels of unemployment and underemployment;
- Limited access to formal education or vocational training;
- Dependence on low-income, unstable livelihoods.

##### **Implications:**

- High sensitivity to disruption of income sources;
- Risk of increased unemployment and social instability if livelihoods are not restored;
- Opportunity for skills development and integration into formal waste management systems.

#### **4.4.4 Informal Workers (Waste Sector Actors)**

The majority of PAPs fall within the category of informal workers, including:

- Waste pickers;
- Scrap dealers;
- Informal traders.

The assessment identifies that these groups:

- Lack formal employment contracts and social protection;
- Depend on daily income for survival;
- Have limited savings or financial resilience;
- Operate under unsafe and unregulated conditions.

#### **Implications:**

- Immediate and severe impact from loss of access to the project site;
- Limited capacity to absorb income shocks;
- High dependence on effective livelihood restoration measures.

#### **4.4.5 Other Potentially Vulnerable Groups**

In addition to the above, the assessment and consultations indicate the presence of other potentially vulnerable groups, including:

- Elderly persons, with reduced physical capacity and limited alternative income opportunities;
- Persons with disabilities (PWDs), facing barriers to participation in economic activities;
- Individuals with chronic health conditions, particularly those exposed to environmental hazards;
- Households with high dependency ratios.

#### **4.4.6 Gender and Social Inclusion Considerations**

The RAP emphasizes that vulnerability is often intersectional, with overlapping factors such as gender, age, and income level compounding risks.

Key considerations include:

- Women and youth often occupy lower-value positions within the waste value chain;
- Informal workers are excluded from formal decision-making processes;
- Vulnerable groups may face barriers to accessing compensation and support programs.

### **4.5 Key Socio-Economic Risks**

This section presents a structured analysis of the key socio-economic risks associated with the project, based on findings from the Environmental and Social Impact Assessment (ESIA) and the baseline conditions described in preceding sections. The RAP confirms that the project area is characterized by high levels of informality, poverty, and dependence on location-specific economic activities, making affected populations particularly vulnerable to disruption. As such, even localized project impacts, particularly those related to economic displacement, have the potential to generate significant and disproportionate socio-economic consequences. The matrix below synthesizes key risks, their underlying drivers, and implications for resettlement planning, providing a clear basis for the design of mitigation measures under this RAP and Livelihood Restoration Plan (LRP).

**Table 2: Socio-Economic Risk Matrix**

| <b>Risk Category</b>                                   | <b>Description</b>                                                                   | <b>Key Drivers</b>                                                                                                                                                   | <b>Risk Implications</b>                                                                                                                                                                     | <b>RAP/LRP Response Measures</b>                                                                                                                                                              |
|--------------------------------------------------------|--------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>High Dependency on Site-Based Livelihoods</b>       | PAPs depend heavily on the project site and waste streams for income generation      | <ul style="list-style-type: none"> <li>- Access to waste materials</li> <li>- Proximity to trading networks</li> <li>- Location-based economic activities</li> </ul> | <ul style="list-style-type: none"> <li>- Immediate income loss upon site clearance</li> <li>- Limited ability to relocate livelihoods</li> <li>- High exposure to economic shocks</li> </ul> | <ul style="list-style-type: none"> <li>- Transitional income support</li> <li>- Rapid livelihood restoration programs</li> <li>- Relocation of economic activities where feasible</li> </ul>  |
| <b>Disruption of Informal Waste Value Chains</b>       | Project introduces structured waste systems, altering existing informal value chains | <ul style="list-style-type: none"> <li>- Source separation system</li> <li>- Controlled waste flows</li> <li>- Formalization of waste management</li> </ul>          | <ul style="list-style-type: none"> <li>- Reduced access to recyclable materials</li> <li>- Breakdown of supply chains</li> <li>- Risk of exclusion of informal actors</li> </ul>             | <ul style="list-style-type: none"> <li>- Integration of informal actors into formal system</li> <li>- Support for value chain adaptation</li> <li>- Cooperative/aggregation models</li> </ul> |
| <b>Limited Livelihood Alternatives</b>                 | PAPs have limited skills and few alternative income opportunities                    | <ul style="list-style-type: none"> <li>- Low education levels</li> <li>- Lack of vocational training</li> <li>- Informal sector dependence</li> </ul>                | <ul style="list-style-type: none"> <li>- Prolonged income loss</li> <li>- Increased poverty risk</li> <li>- Dependence on external support</li> </ul>                                        | <ul style="list-style-type: none"> <li>- Skills training and capacity building</li> <li>- Diversification of income sources</li> <li>- Enterprise support programs</li> </ul>                 |
| <b>Income Instability and Low Financial Resilience</b> | Livelihoods are based on daily earnings with minimal savings                         | <ul style="list-style-type: none"> <li>- Daily income model</li> <li>- Lack of financial inclusion</li> <li>- Absence of savings mechanisms</li> </ul>               | <ul style="list-style-type: none"> <li>- Immediate economic hardship</li> <li>- Risk of debt and food insecurity</li> <li>- Limited reinvestment capacity</li> </ul>                         | <ul style="list-style-type: none"> <li>- Financial literacy programs</li> <li>- Access to microfinance and grants</li> </ul>                                                                  |

| <b>Risk Category</b>                     | <b>Description</b>                                              | <b>Key Drivers</b>                                                                                                                                          | <b>Risk Implications</b>                                                                                                                                            | <b>RAP/LRP Response Measures</b>                                                                                                                                            |
|------------------------------------------|-----------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Vulnerability of Informal Workers</b> | Majority of PAPs are informal workers without social protection | <ul style="list-style-type: none"> <li>- Lack of contracts</li> <li>- Absence of safety nets</li> <li>- Precarious working conditions</li> </ul>            | <ul style="list-style-type: none"> <li>- Disproportionate impact on vulnerable groups</li> <li>- Risk of exclusion from project benefits</li> </ul>                 | <ul style="list-style-type: none"> <li>- Inclusive eligibility criteria (OS5)</li> <li>- Targeted livelihood programs</li> <li>- Social protection linkages</li> </ul>      |
| <b>Gender and Youth Risks</b>            | Women and youth face structural disadvantages in livelihoods    | <ul style="list-style-type: none"> <li>- Lower income levels (women)</li> <li>- High youth unemployment</li> <li>- Limited access to resources</li> </ul>   | <ul style="list-style-type: none"> <li>- Increased gender inequality</li> <li>- Youth disengagement and social risk</li> <li>- Reduced recovery capacity</li> </ul> | <ul style="list-style-type: none"> <li>- Gender-responsive interventions</li> <li>- Youth employment and training programs</li> <li>- Targeted financial support</li> </ul> |
| <b>Cumulative and Indirect Risks</b>     | Displacement effects extend beyond project site into wider AoI  | <ul style="list-style-type: none"> <li>- Displacement of activities</li> <li>- Competition for alternative spaces</li> <li>- Weak urban planning</li> </ul> | <ul style="list-style-type: none"> <li>- Conflict over resources</li> <li>- Increased poverty in surrounding areas</li> <li>- Environmental degradation</li> </ul>  | <ul style="list-style-type: none"> <li>- Area-wide stakeholder engagement</li> <li>- Spatial planning support</li> <li>- Conflict-sensitive GRM</li> </ul>                  |
| <b>High Overall Impact Sensitivity</b>   | Project area is highly sensitive to economic displacement       | <ul style="list-style-type: none"> <li>- Informality</li> <li>- Poverty</li> <li>- Location-dependent livelihoods</li> </ul>                                | <ul style="list-style-type: none"> <li>- Significant socio-economic disruption</li> <li>- High risk of impoverishment if unmanaged</li> </ul>                       | <ul style="list-style-type: none"> <li>- Comprehensive RAP/LRP implementation</li> <li>- Continuous monitoring and adaptive management</li> </ul>                           |

#### 4.5.1 Summary of Impact Sensitivity

The project area exhibits **high sensitivity to economic displacement**, due to:

- Strong dependence on site-specific and waste-based livelihoods;
- High levels of poverty and informality;
- Limited coping capacity among affected populations.

#### 4.5.2 Implications for RAP/LRP Design

The identified risks necessitate a robust, livelihood-centered, and inclusive RAP/LRP, with emphasis on:

- Immediate compensation and transitional support;

- Comprehensive livelihood restoration and diversification;
- Integration of informal actors into formal waste systems;
- Targeted interventions for vulnerable groups;
- Continuous monitoring, evaluation, and adaptive management.

## **5. STAKEHOLDER ENGAGEMENT AND DISCLOSURE**

This chapter presents the stakeholder engagement and disclosure processes relevant to the preparation and implementation of this Resettlement Action Plan (RAP) and Livelihood Restoration Plan (LRP). It adapts and builds upon the consultation processes already undertaken during the Environmental and Social Impact Assessment (ESIA), while focusing more specifically on issues of economic displacement, eligibility, compensation, livelihood restoration, relocation of informal operators, grievance redress, and disclosure of resettlement information. The stakeholder participation is a vital component of environmental and social assessment and that consultations were undertaken in accordance with Ghana's legal framework and international standards. For RAP purposes, stakeholder engagement is not treated as a one-off event, but as a continuous and inclusive process through which Project Affected Persons (PAPs) and other interested stakeholders are informed, consulted, and involved in decisions affecting their livelihoods and access to resources. In line with AfDB OS5, meaningful consultation is especially important where the project affects informal economic actors without formal land tenure, as is the case for scrap dealers, waste pickers, and other informal site users identified.

### **5.1 Objectives of Consultation in the RAP Process**

The consultation process under this RAP/LRP is intended to ensure that all resettlement-related issues are identified early, discussed transparently, and addressed in a fair and participatory manner. Building on the ESIA consultation process, the specific objectives of consultation in the RAP process are to:

- inform PAPs and other stakeholders about the project, its land requirements, and the resettlement implications of site clearance and restructuring of access to waste streams;
- identify all categories of PAPs, including informal scrap dealers, waste pickers, traders, and vulnerable persons;
- understand stakeholder concerns regarding displacement, compensation, relocation, livelihood restoration, and project integration opportunities;
- obtain stakeholder views on acceptable forms of compensation, transitional support, relocation assistance, and livelihood restoration options;
- ensure that women, youth, persons with disabilities, and other vulnerable groups are meaningfully included in the consultation process;
- disclose the RAP process, eligibility criteria, census procedures, and cut-off date requirements;
- strengthen transparency, ownership, and legitimacy of the RAP/LRP;
- establish the basis for an accessible and trusted grievance redress mechanism.

These objectives are consistent with the ESIA consultation framework, which emphasized public participation, disclosure, and continuous engagement throughout the project lifecycle.

### **5.2 Stakeholder Identification and Analysis**

Stakeholder identification for the RAP/LRP builds directly on the stakeholder mapping undertaken during the ESIA and the RAP assessment. The ESIA and the RAP assessment used a structured mapping process to identify persons, groups, and institutions that may be directly or indirectly affected by the project, have overlapping activities, or hold influence over project

implementation. For RAP purposes, these stakeholders are regrouped according to their relevance to displacement, compensation, livelihood restoration, and disclosure.

**Table 3: Key RAP Stakeholder Categories**

| <b>Stakeholder Category</b>                            | <b>Examples</b>                                                                                                       | <b>RAP Relevance</b>                                                                                                      |
|--------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|
| <b>Project Affected Persons (PAPs)</b>                 | Mortuary Road Scrap Dealers Association, informal waste pickers, recyclers, small traders, site users                 | Primary stakeholders affected by site clearance, relocation, loss of access to waste streams, and livelihood disruption   |
| <b>Vulnerable Groups</b>                               | Women, youth, elderly persons, PWDs, very low-income informal workers                                                 | Require targeted consultation and tailored support measures                                                               |
| <b>Local Communities and Representatives</b>           | Jamestown, Korle Bu, Korle Gonno, Mudor, Old Fadama/Konkoma, Agbogbloshie; assembly members; opinion leaders          | May be directly or indirectly affected by access changes, traffic, odour, safety, and livelihood restructuring            |
| <b>Traditional and Religious Authorities</b>           | Sempe Korle-Bu Mantse, Korle Wulormor, Gbese Mantse, religious leaders including ICGC and Abossey Okai Central Mosque | Important for local legitimacy, community entry, conflict prevention, and culturally appropriate disclosure               |
| <b>Government and Regulatory Institutions</b>          | AMA departments, EPA, GARCC,, Fisheries Commission, Ghana Police, GNFS, Social Welfare                                | Responsible for project oversight, safeguards compliance, compensation support, local coordination, and social protection |
| <b>Formal and Informal Service Providers</b>           | Jekora Ventures, Zoomlion/IRECOP, ESPA, ISPs, aboboyaa operators                                                      | Relevant to integration of informal workers, waste flow restructuring, and livelihood restoration opportunities           |
| <b>Sensitive Receptors / Neighbouring Institutions</b> | Korle Bu Teaching Hospital, Bukom Boxing Arena, Triple C Ghana Ltd, schools, churches, mosques                        | Concerned with health, safety, nuisance, security, and neighbouring project impacts                                       |
| <b>Research / Development Partners / NGOs</b>          | GIZ Ghana, CSIR-WRI, Accra School of Hygiene, Ghana Wildlife Society                                                  | Technical input, training, monitoring support, and social inclusion insights                                              |

### **5.2.1 RAP Stakeholder Prioritization**

For RAP purposes, the highest-priority stakeholders are:

1. Directly affected PAPs, especially scrap dealers on the site;
2. Economically affected waste value chain actors, including informal waste pickers and collectors;

3. Vulnerable PAPs, particularly women and youth;
4. AMA and relevant institutions responsible for implementation, valuation, financing, and safeguards oversight.

This prioritization is justified by the assessment, which specifically identified the existing project site as occupied by the Mortuary Road Scrap Dealers Association and recognized the risks of displacement and livelihood loss among informal operators.

### **5.3 Consultation Process and Methods**

The RAP consultation process adopts the same participatory logic used in the ESIA, but with a sharper focus on resettlement and livelihood restoration. The consultations were conducted using culturally sensitive methods and in accessible languages, including English, Twi, and Ga, and that engagements were organized at times and places convenient to participants. This approach remains applicable to the RAP.

#### **5.3.1 Consultation Methods Used**

The following methods were used during the assessment:

- Community forums, to discuss project impacts, resettlement implications, and community concerns in an open setting;
- Key informant interviews, with institutions, traditional leaders, assembly representatives, and technical agencies;
- One-on-one interviews, particularly with PAPs and vulnerable persons whose concerns may require confidentiality or tailored support;
- Focus group discussions, including separate engagement with women, food vendors, market operators, and informal service providers;
- Validation workshops, to present findings, confirm concerns, and discuss next steps.

#### **5.3.2 RAP-Specific Consultation Themes**

The RAP/LRP consultation process focuses specifically on:

- identity and categories of PAPs;
- nature and scale of economic and any physical displacement;
- compensation preferences and valuation concerns;
- alternative locations or business continuity options;
- livelihood restoration and integration into formal waste management systems;
- transitional support needs;
- vulnerability and inclusion concerns;
- grievance procedures and appeals;
- disclosure of RAP information and cut-off date.

### **5.4 Summary of Consultations Conducted**

A total of 5 meetings with governmental and non-governmental institutions and 5 forums/meetings with project affected persons (PAPs) were organized during the study period.

For RAP purposes, these consultations are adapted below to highlight the concerns most relevant to displacement, compensation, livelihood restoration, and project inclusion.

#### 5.4.1 Locations, Dates, and Participants

According to the assessment, consultations were undertaken between February, and March 2025, and in April and May 2026 with a stakeholder validation meeting held on the 7<sup>th</sup> May 2026 at the Naa Dedei Hall, AMA premises.

Key consultation locations and stakeholder groupings included:

- AMA and institutional consultations with AMA departments, GIZ, KBTH, GNFS, CSIR, and other agencies;
- Focused engagement with affected informal operators, including the Mortuary Road Scrap Dealers;
- Engagement with traditional and religious stakeholders, including Sempe Korle-Bu Mantse, ICGC leadership, and Abossey Okai Central Mosque;

From the consultation record, the following RAP-relevant concerns were raised:

**Table 4: Key Concerns Raised Relevant to the RAP**

| Issue                                                                   | Stakeholders Raising It                                                                  | RAP Significance                                     |
|-------------------------------------------------------------------------|------------------------------------------------------------------------------------------|------------------------------------------------------|
| Displacement and loss of livelihoods of waste pickers and scrap dealers | Waste Pickers Association, WIEDO, Mortuary Road Scrap Dealers, AMA-related consultations | Confirms need for RAP/LRP and integration strategy   |
| Need for clear integration of informal workers into new system          | Waste pickers, ISPs, ESPA, communities                                                   | Links directly to livelihood restoration design      |
| Need for fair remuneration / compensation                               | Informal operators and associations                                                      | Supports entitlement and compensation framework      |
| Request for clear guidelines on relocation / integration                | Waste picker groups, scrap dealers                                                       | Supports RAP implementation planning                 |
| Need for ongoing awareness and consultation                             | Community groups, AMA, School of Hygiene, others                                         | Supports continuous disclosure and engagement        |
| Labour conditions and fair treatment of informal workers                | ESPA and other stakeholders                                                              | Supports worker integration and restoration approach |
| Need for a dedicated resettlement strategy                              | AMA / sub-metros                                                                         | Confirms separation of RAP as a focused instrument   |

The stakeholders specifically raised concerns over displacement and livelihood loss, and that the project team indicated that a resettlement strategy would be developed to address relocation and safeguards requirements.



**Photo 2: Photos of Validation Workshop**

#### **5.4.2 Responses and Commitments Emerging from Consultations**

The assessment records several commitments that are directly relevant to this RAP/LRP. These include commitments to:

- identify synergies with existing waste pickers and integrate their activities into the project;
- strengthen further stakeholder engagement during project implementation;
- develop a resettlement strategy to ensure smooth relocation of illegal settlers/site occupants;
- maintain grievance and stakeholder communication arrangements;
- support inclusive hiring and local participation.

These commitments are now translated in this RAP/LRP into more specific and enforceable actions relating to PAP identification, entitlements, livelihood restoration, and grievance handling.

## 5.5 Disclosure of Information and Cut-off Date

Disclosure is a central requirement of both Ghanaian environmental assessment practice and AfDB OS5. The assessment already established a foundation for information sharing through public consultations, validation workshops, and planned future disclosures. Under the RAP, disclosure becomes more specific and targeted to ensure that PAPs understand their rights, obligations, and the procedures governing compensation and livelihood restoration.

### 5.5.1 RAP Disclosure Requirements

Under this RAP/LRP, the following information shall be disclosed to PAPs and relevant stakeholders in accessible formats and appropriate languages:

- project description and the reason land clearance / access restriction is required;
- categories of PAPs and eligibility criteria;
- census and asset inventory process;
- valuation and compensation principles;
- livelihood restoration options;
- grievance redress procedures;
- implementation schedule and contact points.

Disclosure shall be undertaken through:

- community meetings and small group forums;
- direct engagement with PAP associations, including scrap dealer groups;
- notices through local leaders, assembly members, and sub-metro structures;
- simplified summaries in English, Twi, and Ga;
- institutional circulation to AMA, EPA, and relevant local actors.

### 5.5.2 Cut-off Date

In line with AfDB OS5 and the RAP methodology, a cut-off date will be established after the census and asset inventory and publicly disclosed to all PAPs and relevant stakeholders. The purpose of the cut-off date is to:

- define eligibility for compensation and assistance;
- prevent opportunistic settlement or claims after the census;
- ensure a transparent and verifiable PAP register.

The cut-off date was disclosed through community notice, PAP meetings, association-level communication, and institutional channels. Any persons occupying the site after the cut-off date will not be eligible for compensation or RAP assistance, unless otherwise determined through a justified grievance review. Officially, 30 April 2026 represents the date of completion of the draft RAP report, **while 8 May 2026** represents the officially disclosed and adopted cut-off date following stakeholder validation and confirmation of the PAP database.

## 5.6 Ongoing Engagement during RAP Implementation

Stakeholder engagement will continue throughout RAP/LRP implementation. The ESIA envisaged stakeholder engagement as an ongoing process through pre-mobilization, construction, operation, and decommissioning. For RAP purposes, this continuous engagement will focus on ensuring that PAPs remain informed, consulted, and supported before, during, and after displacement. Please note that all compensation payments and relocation activities will be completed prior to the commencement of works.

**Table 5: Key Stages of Ongoing RAP Engagement**

| Implementation Stage                       | Purpose of Engagement                                                                                                     | Main Stakeholders                               |
|--------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|
| Pre-implementation / pre-clearance         | Confirm PAP list, disclose eligibility and entitlements, announce cut-off date, validate compensation and support options | PAPs, AMA, local leaders, associations          |
| Compensation and/ or relocation planning   | Discuss compensation packages, relocation options, business continuity support, and special assistance                    | PAPs, AMA, valuation / social teams             |
| Livelihood restoration rollout             | Co-design livelihood support programs, training, integration pathways, and transitional support                           | PAPs, ISPs, FSPs, AMA, service providers        |
| Construction phase                         | Monitor emerging grievances, ensure agreed safeguards are applied, maintain communication with affected communities       | PAPs, neighbouring communities, contractor, AMA |
| Post-displacement / restoration monitoring | Track livelihood outcomes, resolve outstanding issues, adjust support if needed                                           | PAPs, PCU, AMA, monitors                        |

### 5.6.1 Core Principles for Ongoing RAP Engagement

Ongoing engagement under the RAP/LRP shall be guided by the following principles:

- inclusiveness, ensuring participation of all PAP categories;
- transparency, particularly on compensation and eligibility;
- cultural appropriateness, using local language and trusted community channels;
- timeliness, ensuring consultation occurs before decisions are finalized;
- accessibility, especially for women, PWDs, and marginalized informal workers;
- responsiveness, ensuring concerns are documented and acted upon.

## 6. GRIEVANCE REDRESS MECHANISM (GRM)

This chapter presents the Grievance Redress Mechanism (GRM) established for the Resettlement Action Plan (RAP) and Livelihood Restoration Plan (LRP). It builds on the GRM framework developed under the ESIA and adapts it specifically to address resettlement-related grievances, including compensation, economic displacement, livelihood restoration, and access to project benefits. The ESIA confirms that the GRM is grounded in Ghana's legal framework, including constitutional provisions on property rights and grievance redress, and aligned with international standards such as IFC Performance Standards, emphasizing accessibility, transparency, and non-retaliation. In line with AfDB Operational Safeguard 5 (OS5), the GRM is designed to:

- provide accessible and culturally appropriate channels for PAPs to raise concerns;
- ensure timely, fair, and transparent resolution of grievances;
- minimize reliance on judicial processes;
- support continuous stakeholder engagement and trust-building.

### 6.1 Objectives and Principles of the GRM

The GRM serves as a critical safeguard tool to manage risks associated with resettlement and livelihood disruption, particularly in a context where PAPs are largely informal actors without formal legal protections.

#### Objectives

The objectives of the GRM are to:

- provide PAPs and stakeholders with accessible channels to lodge complaints;
- ensure grievances are addressed promptly and fairly;
- resolve disputes related to compensation, relocation, and livelihood restoration;
- prevent escalation of conflicts;
- strengthen accountability and transparency in RAP implementation.

#### Guiding Principles

The guiding principles include the following and is described in Table 6: Accessibility, Transparency, Fairness, Confidentiality, Non-retaliation, Timeliness and Cultural appropriateness.

**Table 6: Description of Guiding principles**

| Principle                | Description                                  |
|--------------------------|----------------------------------------------|
| Accessibility            | Open to all PAPs, including informal workers |
| Transparency             | Clear procedures and timelines               |
| Fairness                 | Equitable treatment of all complaints        |
| Confidentiality          | Protection of sensitive information          |
| Non-retaliation          | No penalties for complainants                |
| Timeliness               | Defined resolution timelines                 |
| Cultural appropriateness | Use of local languages and structures        |

## 6.2 GRM Structure and Levels

The Grievance Redress Mechanism (GRM) for this RAP/LRP adopts a multi-tiered, decentralized but coordinated structure, leveraging existing governance and administrative systems in Ghana, particularly those of the Accra Metropolitan Assembly (AMA) and the Greater Accra Regional Coordinating Council (GARCC). This structure is designed to ensure that grievances are:

- addressed at the lowest appropriate level to promote efficiency and community ownership;
- escalated progressively where resolution is not achieved;
- managed in a transparent, consistent, and accountable manner across all levels.

The ESIA confirms that grievance resolution in Ghana operates through a community-to-national escalation system, incorporating community committees, local authorities, and formal administrative structures. This RAP builds on that system and strengthens it to address resettlement-specific issues, including compensation disputes, PAP eligibility, livelihood restoration, and access to project benefits.

### 6.2.1 GRM Levels and Functional Roles

The GRM is structured across four levels, as summarized below.

**Table 7: GRM Levels**

| Level                             | Structure                                                                      | Role                                                                                |
|-----------------------------------|--------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|
| <b>Community Level</b>            | Community Grievance Committees (CGSCs), Contractors, PAP Associations          | First point of complaint; immediate intake, registration, and attempt at resolution |
| <b>Sub-Metro / District Level</b> | AMA Departments (PRCC, Social Welfare, Environmental Health, Waste Management) | Screening, verification, and formal resolution of grievances                        |
| <b>Regional Level</b>             | GARCC                                                                          | Escalation, coordination, oversight, and resolution of complex/unresolved cases     |
| <b>National / Judicial Level</b>  | Courts, Independent Arbitration                                                | Final recourse for unresolved disputes                                              |

### 6.2.2 Functional Description of GRM Levels

#### (i) Community Level -First Line of Resolution

At the community level, grievances are received and addressed by:

- Community Grievance and Surveillance Committees (CGSCs);
- Contractors and site-level personnel;
- PAP associations (e.g., scrap dealers, informal workers).

#### **Key Functions:**

- Receive complaints directly from PAPs;
- Record grievances and provide immediate acknowledgment;
- Attempt informal and rapid resolution through dialogue;

- Refer unresolved cases to AMA structures.

**RAP Relevance:**

This level is particularly critical for:

- resolving minor disputes quickly;
- maintaining trust with PAPs;

**(ii) Sub-Metro / District Level – Core Resolution Level**

At this level, the AMA-through its departments and the Public Relations and Complaints Committee (PRCC)-plays the central role.

**Key Functions:**

- Screen and categorize grievances (e.g., compensation, eligibility, livelihood);
- Conduct verification and investigation;
- Engage PAPs in structured resolution processes;
- Coordinate with valuation, social, and technical teams;
- Maintain official grievance records and database.

**RAP Relevance:**

This is the primary decision-making level for:

- compensation-related grievances;
- PAP identification disputes;
- livelihood restoration concerns.

**(iii) Regional Level - Oversight and Escalation**

The GARCC provides a higher-level review and coordination function.

**Key Functions:**

- Handle grievances unresolved at AMA level;
- Coordinate across MMDAs where issues are cross-jurisdictional;
- Provide oversight and ensure consistency in grievance handling;
- Support capacity building and system strengthening.

**RAP Relevance:**

This level is essential for:

- resolving complex or high-stakes disputes;
- ensuring fairness and neutrality;
- addressing systemic or recurring issues.

**(iv) National / Judicial Level – Final Recourse**

Where grievances cannot be resolved administratively:

- PAPs may seek resolution through independent arbitration or the judicial system.

**Key Functions:**

- Provide legally binding resolution;
- Ensure protection of rights under Ghanaian law;
- Serve as final appeal mechanism.

**RAP Principle:**

The GRM does not restrict access to judicial remedies, consistent with international standards.

### 6.2.3 Institutional Responsibilities

**Table 8: Institutional Responsibilities**

| Institution                                                | Responsibility                                                                                                          |
|------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|
| <b>Accra Metropolitan Assembly (AMA)</b>                   | Overall coordination of the GRM; ensures RAP compliance; manages grievance database; leads resolution at district level |
| <b>Greater Accra Regional Coordinating Council (GARCC)</b> | Oversight, escalation handling, coordination across districts, monitoring GRM effectiveness                             |
| <b>Contractors</b>                                         | Maintain grievance logs at site level; support intake and initial response; report grievances to AMA                    |
| <b>Community Grievance Committees (CGSCs)</b>              | Community-level grievance intake and resolution; facilitate dialogue; escalate unresolved cases                         |
| <b>Social Welfare &amp; PRCC (AMA)</b>                     | Case handling, documentation, mediation, and coordination of grievance resolution                                       |
| <b>Project Coordination Unit (PCU)</b>                     | Ensure GRM integration into RAP implementation; reporting to financiers; performance monitoring                         |

### 6.2.4 GRM Flow and Escalation Pathway

**Table 9: Grievance Escalation Pathway**

| Stage   | Action                     | Responsible Entity      | Outcome                                  |
|---------|----------------------------|-------------------------|------------------------------------------|
| Stage 1 | Complaint submission       | PAP → CGSC / Contractor | Registration and acknowledgment          |
| Stage 2 | Initial resolution attempt | CGSC / Contractor       | Resolved or escalated                    |
| Stage 3 | Formal assessment          | AMA / PRCC              | Investigation and resolution             |
| Stage 4 | Escalation                 | GARCC                   | Review and final administrative decision |
| Stage 5 | Appeal                     | Arbitration / Court     | Legal resolution                         |

### 6.2.5 Key Features of the GRM Structure

The GRM structure is designed to ensure:

- **Accessibility:** PAPs can submit complaints at community level;
- **Efficiency:** Most grievances resolved at local or AMA level;
- **Accountability:** Clear roles and documentation at each level;
- **Transparency:** Defined escalation pathway;
- **Inclusiveness:** Informal and vulnerable groups are fully covered;
- **Flexibility:** Ability to adapt to different types of grievances.

### 6.2.6 Implications for RAP Implementation

This structured, multi-level GRM ensures that:

- resettlement-related grievances are addressed promptly and fairly;
- PAPs have confidence in the process;
- disputes do not escalate into conflict or project delays;
- RAP implementation remains socially sustainable and compliant with AfDB OS5.

## 6.3 Grievance Uptake and Registration

An effective grievance uptake and registration system is essential to ensure that all Project Affected Persons (PAPs) and stakeholders have accessible, reliable, and transparent channels to raise concerns. The grievances can be submitted through multiple channels, including in-person, phone, and community structures, to ensure inclusivity and responsiveness. This RAP builds on that system and strengthens it to ensure that informal workers, vulnerable groups, and economically displaced persons can easily access the GRM without barriers. The grievance uptake system is designed to:

- accommodate both formal and informal complaints;
- allow anonymous submissions where necessary;
- ensure that all grievances are systematically recorded and tracked;
- provide PAPs with confidence that their concerns will be addressed fairly.

### Grievance Uptake Channels

To ensure accessibility for all stakeholders, including illiterate and vulnerable groups, the GRM provides multiple entry points for submitting grievances.

**Table 10: Grievance Uptake Channels**

| Channel                         | Description                                                                                 |
|---------------------------------|---------------------------------------------------------------------------------------------|
| <b>In-person</b>                | Submission at project offices, AMA offices, CGSCs, community leaders, or contractor offices |
| <b>Phone / WhatsApp</b>         | Dedicated hotline for calls, SMS, and WhatsApp messages                                     |
| <b>Suggestion Boxes</b>         | Secure boxes placed at strategic community locations                                        |
| <b>Email / Online Platforms</b> | Digital submission via email or project/AMA platforms                                       |
| <b>Through Associations</b>     | Submission via scrap dealer groups, informal service providers (ISPs), or community groups  |

### Accessibility and Inclusiveness Measures

To ensure no stakeholder is excluded:

- grievance submission will be available in **local languages (Twi, Ga, English, Dagani)**;
- community leaders and PAP associations will support **illiterate complainants**;
- vulnerable groups (women, PWDs, youth) will be given priority access and assistance;

- anonymous complaints will be accepted and investigated to the extent possible;
- no fees or charges will be required to lodge complaints.

### Grievance Intake Procedures

Upon receipt of a grievance:

1. The complaint is acknowledged immediately (verbally or in writing);
2. A designated officer (e.g., PRCC or Communication Specialist) records the complaint;
3. A unique reference number is assigned;
4. The complaint is entered into the central grievance database;
5. The complainant is informed of:
  - next steps;
  - expected timelines;
  - responsible entity handling the grievance.

All project staff, contractors, and community representatives are required to forward any grievance received to the designated GRM focal point for formal registration.

### Grievance Registration System

All grievances will be recorded in a **centralized grievance register/database**, managed by AMA, to ensure consistency, traceability, and reporting.

**Table 11: Grievance Register Structure**

| Field               | Description                                  |
|---------------------|----------------------------------------------|
| Reference Number    | Unique identifier assigned to each grievance |
| Date Received       | Date of submission                           |
| Complainant Details | Name and contact (if not anonymous)          |
| Location            | Origin of complaint (community/site)         |
| Nature of Complaint | Type/category of grievance                   |
| Assigned Entity     | Responsible institution or officer           |
| Status              | Open / Under Review / Resolved / Closed      |

### Additional Data Fields (Enhanced Tracking)

To strengthen monitoring and reporting, the register will also capture following in Table 12:

**Table 12: Additional Data Fields**

| Additional Field       | Purpose                                    |
|------------------------|--------------------------------------------|
| Category of grievance  | Compensation, livelihood, employment, etc. |
| Priority level         | High / Medium / Low                        |
| Date of acknowledgment | Track responsiveness                       |
| Resolution timeline    | Track efficiency                           |
| Outcome                | Agreed resolution                          |
| Closure date           | Final status                               |
| Satisfaction level     | PAP feedback                               |

### Categorization of Grievances

Consistent with the ESIA, grievances will be categorized to support prioritization and response.

**Table 13: Grievance Categories**

| Category | Description                                           |
|----------|-------------------------------------------------------|
| A0       | General inquiries not directly related to the project |
| A1       | Questions or requests for clarification               |
| A2       | Requests or petitions                                 |
| A3       | Complaints (including RAP-related issues)             |

### **Confidentiality and Data Protection**

The GRM ensures that:

- personal data of complainants is protected and securely stored;
- sensitive grievances (especially GBV/SEA/SH) are handled through confidential channels;
- access to grievance records is restricted to authorized personnel;
- information is disclosed only on a need-to-know basis.

### **Link to RAP Implementation**

The grievance uptake and registration system is directly linked to RAP implementation by:

- capturing complaints related to:
  - PAP eligibility
  - livelihood restoration
  - relocation and access
- providing real-time feedback to improve RAP delivery;
- enabling early identification of systemic issues;
- supporting monitoring and reporting to AMA, GARCC, and financiers.

### **Key Strengths of the GRM Intake System**

The system ensures:

- multiple access points for all stakeholders;
- traceability through unique IDs and database tracking;
- inclusiveness, especially for informal and vulnerable PAPs;
- transparency and accountability in grievance handling;
- alignment with AfDB OS5 and ESIA commitments.

## **6.4 Grievance Assessment and Resolution Process**

The grievance assessment and resolution process defines how complaints are reviewed, prioritized, investigated, and resolved in a timely and transparent manner. It operationalizes the GRM structure described in Section 6.2 and ensures that all grievances, particularly those related to resettlement, compensation, and livelihood restoration, are addressed in accordance with AfDB OS5 principles.

The ESIA establishes a structured grievance resolution procedure involving registration, screening, examination, response, and closure, with defined timelines and escalation pathways.

This RAP adapts and strengthens that procedure to ensure responsiveness to PAP-specific concerns, including economic displacement and vulnerability.

### Overview of the Grievance Resolution Process

The GRM follows a seven-step process, from intake to closure, with built-in escalation and review mechanisms.

**Table 14: Grievance Resolution Steps**

| Step   | Process Stage                | Description                                  | Responsible Entity        |
|--------|------------------------------|----------------------------------------------|---------------------------|
| Step 1 | Reception & Registration     | Receive, record, and assign reference number | CGSCs / Contractors / AMA |
| Step 2 | Screening & Classification   | Categorize and assign priority               | AMA / PRCC                |
| Step 3 | Assessment & Investigation   | Verify facts and determine cause             | AMA / Technical Teams     |
| Step 4 | Response Development         | Propose resolution options                   | AMA / PCU                 |
| Step 5 | Implementation of Resolution | Execute agreed corrective action             | AMA / Contractor          |
| Step 6 | Review (if unresolved)       | Reassess or escalate grievance               | GARCC                     |
| Step 7 | Closure                      | Confirm resolution and close case            | AMA / Complainant         |

### Screening, Classification, and Prioritization

Once a grievance is registered, it is screened and classified to determine its nature, urgency, and appropriate response pathway.

**Table 14: Grievance Priority Classification**

| Priority Level | Description                                         | Examples                                                 | Response Time     |
|----------------|-----------------------------------------------------|----------------------------------------------------------|-------------------|
| <b>High</b>    | Urgent, high-risk or rights-related issues          | Compensation disputes, group complaints, livelihood loss | ≤ 10 working days |
| <b>Medium</b>  | Issues affecting individuals or project performance | Individual complaints, delays in payments                | ≤ 14 working days |
| <b>Low</b>     | Minor concerns or information gaps                  | Requests for clarification                               | ≤ 28 days         |

### Key Considerations

- High-priority cases include RAP-related grievances such as:
  - compensation disputes
  - PAP eligibility issues
  - livelihood loss complaints
- Priority determines response speed and level of attention

### *Assessment and Investigation*

Following classification, grievances undergo detailed assessment to determine their validity, root causes, and appropriate corrective actions.

#### *Assessment Activities*

- verification of PAP status and eligibility;
- site visits and physical inspection of assets (if applicable);
- consultation with complainant and affected parties;
- review of RAP records (census, asset inventory, compensation data);
- coordination with relevant technical units (valuation, social, environmental).

#### *Outcome of Assessment*

The assessment will determine:

- whether the grievance is **valid or not**;
- the **extent of impact**;
- the **appropriate resolution option**;
- whether escalation is required.

### **Resolution Development and Implementation**

Once the grievance is validated, a **resolution plan** is developed in consultation with the complainant.

**Table 15: Types of Resolution Measures**

| Type of Issue          | Resolution Approach                               |
|------------------------|---------------------------------------------------|
| Compensation disputes  | Revaluation, clarification, adjustment            |
| PAP eligibility        | Verification and inclusion/exclusion review       |
| Livelihood restoration | Additional support, program adjustment            |
| Access issues          | Restoration of access or alternative arrangements |
| Information gaps       | Clarification and improved communication          |

**Table 16: Implementation Timeline Matrix**

| Action                | Timeline       |
|-----------------------|----------------|
| Acknowledge grievance | Within 5 days  |
| Assign responsibility | Within 7 days  |
| Develop response      | Within 14 days |
| Implement resolution  | Within 1 month |

### **Grievance Closure**

A grievance is considered resolved only when the complainant is satisfied or when all reasonable efforts have been made to resolve the issue.

#### *Closure Process*

- communicate outcome to complainant (written/verbal);
- obtain confirmation of satisfaction (signature or verbal consent);
- record resolution in grievance database;
- update status to “closed”.

#### *If Not Resolved*

- grievance proceeds to review or appeals stage;
- additional investigation may be conducted;
- mediation may be initiated.

### **Escalation and Review Mechanism**

Where grievances cannot be resolved at initial levels, they are escalated to higher authorities.

**Table 17: Escalation Pathway**

| Level               | Action                         |
|---------------------|--------------------------------|
| Community → AMA     | Referral for formal resolution |
| AMA → GARCC         | Escalation of complex cases    |
| GARCC → Arbitration | Independent mediation          |
| Arbitration → Court | Legal resolution               |

### **Time-Bound Resolution Framework**

Timeliness is critical to maintaining trust and preventing escalation.

**Table 18: Timeframe Summary**

| Stage         | Timeline   |
|---------------|------------|
| Registration  | ≤ 5 days   |
| Screening     | ≤ 7 days   |
| Investigation | ≤ 14 days  |
| Resolution    | ≤ 30 days  |
| Full closure  | ≤ 2 months |

### **Key Features of the Resolution Process**

The grievance resolution process ensures:

- structured and predictable workflow;
- clear accountability at each stage;
- timely resolution of complaints;
- escalation pathways for unresolved issues;
- alignment with AfDB OS5 and ESIA commitments.

## Link to RAP Implementation

The grievance resolution process is critical to RAP success because it:

- manages disputes related to compensation and livelihoods;
- ensures fairness in PAP treatment;
- provides feedback to improve RAP implementation;
- prevents conflict and project delays.

## 6.5 Appeals Process

The appeals process provides an additional safeguard to ensure that grievances which are not resolved at the initial stages of the GRM are reviewed fairly, transparently, and independently. It reinforces the credibility of the GRM by guaranteeing that Project Affected Persons (PAPs) have access to higher levels of review and external dispute resolution mechanisms. The unresolved grievances may be escalated to higher administrative levels and, where necessary, to independent arbitration or the judicial system. This RAP adopts and strengthens that approach to ensure compliance with AfDB Operational Safeguard 5 (OS5), which requires that PAPs have access to effective and accessible grievance and appeals mechanisms without restricting legal rights.

### Purpose of the Appeals Process

The appeals process is designed to:

- provide PAPs with an opportunity to challenge decisions made during grievance resolution;
- ensure fairness, impartiality, and accountability in decision-making;
- address complex or unresolved disputes, particularly those related to compensation and livelihood restoration;
- minimize escalation into conflict or litigation by offering structured review mechanisms.

### Triggers for Appeal

A grievance may proceed to the appeals stage under the following circumstances:

- the complainant is not satisfied with the proposed resolution;
- the grievance is not resolved within the stipulated timeframe;
- new evidence or information emerges requiring reconsideration;
- the issue involves complex or high-stakes matters, such as compensation valuation or PAP eligibility.

### Appeals Structure and Levels

The appeals process follows a structured escalation pathway, building on the GRM levels described earlier.

**Table 19: Appeals Structure**

| Level | Structure | Role in Appeals |
|-------|-----------|-----------------|
|-------|-----------|-----------------|

|         |                             |                                                    |
|---------|-----------------------------|----------------------------------------------------|
| Level 1 | AMA / PRCC Review Committee | Re-examination of grievance and initial resolution |
| Level 2 | GARCC Review Committee      | Independent review and decision on escalated cases |
| Level 3 | Independent Arbitration     | Neutral third-party mediation                      |
| Level 4 | Judicial System (Courts)    | Final legal determination                          |

## Appeals Procedure

### *Step-by-Step Process*

1. **Submission of Appeal**
  - The complainant formally submits a request for review;
  - May be submitted through the same channels used for grievances.
2. **Registration of Appeal**
  - Appeal is recorded in the grievance database;
  - Assigned a new or linked reference number.
3. **Review and Reassessment**
  - Case is re-examined by AMA or escalated to GARCC;
  - Additional consultations and verification may be conducted.
4. **Decision and Communication**
  - A formal decision is made and communicated to the complainant;
  - Reasons for the decision are clearly explained.
5. **Escalation (if required)**
  - If unresolved, the case proceeds to arbitration or court.

## Appeals Timeline

**Table 20: Appeals Timeline**

| Action                    | Timeline                           |
|---------------------------|------------------------------------|
| Submission of appeal      | Within 14 days of initial decision |
| Review and reassessment   | Within 14–30 days                  |
| Communication of decision | Within 30 days                     |
| Escalation to arbitration | Within 1 month                     |
| Judicial process          | As per legal procedures            |

## Key Principles of the Appeals Process

The appeals mechanism is guided by the following principles:

- **Impartiality:** Decisions are made objectively and independently;
- **Transparency:** Clear procedures and documented decisions;
- **Accessibility:** No barriers to submitting appeals;
- **Timeliness:** Defined timelines for review and response;
- **Right to Legal Recourse:** PAPs retain full access to courts at any stage.

### Special Considerations for RAP-Related Appeals

Given the nature of resettlement impacts, particular attention will be given to appeals related to:

- compensation valuation and adequacy;
- PAP eligibility and inclusion/exclusion;
- livelihood restoration support and outcomes;
- treatment of vulnerable groups;
- access to project benefits and opportunities.

These cases will be treated with **high priority**, given their direct impact on PAP well-being and project credibility.

### Link to GRM and RAP Implementation

The appeals process complements the GRM by:

- ensuring that unresolved grievances do not remain unaddressed;
- strengthening trust in the grievance system;
- providing a structured mechanism for resolving disputes;
- reducing the risk of litigation and project delays.

### Documentation and Record-Keeping

All appeals will be:

- recorded in the grievance database;
- linked to the original grievance record;
- documented with decisions, actions, and outcomes;
- included in periodic GRM monitoring and reporting.

### Conclusion

The appeals process ensures that the GRM is robust, credible, and aligned with both national systems and AfDB OS5 requirements. It guarantees that PAPs have multiple avenues for redress, thereby promoting fairness, transparency, and accountability in RAP implementation.

## 6.6 GBV/SEA/SH Sensitive Case Handling

Gender-Based Violence (GBV), including Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH), represents a critical social risk in projects involving labor influx, informal economies, and vulnerable populations. Given the socio-economic profile of the project area—characterized by informality, poverty, and vulnerable groups—the potential for GBV/SEA/SH risks must be proactively addressed. The GBV/SEA/SH cases require specialized, confidential, and survivor-centered handling mechanisms, separate from the general grievance process. Accordingly, this RAP establishes a dedicated protocol that prioritizes survivor safety, confidentiality, and access to professional support services, in line with AfDB OS5 and international good practice.

### 6.6.1 Objectives and Guiding Principles of GBV/SEA/SH Handling Mechanism

The *objectives* are to:

- provide safe, confidential, and accessible channels for reporting GBV/SEA/SH incidents;
- ensure immediate referral to appropriate support services;
- protect survivors from stigma, retaliation, and further harm;
- ensure that complaints are handled sensitively and professionally;
- integrate GBV/SEA/SH risk management into the broader GRM framework.

### *Guiding Principles*

GBV/SEA/SH cases will be handled based on internationally recognized principles.

**Table 21: Guiding Principles for GBV/SEA/SH Case Handling**

| Principle                         | Description                                                 |
|-----------------------------------|-------------------------------------------------------------|
| <b>Confidentiality</b>            | No disclosure of survivor identity without consent          |
| <b>Survivor-Centered Approach</b> | Survivor decides course of action                           |
| <b>Safety</b>                     | Protection from retaliation or harm                         |
| <b>Non-Discrimination</b>         | Equal treatment regardless of gender, status, or background |
| <b>Informed Consent</b>           | No action taken without survivor approval                   |
| <b>Do No Harm</b>                 | Avoid re-traumatization                                     |

### **6.6.2 GBV/SEA/SH Reporting Channels**

Recognizing the sensitivity of such cases, multiple confidential reporting channels will be established.

**Table 22: GBV/SEA/SH Reporting Channels**

| Channel                 | Description                                |
|-------------------------|--------------------------------------------|
| Dedicated hotline       | Confidential phone reporting               |
| Community focal persons | Trained individuals at community level     |
| Health facilities       | Direct reporting through service providers |
| NGOs / CSOs             | Specialized GBV support organizations      |
| National helplines      | SWCES, Orange Support Centre               |

### **6.6.3 Referral Mechanism**

Unlike general grievances, the GRM does not investigate GBV/SEA/SH cases directly. Instead, it functions as a referral mechanism, ensuring that survivors receive appropriate professional support.

### Referral Pathway (Matrix)

| Step   | Action                           | Responsible Entity            |
|--------|----------------------------------|-------------------------------|
| Step 1 | Receive complaint confidentially | GRM focal point               |
| Step 2 | Obtain survivor consent          | Trained personnel             |
| Step 3 | Refer to GBV service provider    | Health / Social Welfare / NGO |
| Step 4 | Provide support services         | GBV service provider          |
| Step 5 | Record case (anonymized)         | GRM system                    |
| Step 6 | Confirm case closure             | Service provider → GRM        |

### Key Service Providers

- Domestic Violence and Victims Support Unit (DOVVSU)
- Department of Social Welfare
- Health facilities
- NGOs/CSOs specializing in GBV
- National helplines (SWCES, Orange Support Centre)

#### 6.6.4 Data Handling and Confidentiality

Strict protocols are required to protect survivor identity and prevent harm.

### Data Recording Rules

The GRM will only record:

- nature of complaint (as described by survivor);
- whether perpetrator is linked to project;
- basic demographic information (if consented);
- whether referral was made.

### The following will NOT be recorded:

- detailed personal identifiers;
- sensitive personal history;
- any information without consent.

#### 6.6.5 Institutional Roles in GBV/SEA/SH Handling

**Table 23: Institutional Responsibilities**

| Institution       | Role                               |
|-------------------|------------------------------------|
| AMA / PCU         | Overall coordination and oversight |
| GRM Focal Point   | Intake and referral                |
| DOVVSU            | Legal support and protection       |
| Social Welfare    | Psychosocial support               |
| Health Facilities | Medical care                       |
| NGOs / CSOs       | Counseling and survivor support    |

#### 6.6.6 Awareness and Capacity Building

To ensure effective implementation:

- all project staff and contractors will receive GBV/SEA/SH training;

- community awareness campaigns will be conducted;
- codes of conduct will be enforced for workers;
- PAPs will be informed about reporting channels.

#### 6.6.7 Integration with RAP and Project Systems

The GBV/SEA/SH mechanism is integrated into the RAP by:

- addressing risks associated with economic displacement and vulnerability;
- ensuring protection of women and vulnerable groups;
- linking with labour management procedures and community engagement;
- strengthening overall social risk management.

#### 6.6.8 Monitoring and Reporting

**Table 24: Monitoring Indicators**

| Indicator                    | Description          |
|------------------------------|----------------------|
| Number of GBV cases reported | Anonymized count     |
| Number of referrals made     | To service providers |
| Resolution status            | Closed / ongoing     |
| Time taken for referral      | Response efficiency  |

#### Reporting Approach

- No personal data disclosed in reports;
- Only aggregated, anonymized data shared;
- Regular reporting to AMA, GARCC, and financiers.

#### Conclusion

The GBV/SEA/SH-sensitive grievance mechanism ensures that the project meets international best practice standards, protects vulnerable individuals, and provides safe, confidential, and effective support pathways. It strengthens the overall GRM and ensures compliance with AfDB safeguards.

### 6.7 Monitoring and Reporting on Grievances

Monitoring and reporting are essential to ensure that the Grievance Redress Mechanism (GRM) is effective, transparent, and responsive throughout RAP implementation. This section establishes the framework for tracking grievances, evaluating system performance, and ensuring continuous improvement. This RAP emphasizes the need for systematic documentation, tracking, and reporting of grievances to support accountability and stakeholder confidence. In line with AfDB Operational Safeguard 5 (OS5), this RAP ensures that grievance data is regularly monitored, analyzed, and reported to relevant stakeholders, including project authorities and financiers.

#### 6.7.1 Objectives of Monitoring and Reporting

The objectives are to:

- track the number, type, and status of grievances;

- assess the efficiency and effectiveness of grievance resolution;
- identify recurring or systemic issues requiring corrective action;
- ensure accountability of institutions responsible for GRM implementation;
- provide evidence for RAP performance monitoring and completion audit.

### 6.7.2 Monitoring Framework

The monitoring framework defines key performance indicators (KPIs) to evaluate the functionality and effectiveness of the GRM.

**Table 25: GRM Monitoring Indicators**

| Indicator                               | Description                    | Purpose                          |
|-----------------------------------------|--------------------------------|----------------------------------|
| Number of grievances received           | Total complaints recorded      | Measure accessibility and uptake |
| Number of grievances resolved           | Total cases closed             | Measure effectiveness            |
| Resolution rate (%)                     | % of grievances resolved       | Performance indicator            |
| Average resolution time                 | Time taken to resolve cases    | Efficiency measure               |
| Number of pending cases                 | Open grievances                | Identify backlog                 |
| Type/category of grievances             | Compensation, livelihood, etc. | Trend analysis                   |
| Recurrence of grievances                | Repeat issues                  | Identify systemic problems       |
| Number of escalated cases               | Cases moved to higher levels   | Assess complexity                |
| Number of GBV/SEA/SH cases (anonymized) | Sensitive cases reported       | Monitor social risk              |
| PAP satisfaction level                  | Feedback from complainants     | Assess quality of resolution     |

### 6.7.3 Data Collection and Management

All grievance data will be captured through the centralized grievance register described in Section 6.3 and maintained by the AMA.

#### Key Data Management Measures

- all grievances recorded with unique reference numbers;
- regular updating of case status (open, under review, resolved, closed);
- integration of grievance data into RAP monitoring systems;
- secure storage of data to ensure confidentiality;
- restricted access to sensitive information, particularly GBV/SEA/SH cases.

### 6.7.4 Reporting Structure and Responsibilities

Reporting will occur at multiple levels to ensure transparency and accountability across institutions.

**Table 26: GRM Reporting Structure**

| Level                       | Responsibility               | Reporting Output            | Frequency            |
|-----------------------------|------------------------------|-----------------------------|----------------------|
| Contractor / CGSCs          | Maintain grievance logs      | Site-level reports          | Monthly              |
| AMA (PCU / PRCC)            | Consolidate and analyze data | GRM performance report      | Monthly / Quarterly  |
| GARCC                       | Oversight and review         | Regional monitoring reports | Quarterly            |
| Financiers (AfDB, partners) | Review compliance            | RAP monitoring reports      | Quarterly / Annually |

### 6.7.5 Feedback and Learning Mechanisms

#### Preamble

The GRM is not only a complaint-handling tool but also a **feedback mechanism** to improve project implementation.

#### Key Feedback Mechanisms

- regular stakeholder meetings to share grievance trends;
- community feedback sessions to validate resolutions;
- integration of lessons learned into RAP and ESMP adjustments;
- adaptive management to address emerging risks.

#### Disclosure of GRM Performance

To promote transparency:

- summary grievance data will be shared with stakeholders;
- key trends and resolutions will be communicated during community meetings;
- RAP monitoring reports will include GRM performance summaries;
- no personal or sensitive data will be disclosed.

### 6.7.6 Link to RAP Monitoring and Completion Audit

GRM performance is a critical component of RAP monitoring and evaluation.

#### Key Linkages

- grievance data informs RAP implementation performance;
- unresolved grievances are tracked as **non-compliance issues**;
- GRM records provide evidence for the **RAP Completion Audit**;
- satisfaction levels contribute to determining whether RAP objectives have been achieved.

### 6.7.7 Key Performance Targets and Continuous Improvement

**Table 24: GRM Performance Targets**

| Indicator            | Target                       |
|----------------------|------------------------------|
| Resolution rate      | ≥ 90% of grievances resolved |
| Resolution timeframe | ≤ 30 days for most cases     |
| Acknowledgment time  | ≤ 5 days                     |
| Escalation rate      | ≤ 10% of cases               |
| PAP satisfaction     | ≥ 80% satisfied              |

#### Continuous Improvement

The GRM will be continuously improved through:

- periodic review of procedures;
- capacity building for GRM personnel;
- stakeholder feedback;
- alignment with evolving AfDB and national requirements.

#### Conclusion

The monitoring and reporting framework ensures that the GRM remains functional, transparent, and accountable, providing a strong mechanism for managing grievances and supporting successful RAP implementation. It enables the project to identify issues early, respond effectively, and maintain stakeholder trust throughout the project lifecycle.

### 6.8 Budget for GRM Implementation

The Grievance Redress Mechanism (GRM) for this RAP/LRP has been designed to be efficient, cost-effective, and fully integrated into existing institutional systems, particularly those of the Accra Metropolitan Assembly (AMA) and community-level structures. In line with AfDB OS5 requirements, the GRM must remain functional, accessible, and responsive, while avoiding unnecessary duplication of structures and costs. This revised budget adopts a lean implementation model, leveraging:

- existing AMA staff and administrative systems;
- ESIA-established stakeholder engagement platforms;
- community-based grievance committees (CGSCs);
- low-cost digital communication tools (e.g., WhatsApp, mobile reporting).

The budget therefore prioritizes critical functions only, including coordination, awareness, grievance handling, and monitoring.

## GRM Budget Matrix

Table 27: GRM Implementation Budget

| Budget Item                                   | Description                                      | Unit     | Quantity | Unit Cost (USD) | Total Cost (USD) |
|-----------------------------------------------|--------------------------------------------------|----------|----------|-----------------|------------------|
| <b>A. Institutional Setup</b>                 |                                                  |          |          |                 |                  |
| GRM setup & documentation                     | Procedures, templates, integration with ESIA GRM | Lump sum | 1        | 1,500           | 1,500            |
| Support to CGSCs                              | Basic logistics (meetings, coordination)         | Lump sum | 1        | 2,000           | 2,000            |
| <b>Subtotal A</b>                             |                                                  |          |          |                 | <b>3,500</b>     |
| <b>B. Staffing and Operations</b>             |                                                  |          |          |                 |                  |
| GRM Focal Person (part-time)                  | AMA/PCU staff support (allowance)                | Year     | 1        | 4,000           | 4,000            |
| Community focal persons                       | Allowances for CGSC reps                         | Year     | 8        | 300             | 2,400            |
| <b>Subtotal B</b>                             |                                                  |          |          |                 | <b>6,400</b>     |
| <b>C. Training and Capacity Building</b>      |                                                  |          |          |                 |                  |
| GRM training workshop                         | AMA, contractors, CGSCs                          | Session  | 2        | 1,500           | 3,000            |
| GBV/SEA/SH orientation                        | Integrated into GRM training                     | Session  | 1        | 1,000           | 1,000            |
| <b>Subtotal C</b>                             |                                                  |          |          |                 | <b>4,000</b>     |
| <b>D. Communication and Awareness</b>         |                                                  |          |          |                 |                  |
| Community sensitization                       | Meetings, announcements                          | Lump sum | 1        | 2,500           | 2,500            |
| Printing materials                            | Posters, forms, leaflets                         | Lump sum | 1        | 800             | 800              |
| Hotline (mobile-based)                        | Phone + airtime/WhatsApp                         | Year     | 1        | 1,200           | 1,200            |
| Suggestion boxes                              | Procurement (limited)                            | Unit     | 5        | 80              | 400              |
| <b>Subtotal D</b>                             |                                                  |          |          |                 | <b>4,900</b>     |
| <b>E. Grievance Handling &amp; Resolution</b> |                                                  |          |          |                 |                  |
| Field verification                            | Transport/logistics for investigations           | Lump sum | 1        | 2,500           | 2,500            |

| Budget Item                        | Description                   | Unit     | Quantity | Unit Cost (USD) | Total Cost (USD) |
|------------------------------------|-------------------------------|----------|----------|-----------------|------------------|
| Mediation meetings                 | Community dispute resolution  | Lump sum | 1        | 1,500           | 1,500            |
| <b>Subtotal E</b>                  |                               |          |          |                 | <b>4,000</b>     |
| <b>F. Monitoring and Reporting</b> |                               |          |          |                 |                  |
| GRM tracking system                | Simple database (Excel-based) | Lump sum | 1        | 800             | 800              |
| Reporting & documentation          | RAP monitoring integration    | Lump sum | 1        | 1,200           | 1,200            |
| <b>Subtotal F</b>                  |                               |          |          |                 | <b>2,000</b>     |

**Total Estimated GRM Budget: USD 24,800**

**Contingency Provision of \$200**

**Grand Total GRM Budget: USD 25,000**

#### **6.8.1 Cost Optimization Strategy**

The reduced budget is achievable through:

- integration with ESIA GRM systems, avoiding duplication;
- use of existing AMA personnel (no full-time new hires);
- reliance on community-based structures (CGSCs);
- adoption of low-cost digital tools instead of expensive systems;
- combining training sessions (GRM + GBV);
- minimizing infrastructure (limited suggestion boxes, simple database).

#### **6.8.2 Risk Consideration**

While cost-efficient, this approach requires:

- strong institutional coordination by AMA;
- timely funding availability;
- active engagement of community structures;
- continuous monitoring to avoid system overload.

#### **Conclusion**

This optimized budget ensures that the GRM remains fully functional, accessible, and compliant with AfDB OS5, while maintaining cost efficiency. It provides a practical and implementable framework suited to the scale and nature of the project, without compromising effectiveness.

## 7. IMPACT ASSESSMENT AND RESETTLEMENT NEEDS

This chapter presents a detailed assessment of the nature, scale, and significance of impacts arising from the project, with a specific focus on economic displacement, livelihood disruption, and resettlement needs. The analysis is informed by:

- Census and asset inventory findings
- ESIA baseline conditions
- Field observations and site verification (see Photo 3 from site photos provided)



**Photo 3: Field observations and site verification indicating land as scrap dump site.**

The assessment confirms that the project area is an active informal scrap and waste economy hub, characterized by:

- high concentration of scrap materials and recyclable stock;
- informal structures and operational spaces;
- strong dependency on waste streams for income generation.

As visually evidenced in the site images:

- Large volumes of scrap metals, car parts, and recyclables are stockpiled;
- Presence of informal sheds, containers, and workspaces;
- Active economic activity and occupation of space;

- Indicators of semi-permanent livelihood systems.

This reinforces that economic displacement is the dominant impact, with limited physical displacement.

### 7.1 Nature of Project Impacts

The project will result in both direct and indirect impacts on Project Affected Persons (PAPs), primarily affecting access to livelihood resources, business locations, and informal economic networks.

**Table 28: Types of Project Impacts**

| Impact Type                     | Description                                                       | Affected Groups                | Significance |
|---------------------------------|-------------------------------------------------------------------|--------------------------------|--------------|
| Economic Displacement           | Loss of income due to restricted access to site and waste streams | Scrap dealers, waste pickers   | High         |
| Physical Displacement (limited) | Loss of temporary structures (2 sheds/kiosks)                     | Meeting area for scrap dealers | Low          |
| Access Restriction              | Loss of access to waste materials and trading space               | All PAPs                       | High         |
| Livelihood Disruption           | Breakdown of value chains and supply networks                     | Entire informal sector         | High         |
| Social Impact                   | Increased potential conflict                                      | All PAPs                       | High         |

### 7.2 Impact Sensitivity and Exposure

The sensitivity of impacts is amplified by the socio-economic characteristics of PAPs, as confirmed in Chapter 6 .

**Table 29: Impact Sensitivity Matrix**

| Factor                 | Condition Observed                   | Sensitivity Level |
|------------------------|--------------------------------------|-------------------|
| Livelihood Dependency  | High reliance on scrap/waste economy | High              |
| Informality            | No formal contracts or protections   | High              |
| Mobility               | Limited relocation options           | High              |
| Financial Resilience   | Daily income, low savings            | High              |
| Skills Diversification | Limited alternative skills           | High              |

### 7.3 Spatial Footprint of Impacts

The impacts extend beyond the immediate project site into the **Area of Influence (AoI)** due to interconnected waste value chains.

### Key Observations from Site Images

- Extensive scrap aggregation zones (large compressed metal stacks)
- Vehicle dismantling areas
- Storage of recyclables and business stock
- Informal operational clusters and trade zones
- Presence of support infrastructure (containers, sheds, equipment)

**Table 30: Spatial Impact Zones**

| Zone                   | Description                              | Impact Type                  |
|------------------------|------------------------------------------|------------------------------|
| Core Project Site      | Occupied by scrap dealers and structures | Direct economic displacement |
| Immediate Surroundings | Waste sorting and trading areas          | Access restriction           |
| Wider AoI              | Linked value chain actors                | Indirect economic impact     |

#### 7.4 Magnitude of Impacts

Impact magnitude is assessed based on scale, duration, and reversibility.

**Table 31: Impact Magnitude Assessment**

| Impact                 | Scale            | Duration   | Reversibility | Magnitude |
|------------------------|------------------|------------|---------------|-----------|
| Loss of income         | Large (104 PAPs) | Long-term  | Difficult     | High      |
| Loss of structures     | Limited          | Short-term | Replaceable   | Medium    |
| Loss of access         | Extensive        | Long-term  | Difficult     | High      |
| Value chain disruption | System-wide      | Long-term  | Moderate      | High      |

#### 7.5 Vulnerable Groups Impact Analysis

Based on the census and socio-economic survey results presented in Chapter 8, few Project Affected Persons (PAPs) were formally identified as vulnerable under the criteria applied in this RAP. This reflects the relatively homogenous composition of PAPs, who are predominantly economically active individuals engaged in informal scrap and waste-related activities. However, in line with AfDB Operational Safeguard 5 (OS5) and good international practice, the RAP adopts a precautionary and adaptive approach. It recognizes that vulnerability may not always be fully captured during baseline surveys and may emerge during relocation, compensation, or livelihood restoration phases. Accordingly, the RAP includes a continuous screening mechanism during implementation to identify any PAPs who may become vulnerable due to:

- income disruption;
- relocation challenges;
- health or mobility constraints;
- social or economic exclusion.

Where such cases arise, appropriate support will be provided through the RAP implementation arrangements and the Grievance Redress Mechanism (GRM).

**Table 32: Vulnerability Screening and Contingency Support Framework**

| Potential Vulnerability Category              | Potential Risk                                | Impact Level (If Identified) | Contingency Support Measure                                         |
|-----------------------------------------------|-----------------------------------------------|------------------------------|---------------------------------------------------------------------|
| Women (if identified during implementation)   | Reduced income or limited access to resources | Moderate-High                | Targeted livelihood follow-up and inclusion in restoration programs |
| Youth (if identified at risk)                 | Dependence on informal employment             | Moderate-High                | Skills training and employment linkage support                      |
| Elderly (if identified)                       | Reduced adaptability to relocation            | Moderate-High                | Assisted relocation and follow-up support                           |
| Persons with Disabilities (PWDs)              | Physical or operational access barriers       | Moderate-High                | Accessible relocation arrangements and tailored assistance          |
| Economically distressed PAPs (emerging cases) | Income instability post-relocation            | High                         | Additional livelihood support and monitoring                        |

Although no vulnerable PAPs were identified at the census stage, the RAP maintains a responsive and inclusive framework to ensure that any emerging vulnerability is promptly identified and addressed. This approach ensures continued alignment with AfDB OS5 requirements and safeguards the equitable treatment of all PAPs throughout implementation.

## 7.6 Livelihood Impact Assessment

Livelihoods are location-specific and resource-dependent, making them highly sensitive to disruption.

**Table 33: Livelihood Impact Matrix**

| Livelihood Type  | Dependency    | Impact                         | Severity |
|------------------|---------------|--------------------------------|----------|
| Scrap dealers    | Site-based    | Loss of business space & stock | High     |
| Waste pickers    | Waste streams | Loss of access to materials    | High     |
| Informal traders | Site activity | Reduced demand                 | Medium   |
| Transporters     | Value chain   | Reduced activity               | Medium   |

## 7.7 Resettlement Needs Assessment

Based on the impact analysis, resettlement needs are primarily economic and livelihood-based, rather than physical relocation.

**Table 34: Resettlement Needs Matrix**

| Need Type              | Description                              | Priority Level |
|------------------------|------------------------------------------|----------------|
| Livelihood Restoration | Income recovery and support programs     | Critical       |
| Relocation Support     | Alternative workspaces for scrap dealers | High           |
| Integration Measures   | Inclusion in formal waste systems        | Critical       |
| Vulnerability Support  | Targeted assistance programs             | Critical       |

## 7.8 Key Findings

The assessment confirms that:

- The site is an active economic ecosystem, not vacant land (strongly supported by images);
- Economic displacement is the dominant impact affecting 104 PAPs;
- Physical displacement is minimal but present (limited structures);
- Livelihoods are highly sensitive and location-dependent;
- The project will disrupt an entire informal value chain, not just individuals;
- Without intervention, impacts could lead to:
  - income loss
  - increased poverty
  - social conflict

## 7.9 Implications for RAP/LRP Design

**Table 35: Strategic Response Framework**

| Impact                  | Required RAP Response                     |
|-------------------------|-------------------------------------------|
| Economic displacement   | Comprehensive Livelihood Restoration Plan |
| Loss of workspaces      | Relocation & site allocation              |
| Informal exclusion risk | Integration into formal system            |
| Vulnerability           | Targeted social support                   |
| Value chain disruption  | System-level intervention                 |

## Conclusion

This chapter establishes that the project will have significant socio-economic impacts, primarily driven by economic displacement within a highly informal and vulnerable system.

Therefore, the RAP must go beyond compensation and deliver:

- livelihood restoration
- economic integration
- inclusive development outcomes

## 8. CENSUS, ASSET INVENTORY AND SOCIO-ECONOMIC SURVEY (FINAL VERSION)

This chapter presents the verified baseline data on Project Affected Persons (PAPs), their assets, and socio-economic conditions. It provides the empirical foundation for determining eligibility, compensation, and livelihood restoration measures under this RAP/LRP.

The census and asset inventory build upon:

- ESIA findings on informal economic activity within the project footprint;
- detailed field surveys and stakeholder consultations;
- direct site observations, including extensive scrap aggregation, dismantling, and trading operations (see Photo 3).

The assessment confirms that the project site is actively occupied and economically productive, supporting a structured informal scrap economy with established value chains and livelihood systems. This chapter therefore establishes:

- who is affected (PAPs);
- what is affected (assets and livelihoods);
- how they are affected (degree of dependency and vulnerability).

### 8.1 Objectives of the Census and Asset Inventory

The census and asset inventory were conducted to:

- identify and register all PAPs within the project area;
- establish a baseline database for compensation and livelihood restoration;
- document all affected assets, including structures and livelihood resources;
- assess socio-economic characteristics of PAPs;
- identify vulnerable individuals and groups;
- establish a cut-off date to prevent speculative claims.

### 8.2 Methodology and Approach

The methodology followed AfDB OS5 requirements and international good practice, combining quantitative surveys and qualitative engagement.

#### Key Methods

- **Desk Review**
  - ESIA reports
  - site maps and land documentation
- **Field Enumeration**
  - physical identification of PAPs and business units
  - mapping of operational zones
- **Asset Inventory**
  - documentation of structures, equipment, and stock
  - classification of movable and immovable assets
- **Socio-Economic Surveys**

- household and business interviews
- income and dependency analysis
- **Stakeholder Consultations**
  - scrap dealer associations
  - informal workers and operators

### **Site Observations (Critical Evidence)**

Field verification (supported by images provided) confirmed:

- large-scale scrap stockpiling (vehicles, metals, parts);
- semi-permanent structures (containers, sheds, kiosks);
- organized economic clusters (scrap dealers, dismantlers);
- active workforce presence and daily operations.

These observations validate that:

- assets are income-generating capital, not waste;
- displacement will directly affect business continuity and income streams.

## **8.3 Cut-off Date: Definition and Disclosure**

A cut-off date was established to ensure that only legitimate PAPs are eligible for compensation and assistance. Officially, 30 April 2026 represents the date of completion of the draft RAP report, while 8 May 2026 represents the officially disclosed and adopted cut-off date following stakeholder validation and confirmation of the PAP database.

### **Definition**

The cut-off date is defined as:

*The date on which the census and asset inventory of PAPs was completed.*

### **Implementation**

- publicly disclosed during consultations;
- communicated through community leaders and associations;
- reinforced during field enumeration exercises.

### **Implication**

- persons occupying the site after the cut-off date are not eligible for compensation;
- prevents speculative settlement and asset inflation.

## **8.4 Identification of Project Affected Persons (PAPs)**

The census identified individuals and groups whose livelihoods, assets, or access to resources will be affected by the project.

**Table 41: Summary of PAPs**

| PAP Category                               | Estimated Number | Description                                                      |
|--------------------------------------------|------------------|------------------------------------------------------------------|
| Scrap Dealers                              | 90               | Main operators owning scrap stock, business space, and equipment |
| Waste Pickers                              | 3                | Collectors dependent on waste streams                            |
| Informal Workers                           | 4                | Assistants, loaders, dismantlers, and support labour             |
| Traders -Food vendors/<br>Support Services | 7                | Food vendors and small support-service providers                 |
| <b>Total</b>                               | <b>104</b>       |                                                                  |

**Table 36: Categories of PAPs / PAP Classification**

| Category                       | Description                   | Impact Type |
|--------------------------------|-------------------------------|-------------|
| Economically Displaced         | Loss of income sources        | High        |
| Physically Displaced (limited) | Loss of structures/workspaces | low         |
| Vulnerable PAPs                | Women, youth, elderly, PWDs   | High        |

### 8.5 Inventory of Affected Assets

The asset inventory captured both physical and livelihood-related assets, recognizing that in informal economies, business capital is often embedded in materials and stock.

**Table 37: Asset Inventory Summary**

| Asset Type      | Description                    | Impact             |
|-----------------|--------------------------------|--------------------|
| Land/Space      | Informally occupied work areas | Loss of access     |
| Structures      | Sheds, kiosks, containers      | Partial loss       |
| Scrap Materials | Metals, vehicles, parts        | Business capital   |
| Equipment       | Tools, machinery               | Operational impact |
| Access to Waste | Resource streams               | Critical loss      |

### 8.6 Socio-Economic Characteristics of PAPs

The socio-economic survey highlights the vulnerability and dependency of PAPs on site-based livelihoods.

**Table 44: Socio-Economic Profile**

| Indicator   | Observation     |
|-------------|-----------------|
| Income Type | Daily, informal |

|                  |                        |
|------------------|------------------------|
| Income Stability | Highly variable        |
| Education Level  | Generally low          |
| Employment Type  | Self-employed/informal |
| Savings Capacity | Limited                |
| Dependency Ratio | High                   |

**Table 38: Livelihood Dependency Analysis**

| Livelihood Group | Dependency on Site | Risk Level |
|------------------|--------------------|------------|
| Scrap Dealers    | Very high          | Critical   |
| Waste Pickers    | Very high          | Critical   |
| Informal Workers | Moderate           | Medium     |
| Traders          | Moderate           | Medium     |

**Table 39: Vulnerability Assessment**

| Group   | Characteristics        | Support Needs     |
|---------|------------------------|-------------------|
| Women   | Limited capital access | Financial support |
| Youth   | High unemployment      | Skills training   |
| Elderly | Limited mobility       | Social assistance |
| PWDs    | Access challenges      | Inclusive support |

## 8.7 Summary of Impacts by PAP Category

**Table 47: Impact Summary Matrix**

| PAP Category     | Type of Loss                      | Severity |
|------------------|-----------------------------------|----------|
| Scrap Dealers    | Business loss, stock displacement | High     |
| Waste Pickers    | Loss of access to materials       | High     |
| Informal Workers | Loss of employment                | medium   |
| Traders          | Reduced demand                    | Medium   |

### Key Findings

The census and asset inventory confirm that:

- the project site is an active informal economic hub, not vacant land;
- PAPs depend on location-specific livelihoods;
- assets are primarily business capital (scrap materials and tools);
- economic displacement will have significant livelihood impacts;
- vulnerability levels are high across all PAP categories.

### Implications for RAP Implementation

**Table 40: Strategic Implications**

| Finding                  | Required Response             |
|--------------------------|-------------------------------|
| High economic dependency | Strong livelihood restoration |

|                              |                                |
|------------------------------|--------------------------------|
| Informal asset base          | Flexible compensation approach |
| Limited financial resilience | Transitional support required  |
| Vulnerability                | Targeted assistance programs   |

### **Conclusion**

This chapter provides the verified evidence base for RAP implementation. It establishes the scale and nature of affected populations and assets, ensuring that subsequent chapters on entitlements, compensation, and livelihood restoration are grounded in accurate and defensible data, consistent with AfDB OS5 requirements.

## 9. ELIGIBILITY, ENTITLEMENTS AND COMPENSATION

This chapter defines the eligibility criteria, entitlement framework, and compensation principles applicable to Project Affected Persons (PAPs), in accordance with AfDB Operational Safeguard 5 (OS5) and Ghanaian legal requirements.

The framework is designed to ensure that all PAPs affected by the project, particularly those subject to economic displacement and relocation to a new site are:

- fairly and adequately compensated at full replacement cost;
- provided with transitional support during relocation;
- enabled to restore and improve their livelihoods at the new site;
- supported through structured integration into a formalized economic system.

Given that the project involves the relocation of a functioning informal scrap economy, this framework goes beyond conventional compensation to include:

- business continuity support
- site re-establishment assistance
- livelihood restoration measures

### 9.1 Eligibility Criteria

Eligibility criteria establish the basis for determining which individuals and groups are entitled to compensation, resettlement assistance, and livelihood restoration support under this Resettlement Action Plan (RAP). This is a fundamental component of RAP implementation, as it ensures that all affected persons are treated fairly, consistently, and in accordance with applicable safeguard standards. The eligibility framework for this RAP is derived from the census, asset inventory, and socio-economic survey results presented in Chapter 8, which provide the verified database of Project Affected Persons (PAPs), their assets, and livelihood dependencies within the project footprint and its area of influence. In line with AfDB Operational Safeguard 5 (OS5): Land Acquisition, Involuntary Resettlement and Economic Displacement, eligibility is determined based on the nature of impact (rather than legal status of land tenure). This is particularly important in the context of this project, where the majority of PAPs operate within an informal economic system without formal land ownership or legal title, yet derive substantial livelihoods from site-based activities. Accordingly, this RAP adopts the following key principles:

- All PAPs who are adversely affected by project-related land acquisition, access restriction, or economic displacement prior to the cut-off date are eligible for compensation and/or assistance, regardless of their legal tenure status;
- Informal users and occupants, including scrap dealers, waste pickers, and informal workers, are recognized as legitimate PAPs due to their economic dependence on the site;
- Eligibility extends to both directly affected individuals (e.g., operators and asset owners) and indirectly affected persons (e.g., workers and support service providers) whose livelihoods are linked to site-based activities;
- The eligibility framework distinguishes between different categories of PAPs to ensure that entitlements are proportionate to the type and severity of impact;
- A clearly defined and publicly disclosed cut-off date is applied to prevent opportunistic claims and ensure the integrity of the compensation process.

Furthermore, given that the project involves the relocation of an organized informal economic cluster to a new site, eligibility criteria also incorporate provisions to ensure that affected PAPs are not only compensated but are also supported in re-establishing their economic activities in a sustainable manner.

This eligibility framework therefore provides the foundation for:

- the entitlement matrix (Section 9.3);
- the compensation and relocation packages;
- and the livelihood restoration measures (Chapter 10).

**Table 41: Eligibility Criteria**

| Category                                     | Eligibility Status | Description                                                        |
|----------------------------------------------|--------------------|--------------------------------------------------------------------|
| PAPs with assets on site before cut-off date | Eligible           | Scrap dealers, workers, traders operating within project footprint |
| PAPs with informal land use (no legal title) | Eligible           | Recognized under OS5 for livelihood impacts                        |
| PAPs economically dependent on site          | Eligible           | Individuals relying on site-based income                           |
| PAPs arriving after cut-off date             | Not eligible       | Excluded from compensation                                         |

### **Key Principle**

Lack of legal title does NOT disqualify PAPs  
(critical AfDB OS5 requirement)

## **9.2 Cut-Off Date Application**

The application of a clearly defined and effectively communicated cut-off date is a critical safeguard measure under this RAP. It establishes the official point at which eligibility for compensation, relocation assistance, livelihood restoration support, and other resettlement benefits is determined. This ensures that support is provided only to Project Affected Persons (PAPs) whose presence, assets, or livelihood activities were verified during the census and asset inventory process described in Chapter 8. Given that the project site is occupied mainly by informal economic actors, including scrap dealers, informal workers, and support service providers, the cut-off date is particularly important for maintaining fairness, transparency, and credibility. It prevents speculative occupation, discourages the creation of artificial claims, and protects the integrity of the RAP implementation process. The current RAP draft already confirms that the project is primarily dealing with economic displacement of informal waste-sector actors and that eligibility must be based on verified PAP status and asset records. In line with AfDB Operational Safeguard 5 (OS5), the cut-off date does not exclude genuine non-title holders who were present before the census. Rather, it ensures that all legitimate affected persons are recognized, while persons entering the site after the cut-off date do not create new compensation obligations for the project. Officially, 30 April 2026 represents the date of

completion of the draft RAP report, while 8 May 2026 represents the officially disclosed and adopted cut-off date following stakeholder validation and confirmation of the PAP database.

### 9.2.1 Definition and Application

For the purposes of this RAP, the cut-off date is defined as the final date of completion of the census and asset inventory of PAPs within the project footprint and directly affected operational areas. The meaning of application of the cut-off date is indicated in the table below.

**Table 42: Defining and applying cut-off dates**

| Application Area       | Requirement                                                                                               | Implication                                          |
|------------------------|-----------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| PAP eligibility        | Only PAPs identified, registered, and verified during the census are eligible                             | Prevents inclusion of unverified claimants           |
| Asset eligibility      | Only assets recorded before or during the asset inventory are eligible                                    | Prevents post-census construction or asset inflation |
| Livelihood eligibility | Only livelihood activities verified during the census qualify for restoration support                     | Ensures support targets genuine income loss          |
| New entrants           | Persons who occupy, establish assets, or begin economic activity after the cut-off date are not eligible  | Prevents opportunistic claims                        |
| PAP categories         | Applies to scrap dealers, waste pickers, informal workers, support service providers, and vulnerable PAPs | Ensures consistent treatment across groups           |

The cut-off date therefore becomes the official baseline for compensation planning, relocation-site allocation, livelihood restoration support, and grievance review.

### 9.2.2 Rationale for the Cut-Off Date

The cut-off date is essential because the project site is an active informal economic space where people, materials, and structures can change quickly. Without a cut-off date, the RAP could be exposed to inflated claims, new entrants, and disputes over who should benefit. The cut-off date is applied to Prevent speculative occupation, prevent artificial asset creation, protect genuine PAPs, Support fair budgeting and Improve implementation efficiency (see table below).

**Table 43: Rationale for cut-off date**

| Rationale                         | Explanation                                                                                        |
|-----------------------------------|----------------------------------------------------------------------------------------------------|
| Prevent speculative occupation    | Discourages people from moving onto the site after learning of compensation or relocation benefits |
| Prevent artificial asset creation | Avoids deliberate construction of temporary structures or stockpiling solely to claim benefits     |

| Rationale                         | Explanation                                                                                  |
|-----------------------------------|----------------------------------------------------------------------------------------------|
| Protect genuine PAPs              | Ensures verified PAPs are not disadvantaged by late entrants                                 |
| Support fair budgeting            | Allows compensation, relocation, and livelihood restoration costs to be estimated accurately |
| Improve implementation efficiency | Enables timely planning for relocation, payment, and support packages                        |
| Reduce disputes                   | Creates a transparent eligibility boundary that can be explained and verified                |

This is particularly important because the RAP involves relocation to a new site. The cut-off date helps determine who qualifies for space allocation, relocation logistics, transitional support, and livelihood restoration assistance.

### 9.2.3 Disclosure and Communication

The cut-off date of 21 days, which ends by 8<sup>th</sup> of May 2026 was clearly communicated to PAPs and stakeholders before, during, and immediately after the census process on the 7<sup>th</sup> of April 2026. Disclosure is necessary to ensure that all affected persons understand the meaning of the cut-off date and its implications for eligibility. The cut-off date was disclosed through the following channels indicated in the table below.

| Disclosure Channel            | Target Audience                                        | Purpose                                           |
|-------------------------------|--------------------------------------------------------|---------------------------------------------------|
| PAP group meetings            | Scrap dealers, waste pickers, informal workers         | Explain eligibility and registration requirements |
| Community meetings            | Nearby communities and local stakeholders              | Prevent misinformation and speculative occupation |
| AMA / Sub-Metro communication | Local authorities and implementing agencies            | Ensure consistent official messaging              |
| PAP associations              | Organized scrap dealers and informal service providers | Validate membership and affected persons          |
| Site notices                  | Persons operating within the project footprint         | Provide visible reminder of the cut-off date      |
| Local language communication  | Ga, Twi, and English speakers                          | Ensure full understanding among PAPs              |

Communication explained that the cut-off date does not remove the rights of verified PAPs. Instead, it protects genuine PAPs by preventing new or opportunistic claims.

### 9.2.4 Validation and Acceptance

Validation of the cut-off date is necessary to ensure that PAPs accept the census as the legitimate basis for compensation and relocation planning. This is particularly important where affected persons operate informally and may not have formal documentation of land use or business occupation. Validation was undertaken through cross-checking census records, association-level confirmation, field observation, stakeholder meetings and GRM review as indicated in the table below:

**Table 44: Validation methods and corresponding description**

| Validation Method              | Description                                                                         |
|--------------------------------|-------------------------------------------------------------------------------------|
| Cross-checking census records  | Verifying names, activities, and asset records from the PAP database                |
| Association-level confirmation | Confirming PAP status through scrap dealer representatives and site leaders         |
| Field observation              | Verifying physical presence, business activity, structures, and assets              |
| Stakeholder meetings           | Confirming the census list with PAP representatives and AMA                         |
| GRM review                     | Allowing genuine omissions or disputes to be reviewed through the grievance process |

Acceptance of the cut-off date documented through meeting minutes, attendance sheets, and signed negotiation sheets.

### 9.2.5 Enforcement Mechanisms

The cut-off date must be actively enforced to maintain the integrity of the RAP. Enforcement should be practical, transparent, and non-confrontational, while ensuring that the project does not assume obligations for new entrants after the eligibility deadline. Enforcement measures include periodic site monitoring, site notices, verification before payment, verification before relocation-site allocation, community oversight, and GRM screening as shown in the table below.

**Table 45: Enforcement Mechanisms**

| Enforcement Measure                            | Responsible Party                   | Purpose                                                 |
|------------------------------------------------|-------------------------------------|---------------------------------------------------------|
| Periodic site monitoring                       | AMA / PCU / RAP team                | Identify new entrants or new structures                 |
| Site notices                                   | AMA / Sub-Metro                     | Remind users of the cut-off date                        |
| Verification before payment                    | RAP implementation team             | Confirm PAP eligibility before compensation             |
| Verification before relocation-site allocation | AMA / PCU                           | Ensure only eligible PAPs receive space at the new site |
| Community oversight                            | PAP representatives / local leaders | Discourage speculative occupation                       |
| GRM screening                                  | GRM committee                       | Review disputed claims fairly                           |

Any person found to have entered the site after the cut-off date will be formally informed that they are not eligible for compensation, relocation assistance, or livelihood restoration support

under this RAP. However, such persons may still receive general project information and may access the GRM if they believe they were wrongly excluded.

### 9.2.6 Special Considerations

While the cut-off date is strictly applied, the RAP also recognizes that genuine errors or omissions may occur during enumeration, particularly in informal work environments where some PAPs may be absent during field surveys. Therefore, the RAP allows for limited special consideration in the table below.

**Table 46: Cases and review mechanism**

| Special Case                | Condition for Consideration                                                  | Review Mechanism                       |
|-----------------------------|------------------------------------------------------------------------------|----------------------------------------|
| Genuine omission            | PAP can demonstrate presence or livelihood activity before the cut-off date  | GRM verification                       |
| Temporary absence           | PAP was absent during census due to illness, travel, or work-related reasons | Association/community confirmation     |
| Disputed asset ownership    | More than one person claims the same asset                                   | Asset verification and mediation       |
| Vulnerable PAP not captured | Vulnerable person was missed during census                                   | Social welfare / GRM review            |
| Data entry error            | Wrong name, category, asset, or contact details recorded                     | Correction through RAP database update |

All exceptions must be evidence-based, documented, and approved through the GRM or RAP implementation team. This ensures that flexibility does not undermine the purpose of the cut-off date. The cut-off date provides a clear, transparent, and enforceable boundary for determining eligibility under this RAP. It protects genuine PAPs, prevents speculative claims, supports accurate budgeting, and ensures fair allocation of compensation, relocation assistance, and livelihood restoration measures. Its application is especially important because PAPs will be relocated to a new site, and eligibility must therefore determine not only compensation but also access to replacement operational space and associated livelihood support.

## 9.3 Entitlement Framework

The entitlement framework is the core operational component of this RAP, translating policy principles into concrete and enforceable benefits for Project Affected Persons (PAPs). It defines what each category of PAP will receive, based on the type of loss experienced, severity of impact, and vulnerability status, in full alignment with AfDB Operational Safeguard 5 (OS5) and the findings of the ESIA. Given that the ESIA confirms economic displacement as the dominant impact, with PAPs primarily consisting of informal scrap dealers, waste pickers, and associated workers, this entitlement framework is deliberately livelihood-centered and relocation-focused. A key principle underpinning this framework is that relocation is not merely physical movement, but a structured economic transition, where PAPs are:

- Relocated to a planned, serviced alternative site;
- Supported with transitional assistance;
- Integrated into the formalized waste management system;
- Enabled to restore or improve their income levels.

In line with AfDB OS5:

- Non-title holders are eligible for assistance;
- Livelihood restoration is mandatory, not optional;
- Vulnerable groups receive additional support.

**Table 47: Key Principles of the Entitlement Framework**

| Principle              | Application in this RAP                               |
|------------------------|-------------------------------------------------------|
| Equity                 | All PAPs treated fairly regardless of tenure status   |
| Replacement Cost       | No depreciation applied to structures/assets          |
| Livelihood Restoration | Central focus due to economic displacement            |
| Relocation Support     | Structured transition to alternative site             |
| Inclusiveness          | Informal actors fully recognized                      |
| Vulnerability Support  | Targeted assistance to at-risk groups                 |
| Participation          | PAPs engaged in relocation and compensation decisions |

**Table 48: Entitlement Matrix**

| Type of Loss                              | PAP Category           | Entitlement                                                  | Implementation Details                                                                                                                                                                                                                                                                       |
|-------------------------------------------|------------------------|--------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Loss of business space</b>             | Scrap dealers          | Allocation of alternative serviced site + relocation support | <ul style="list-style-type: none"> <li>- Secure, planned relocation site provided by AMA</li> <li>- Allocation based on verified PAP registry</li> <li>- Basic infrastructure (access, drainage, organization layout)</li> <li>- Transport/logistics support for moving materials</li> </ul> |
| <b>Loss of structures (sheds, kiosks)</b> | Scrap dealers, traders | Reconstruction support                                       | Reconstruction at relocation site <ul style="list-style-type: none"> <li>- Materials or technical support may be provided</li> </ul>                                                                                                                                                         |
| <b>Loss of income (temporary)</b>         | All PAPs               | Transitional livelihood allowance                            | <ul style="list-style-type: none"> <li>- Time-bound financial support during relocation and transition</li> <li>- Based on average income levels (from socio-economic survey)</li> </ul>                                                                                                     |

| Type of Loss                           | PAP Category                                        | Entitlement                                | Implementation Details                                                                                                                                                                      |
|----------------------------------------|-----------------------------------------------------|--------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                        |                                                     |                                            | - Covers business interruption period                                                                                                                                                       |
| <b>Loss of access to waste streams</b> | Scrap dealers, waste pickers                        | Priority integration into new waste system | - Formal inclusion in waste collection, sorting, or compost value chain<br>- Formation of cooperatives or structured groups<br>- Access to designated waste streams under controlled system |
| <b>Loss of employment</b>              | Informal workers (loaders, dismantlers, assistants) | Employment support and skills training     | - Job placement within project or related value chain<br>- Skills training (waste management, recycling, logistics)<br>- Linkages to contractors or service providers                       |
| <b>Vulnerability impacts</b>           | Vulnerable PAPs (women, youth, elderly, PWDs)       | Additional targeted assistance             | - Priority in site allocation and employment opportunities<br>- Top-up livelihood support<br>- Social welfare support and tailored training<br>- Flexible relocation arrangements           |

## Expanded Explanation of Entitlements

### 1. Relocation to Alternative Serviced Site (Core Entitlement)

The most critical entitlement under this RAP is the provision of an alternative, organized, and serviced relocation site.

This directly responds to the findings that PAPs:

- Depend on location-specific economic activities;
- Operate within informal but structured trading networks;
- Require physical proximity to materials and buyers.

The relocation site will therefore:

- Maintain economic functionality (not just space);
- Be designed to support organized scrap and recycling activities;
- Provide a safer and more efficient working environment.

### 2. Compensation for Structures (Replacement Cost Principle)

- Reconstruction support at the relocation site. All structures to be replaced at relocation site by AMA (project proponent).

### **3. Transitional Livelihood Support**

As agreed between PAPs and project owners, relocation will go through a transition of 6 months. If activities of relocation move beyond the six months, PAPs will receive temporary financial assistance to bridge the transition period.

This ensures:

- No immediate collapse of livelihoods;
- Time for PAPs to re-establish operations;
- Reduced vulnerability during relocation.

### **4. Integration into Formal Waste System**

A major structural change identified in the ESIA is the formalization of waste management, which could exclude informal actors if not managed properly.

This RAP converts that risk into an opportunity by ensuring:

- PAPs are prioritized for inclusion in the new system;
- Informal actors are organized into cooperatives or service groups;
- Access to waste streams is regulated but inclusive.

### **5. Employment and Skills Development**

For workers who may not operate independent businesses (e.g., assistants, loaders), the RAP provides:

- Access to employment opportunities within:
  - The composting plant,
  - Waste collection systems,
  - Recycling and logistics networks;
- Skills training programs to support transition into formal roles.

### **Strategic Importance of the Entitlement Framework**

This entitlement framework does more than compensate losses, it restructures livelihoods.

It ensures that:

- PAPs are not worse off due to the project;
- Informal workers are not excluded from modernization;
- The project contributes to inclusive urban transformation.

In conclusion, the entitlement framework establishes a clear, fair, and implementable system of compensation and support, aligned with:

- Findings on economic displacement,
- AfDB OS5 requirements,
- The project's relocation strategy.

It ensures that relocation becomes a pathway to improvement, not just displacement — positioning PAPs to transition from informal, vulnerable livelihoods into more stable, organized, and potentially more profitable economic systems.

## 9.4 Compensation for Specific Assets

Compensation for specific assets under this RAP will be guided by the principle of full replacement cost, consistent with AfDB OS5. Since the affected area functions as an informal scrap and recycling economy, compensation must distinguish between fixed business assets and movable business inventory. The purpose is not only to compensate losses, but to ensure that PAPs can restart their activities at the relocation site with minimum disruption.

### 9.4.1 Structures

Structures include temporary sheds, kiosks, containers, and other business facilities used for storage, sorting, trading, and daily operations. Although these structures may be informal, they support livelihood activities and therefore qualify for compensation or reconstruction assistance. The agreement between the project proponent and the PAPs is to reconstruct the structures at the relocation site.

**Table 49: Structure Compensation**

| Asset Type              | Compensation Approach                                        |
|-------------------------|--------------------------------------------------------------|
| Temporary sheds         | Reconstruction support at full cost to AMA                   |
| Containers              | Relocation to new site.                                      |
| Kiosks                  | Relocation to new site.                                      |
| Makeshift storage areas | Re-establishment support at new site                         |
| Workspaces / platforms  | Allocation of equivalent functional space at relocation site |

Relocation will be based on replacement value without depreciation, including materials, labour, dismantling, transport, and reinstallation where applicable.

### 9.4.2 Scrap Materials

Scrap materials are **not waste** for the purposes of this RAP. They are recognized as:

- business inventory;
- working capital;
- income-generating assets.

For this reason, the preferred approach is supported relocation rather than cash compensation.

**Table 50: Scrap Asset Compensation**

| Asset Type   | Compensation Approach                                   |
|--------------|---------------------------------------------------------|
| Scrap metals | Supported relocation to new site, not cash compensation |

|                                      |                                               |
|--------------------------------------|-----------------------------------------------|
| Vehicles and parts                   | Assisted loading, transport, and offloading   |
| Bulk stockpiles                      | Logistical relocation support                 |
| Recyclable materials                 | Sorting, packing, and transport assistance    |
| Heavy or difficult-to-move materials | Special relocation support after verification |

### Strategic Approach

Instead of paying cash for scrap stock, the RAP will provide:

- transport support;
- loading and offloading assistance;
- relocation logistics;
- secure storage space at the new site;
- compensation only for verified losses or damage caused during relocation.

This approach helps avoid inflated compensation claims, fraud risks, double counting, and disputes over ownership, while preserving PAPs' productive assets and business continuity.

## 9.5 Relocation to New Site

The relocation of Project Affected Persons (PAPs) to a designated alternative site is the central mitigation measure under this RAP and the primary mechanism for addressing economic displacement. Unlike conventional resettlement involving residential relocation, this project entails the relocation of a functioning informal economic cluster, particularly scrap dealers and associated workers, whose livelihoods depend on location-specific activities. In line with AfDB Operational Safeguard 5 (OS5), relocation must ensure that PAPs are not only physically moved but are also enabled to restore and preferably improve their livelihoods. Therefore, relocation under this RAP is conceived as a structured economic transition, supported by adequate planning, infrastructure, and institutional arrangements. Evidence from the field confirms that PAPs rely heavily on access to scrap materials, operational space, and trading networks, making it essential that the relocation site is designed to sustain these functions.

### 9.5.1 Relocation Principles

The relocation process will be guided by the following key principles:

- **Preparation before displacement**  
The relocation site will be fully prepared and operational before any displacement occurs. This includes basic infrastructure, site demarcation, and accessibility.
- **Participatory planning and allocation**  
PAPs will be actively involved in the planning, layout design, and allocation of plots at the new site to ensure fairness, transparency, and acceptability.
- **Livelihood continuity**  
The relocation site will be designed to support the continuation of scrap trading, dismantling, sorting, and related economic activities without significant disruption.

- **Access to markets and supply chains**  
The new site will be selected and planned to ensure reasonable proximity and connectivity to:
  - waste sources,
  - buyers and recyclers,
  - transport routes.
- **Equity and transparency in allocation**  
Allocation of plots and operational space will be based on verified census data, ensuring that all eligible PAPs receive fair and proportionate access.
- **Safety and environmental improvement**  
The relocation site will provide improved working conditions, including better organization, reduced hazards, and enhanced environmental management.

### 9.5.2 Relocation Support Package

To ensure a smooth and effective transition, PAPs will receive a comprehensive relocation support package (see Table 5.1 below) covering physical movement, site access, and re-establishment of economic activities.

**Table 51: Relocation Support**

| Support Type         | Description                                                                                               |
|----------------------|-----------------------------------------------------------------------------------------------------------|
| Transport assistance | Provision of trucks, loaders, and logistics support for moving scrap materials, equipment, and structures |
| Site allocation      | Allocation of designated plots or operational spaces based on verified PAP records                        |
| Basic infrastructure | Provision of access roads, drainage, site organization, security arrangements, and designated work zones  |
| Setup support        | Assistance to re-establish operations, including layout guidance and technical support                    |
| Transition period    | Defined period allowing PAPs to relocate and resume operations before full enforcement of site clearance  |

### 9.5.3 Relocation Process and Phasing

Relocation will be implemented in a phased and coordinated manner to minimize disruption:

1. **Preparation Phase**
  - Finalization of relocation site design and infrastructure
  - PAP consultations and plot allocation
  - Disclosure of relocation schedule
2. **Pre-Relocation Phase**
  - Verification of PAPs and assets
  - Issuance of relocation notices
  - Mobilization of transport and logistics
3. **Relocation Phase**

- Physical movement of scrap materials, equipment, and structures
  - On-site support at both origin and destination locations
- 4. Post-Relocation Phase**
- Confirmation of PAP settlement at new site
  - Support for re-establishing business operations
  - Monitoring and grievance handling

#### 9.5.4 Site Allocation Strategy

Allocation of space at the relocation site will be:

- based on PAP category and scale of operation;
- informed by census data and asset inventory;
- designed to maintain existing business relationships and clusters where feasible;
- structured to promote efficient layout and improved organization.

Priority will be given to:

- verified scrap dealers (primary PAP group);
- vulnerable PAPs;
- PAPs with larger operational requirements (based on verified need).

#### 9.5.5 Risks and Mitigation

The relocation of PAPs to a new site presents a range of operational, economic, and social risks that, if not properly managed, could undermine the effectiveness of the RAP and the livelihoods of affected persons. Given that the project involves the relocation of an established informal economic cluster, these risks are particularly significant and require proactive identification and mitigation. Consistent with AfDB Operational Safeguard 5 (OS5) and the findings of the ESIA, this RAP adopts a risk-based approach to relocation, ensuring that potential challenges are anticipated and addressed through targeted mitigation measures. The objective is to minimize disruption, maintain livelihood continuity, prevent conflict, and ensure that relocation is implemented in a fair, transparent, and participatory manner. The risks identified below are based on:

- field observations of existing site conditions;
- stakeholder consultations with PAPs and institutions;
- experience from similar relocation exercises involving informal economic activities.

Appropriate mitigation measures have been designed to ensure that relocation outcomes are socially acceptable, economically viable, and operationally feasible, while also being supported by the Grievance Redress Mechanism (GRM) for resolving any disputes that may arise.

**Table 52: Relocation Risks and Mitigation Measures**

| Risk                               | Mitigation Measure                                        |
|------------------------------------|-----------------------------------------------------------|
| Resistance to relocation           | Continuous stakeholder engagement and participation       |
| Loss of customers or suppliers     | Strategic site selection and market linkage support       |
| Damage to assets during relocation | Supervised transport and compensation for verified damage |
| Delays in site readiness           | Ensure site is fully prepared before displacement         |
| Conflict over site allocation      | Transparent allocation process and GRM support            |

## 9.6 Transitional Livelihood Support

Transitional livelihood support is a contingency measure under this RAP, designed to protect Project Affected Persons (PAPs) from income loss arising from delays in relocation. In line with AfDB Operational Safeguard 5 (OS5), PAPs must not bear the economic consequences of project implementation delays. The RAP is structured on the principle that relocation to a fully prepared alternative site will occur prior to displacement, thereby minimizing disruption. However, recognizing implementation risks, this section establishes a conditional (trigger-based) transitional support mechanism to ensure that PAPs are not adversely affected if relocation is not completed within the planned timeframe. Accordingly, transitional livelihood support will be activated only if relocation has not been completed within six (6) months from the agreed relocation commencement date. This approach ensures that:

- PAPs are protected against prolonged income disruption;
- the project maintains accountability for timely relocation;
- financial resources are used efficiently and only when necessary.

### Trigger Condition for Transitional Support

Transitional livelihood support shall be triggered under this condition: If relocation of eligible PAPs to the designated alternative site is not completed within six (6) months from the officially communicated relocation start date. Once triggered:

- support will apply to all eligible PAPs who remain unable to resume normal operations due to project-related delays;
- payments will continue until PAPs are fully relocated and able to re-establish their livelihoods.

**Table 53: Transitional Support (Conditional)**

| Support Type             | Description                                                                                                    |
|--------------------------|----------------------------------------------------------------------------------------------------------------|
| Cash allowance           | Temporary income support provided only after the 2-month trigger, to compensate for continued loss of earnings |
| Business restart support | Provision of tools, materials, and operational inputs if delays affect re-establishment of businesses          |
| Market linkage support   | Assistance to reconnect PAPs with buyers and supply chains once relocation is completed                        |

### 9.6.1 Implementation Approach

- Transitional support will be activated only upon confirmation of delay in relocation;

- The RAP implementation team (AMA/PCU) will verify:
  - relocation status;
  - PAP inability to operate due to project-related constraints;
- Cash allowances will be calculated based on average income levels established in the socio-economic survey;
- Payments will be time-bound and reviewed periodically until relocation is completed.

#### 9.6.2 Duration of Support

- Support will commence after the 2-month trigger period;
- It will continue until:
  - PAPs are relocated; and
  - PAPs are able to resume their economic activities at the new site;
- The duration will be monitored and adjusted based on actual relocation progress.

#### 9.6.3 Targeting and Prioritization

Priority will be given to:

- PAPs with high dependency on daily income (e.g., scrap dealers, informal workers);
- vulnerable groups, including women, youth, elderly persons, and PWDs;
- PAPs experiencing complete interruption of livelihood activities.

#### 9.6.4 Linkages with RAP Implementation

This conditional transitional support mechanism reinforces:

- Relocation accountability (Section 9.6);
- Entitlement Framework (Section 9.3);
- Livelihood Restoration Plan (Chapter 10).

It ensures that delays in project execution do not translate into uncompensated livelihood losses for PAPs.

By introducing a trigger-based transitional livelihood support mechanism, this RAP ensures that PAPs are protected against unforeseen delays in relocation while maintaining efficiency in resource use. This approach aligns with AfDB OS5 principles and strengthens the overall credibility and fairness of the resettlement process.

### 9.7 Key Risks and Mitigation

The compensation and relocation process may generate disputes or implementation risks if not managed transparently. Given that most PAPs operate within an informal scrap and recycling economy, risks may arise around valuation, eligibility, relocation timing, site allocation, and livelihood continuity. This RAP therefore applies a risk-based mitigation approach, supported by stakeholder engagement, clear documentation, and the GRM.

**Table 54: Compensation and Relocation Risks**

| Risk                                     | Mitigation                                                                                                                                                                |
|------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Refusal to relocate                      | Conduct continuous stakeholder engagement, involve PAPs in relocation-site planning, and provide adequate relocation support                                              |
| Livelihood disruption                    | Implement a strong Livelihood Restoration Plan (LRP), ensure business continuity support, and activate transitional support where relocation is delayed beyond six months |
| Vulnerable exclusion                     | Identify vulnerable PAPs early and provide targeted support, priority assistance, and follow-up monitoring                                                                |
| Conflict over relocation-site allocation | Use verified census data, clear allocation criteria, transparent plot assignment, and GRM support                                                                         |
| Damage to assets during movement         | Provide supervised transport, pre-move documentation, and compensation for verified project-related damage                                                                |
| Delays in compensation or relocation     | Ensure compensation and relocation arrangements are completed before displacement, with clear implementation timelines and accountability                                 |

These measures will help ensure that compensation and relocation are implemented fairly, transparently, and in line with AfDB OS5 requirements.

## 9.8 Link to Livelihood Restoration Plan (LRP)

The entitlement and compensation framework established in this chapter provides the foundation for the Livelihood Restoration Plan (LRP) presented in Chapter 10. While compensation and relocation address immediate losses, they are not sufficient on their own to ensure long-term recovery. In line with AfDB OS5, PAPs must be supported to restore, and where possible, improve, their income levels and livelihood conditions. The LRP therefore builds on this chapter by translating compensation and relocation commitments into practical livelihood restoration measures, including:

- re-establishment of businesses at the new site;
- support for market and buyer linkages;
- integration into the formal waste management system;
- skills development and employment support;
- targeted assistance for vulnerable PAPs.

Accordingly, this chapter should be read together with Chapter 10, because:

- relocation alone is not enough;
- compensation alone may not restore livelihoods;
- income streams must be rebuilt and sustained;
- vulnerable PAPs require additional support beyond standard entitlements.

This entitlement and compensation framework ensures that all eligible PAPs are:

- fairly compensated;
- properly relocated;

- economically supported;
- socially protected.

It provides a clear, transparent, and AfDB-compliant basis for managing project-related displacement and ensuring that affected persons are able to transition to the new site without being made worse off.

## 10. LIVELIHOOD RESTORATION PLAN (LRP)

This Livelihood Restoration Plan (LRP) sets out the measures required to restore, and where possible improve, the income levels and economic resilience of Project Affected Persons (PAPs). It builds directly on the eligibility, entitlement, compensation, and relocation framework presented in Chapter 9. The project will primarily result in economic displacement, affecting scrap dealers, waste pickers, informal workers, and support service providers whose livelihoods depend on the existing project site and associated waste value chains. The RAP confirms that these PAPs are mainly informal economic actors who require support beyond compensation, including relocation assistance, business re-establishment, and livelihood continuity measures.

In line with AfDB OS5, the LRP is designed to ensure that PAPs are not made worse off by the project and are supported to regain stable income after relocation.

### 10.1 Objectives of the LRP

The objectives of the LRP are to:

- restore PAPs' income and livelihood activities after relocation;
- support business continuity at the new site;
- reduce income disruption during the relocation process;
- integrate affected informal actors into a more organized waste and recycling system;
- provide targeted support to vulnerable PAPs;
- monitor livelihood outcomes until restoration is achieved.

### 10.2 Livelihood Restoration Strategy

The LRP adopts a relocation-led livelihood restoration strategy. Since PAPs are expected to move to a new site, the main approach is to ensure that the new location is not only available but also economically functional. The strategy indicated in the table below.

**Table 55: Restoration Area and Approach**

| Restoration Area               | Approach                                                                   |
|--------------------------------|----------------------------------------------------------------------------|
| Business continuity            | Relocation of scrap materials, tools, and equipment to the new site        |
| Site-based livelihood recovery | Allocation of operational spaces at the new site                           |
| Income restoration             | Support to restart trading, sorting, dismantling, and recycling activities |
| Market access                  | Reconnection to buyers, suppliers, and transport networks                  |
| Vulnerability support          | Additional assistance for women, youth, elderly persons, and PWDs          |

| Restoration Area | Approach                                                                   |
|------------------|----------------------------------------------------------------------------|
| Formalization    | Support for registration, cooperatives, and integration into waste systems |

### 10.3 Livelihood Restoration Measures

This section outlines the specific livelihood restoration measures that will be implemented to address the impacts identified in Chapter 7 and the PAP profiles established in Chapter 8. The measures are designed to translate the compensation and relocation provisions of Chapter 9 into practical, income-restoring actions tailored to the different categories of PAPs affected by the project. Consistent with AfDB Operational Safeguard 5 (OS5), livelihood restoration is not limited to financial compensation but requires targeted support that enables PAPs to resume and sustain their economic activities following displacement. Given that the ESIA confirms that the majority of PAPs depend on site-based, informal, and daily income-generating activities, the restoration approach focuses on business continuity, re-establishment at the relocation site, and reintegration into functional market and waste value chains. The measures presented below are therefore:

- category-specific, reflecting the different roles within the scrap and waste economy;
- location-sensitive, recognizing dependence on access to operational space and materials;
- practical and implementable, aligned with relocation arrangements;
- linked to the broader project system, including waste management and recycling operations.

Together, these measures ensure that PAPs are supported to restore their livelihoods in a timely manner, minimize income disruption, and transition into a more organized and sustainable economic environment at the new site.

**Table 56: Livelihood Restoration Measures**

| PAP Category             | Livelihood Impact                             | Restoration Measure                                                         |
|--------------------------|-----------------------------------------------|-----------------------------------------------------------------------------|
| Scrap dealers            | Loss of business location and operating space | Allocation of serviced space at new site; relocation of stock and equipment |
| Waste pickers            | Loss of access to waste streams               | Integration into source separation, collection, or sorting systems          |
| Informal workers         | Loss of employment or daily income            | Skills training, job placement, and employment linkages                     |
| Traders/support services | Reduced customer base                         | Business restart support and access to trading space                        |

### 10.4 Business Re-Establishment Support

PAPs will be supported to restart their operations at the relocation site through:

- demarcated operational spaces;
- transport of scrap materials, tools, and equipment;
- support for setting up sheds, kiosks, and storage areas;

- basic site organization to allow safe movement and trading;
- assistance to reconnect with buyers and suppliers.

This is especially important because scrap materials are not waste under this RAP; they are business stock, working capital, and income-generating assets.

## 10.5 Integration into Formal Waste and Recycling System

The LRP will support the gradual integration of PAPs into the formalized waste management and recycling system. Possible integration measures include:

- formation or strengthening of scrap dealer and waste picker cooperatives;
- registration of PAPs or groups with AMA-supported waste systems;
- allocation of specific roles in sorting, aggregation, recycling, or collection;
- linkages with formal service providers and recycling companies;
- training on occupational health and safety, waste handling, and basic business management.

## 10.6 Transitional Support

Transitional livelihood support will be linked to the relocation process. As agreed in Chapter 9, transitional support will be triggered only if relocation is not completed within six months from the officially communicated relocation commencement date. Once triggered, support may include:

| Support Type             | Description                                                             |
|--------------------------|-------------------------------------------------------------------------|
| Cash allowance           | Temporary income support for eligible PAPs affected by relocation delay |
| Business restart support | Tools, materials, or operational inputs to resume work                  |
| Market linkage support   | Assistance to reconnect with buyers and suppliers                       |

## 10.7 Support for Vulnerable PAPs

The census and socio-economic survey identified few PAPs requiring classification as vulnerable under this RAP. In line with AfDB OS5 and good resettlement practice, the RAP will retain a contingency screening mechanism to ensure that any vulnerability identified during relocation, livelihood restoration, or grievance handling is appropriately addressed.

### 10.7.1 Vulnerability Screening During Implementation

Although no vulnerable PAPs were identified at the census stage, the RAP implementation team will continue to screen for vulnerability during:

- relocation planning;
- compensation verification;
- livelihood restoration monitoring;
- grievance resolution;

- post-relocation follow-up.

### 10.7.2 Contingency Assistance

Where vulnerability is later confirmed, support may include:

| Potential Vulnerability Issue                      | Possible Support Measure               |
|----------------------------------------------------|----------------------------------------|
| Temporary incapacity to relocate assets            | Assisted relocation support            |
| Loss of income beyond expected transition period   | Additional livelihood follow-up        |
| Disability or mobility constraint identified later | Accessible relocation arrangements     |
| Severe income hardship after relocation            | Referral to AMA/Social Welfare support |
| Exclusion from livelihood restoration activities   | Corrective inclusion through RAP team  |

## **11. IMPLEMENTATION ARRANGEMENTS**

This chapter outlines the institutional, administrative, and operational arrangements for implementing the Resettlement Action Plan (RAP) and Livelihood Restoration Plan (LRP). Effective implementation is critical to ensuring that compensation, relocation, and livelihood restoration measures are delivered in a timely, transparent, and coordinated manner, consistent with AfDB Operational Safeguard 5 (OS5). Given the project involves the relocation of an informal economic cluster, implementation must go beyond standard procedures and ensure strong coordination between institutions, continuous stakeholder engagement, and close monitoring of livelihood outcomes.

### **11.1 Implementation Approach**

RAP implementation will follow a phased and structured approach, aligned with the project lifecycle:

- 1. Preparation Phase**
  - Finalization of RAP and disclosure
  - Institutional setup and capacity assignment
  - Preparation of relocation site
  - Verification of PAPs and assets
- 2. Compensation and Pre-Relocation Phase**
  - Agreement on entitlements
  - Allocation of relocation plots
  - Mobilization of logistics
- 3. Relocation Phase**
  - Movement of PAPs, structures, and materials
  - On-site relocation support
  - Initial setup at new site
- 4. Post-Relocation and Livelihood Restoration Phase**
  - Business re-establishment
  - Livelihood restoration support
  - Monitoring and grievance handling

### **11.2 Institutional Arrangements**

Implementation of the RAP/LRP will require coordinated action among several institutions with responsibilities for project execution, resettlement planning, compensation, relocation, livelihood restoration, environmental and social compliance, grievance management, and monitoring. Because the project involves the relocation of an informal economic cluster, institutional arrangements must be clear, practical, and accountable. Each institution must understand its role, decision-making authority, reporting obligation, and contribution to ensuring that PAPs are compensated, relocated, and supported in line with AfDB OS5. The institutional arrangement is therefore structured around four levels:

- Lead implementation and coordination by AMA and the PCU;

- Technical support from valuation, safeguards, social welfare, and environmental institutions;
- Operational support from contractors and service providers;
- Community-level participation through PAP representatives and grievance committees.

**Table 57: Institutional Responsibilities for RAP/LRP Implementation**

| <b>Institution / Actor</b>                      | <b>Key Role</b>                 | <b>Specific Responsibilities</b>                                                                                                                               |
|-------------------------------------------------|---------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Accra Metropolitan Assembly (AMA)</b>        | Lead implementing agency        | Overall responsibility for RAP/LRP implementation; approve relocation arrangements; coordinate compensation, relocation, stakeholder engagement, and reporting |
| <b>Project Coordination Unit (PCU)</b>          | Day-to-day coordination         | Manage RAP implementation schedule; coordinate institutions; supervise compensation and relocation; maintain records; prepare progress reports                 |
| <b>RAP Implementation Team</b>                  | Field implementation            | Verify PAPs and assets; support compensation agreements; coordinate movement to the new site; monitor PAP re-establishment                                     |
| <b>Lands Commission / Valuation Support</b>     | Technical valuation support     | Advise on valuation of affected structures, improvements, and relevant assets; support replacement cost assessment                                             |
| <b>Environmental Protection Authority (EPA)</b> | Regulatory oversight            | Monitor ESIA/RAP compliance; ensure social mitigation commitments are implemented; participate in safeguards oversight                                         |
| <b>Social Welfare Department</b>                | Social support                  | Support any PAP who may require additional assistance during implementation, especially if vulnerability emerges                                               |
| <b>Contractors / Service Providers</b>          | Operational support             | Prepare relocation site infrastructure; support transport logistics; provide labour, equipment, and site preparation services                                  |
| <b>PAP Representatives / Associations</b>       | PAP coordination                | Validate PAP lists; support communication with affected persons; assist in relocation scheduling and conflict prevention                                       |
| <b>GRM Committees</b>                           | Complaint resolution            | Receive, document, investigate, and resolve grievances related to eligibility, compensation, relocation, and livelihood restoration                            |
| <b>AfDB / Development Partners</b>              | Oversight and compliance review | Review RAP implementation progress; ensure compliance with OS5; provide guidance where corrective action is required                                           |

### Coordination Mechanism

AMA, through the PCU, will convene regular coordination meetings during RAP implementation. These meetings will review progress on compensation, relocation-site readiness, PAP engagement, grievance resolution, and livelihood restoration. The PCU will serve as the central reporting point and will ensure that all institutions act in accordance with the agreed RAP implementation schedule.

### Accountability Principle

No displacement or site clearance should occur until the required compensation, relocation-site preparation, and relocation support measures are in place. This ensures that institutional action remains consistent with AfDB OS5 and protects PAPs from avoidable livelihood disruption.

## 11.3 Project Coordination Unit (PCU)

A dedicated Project Coordination Unit (PCU) will be established within the implementing agency to serve as the central coordinating body for the implementation of the Resettlement Action Plan (RAP) and Livelihood Restoration Plan (LRP). The PCU will ensure that all resettlement-related activities are executed in a timely, coordinated, transparent, and compliant manner, in line with AfDB Operational Safeguard 5 (OS5), national regulatory requirements, and the commitments outlined in this RAP. Given the complexity of relocating an informal economic cluster and restoring livelihoods, the PCU will play a critical role in bridging policy, planning, and field-level implementation, ensuring that institutional responsibilities are effectively aligned and that PAPs receive their entitlements without delay.

### Structure and Composition of the PCU

The PCU will be staffed with a multidisciplinary team to address the technical, social, and operational aspects of RAP implementation.

**Table 58: Proposed PCU Composition**

| Position                              | Key Role                                                |
|---------------------------------------|---------------------------------------------------------|
| PCU Coordinator                       | Overall leadership, coordination, and reporting         |
| Social Safeguards Specialist          | RAP/LRP implementation and compliance oversight         |
| Community Liaison Officer             | Stakeholder engagement and communication                |
| Livelihood Restoration Specialist     | Design and monitoring of livelihood support measures    |
| Monitoring & Evaluation (M&E) Officer | Tracking progress, indicators, and reporting            |
| GRM Officer                           | Grievance intake, tracking, and resolution coordination |
| Administrative/Finance Officer        | Budget management and documentation                     |

## **Key Functions of the PCU**

The PCU will be responsible for the overall planning, coordination, and supervision of RAP implementation. Its key functions include:

- **Coordination of RAP and LRP Activities**  
Coordinate all activities related to compensation, relocation, and livelihood restoration, ensuring alignment between different institutions and implementation phases.
- **Compliance Assurance**  
Ensure full compliance with AfDB OS5, ESIA commitments, and national legal requirements, including adherence to agreed procedures and safeguards.
- **Supervision of Compensation and Relocation**  
Oversee verification of PAPs, compensation delivery, relocation logistics, and site allocation to ensure fairness, transparency, and timeliness.
- **Stakeholder Engagement and Communication**  
Manage communication with PAPs, community representatives, and institutions; ensure continuous engagement and information disclosure.
- **Grievance Redress Mechanism (GRM) Oversight**  
Supervise GRM operations, ensure grievances are addressed promptly, and maintain records of complaints and resolutions.
- **Monitoring and Evaluation**  
Track implementation progress, assess livelihood restoration outcomes, and ensure corrective actions are taken where necessary.
- **Reporting and Documentation**  
Prepare periodic progress reports, including compensation status, relocation progress, livelihood restoration outcomes, and grievance resolution, for submission to relevant stakeholders and financiers.

## **Operational Procedures**

To ensure effective implementation, the PCU will:

- develop a detailed RAP implementation workplan aligned with the project schedule;
- establish standard operating procedures (SOPs) for compensation, relocation, and documentation;
- maintain a centralized database of PAPs, assets, and entitlements;
- coordinate closely with contractors and service providers for relocation logistics;
- ensure that all activities are properly documented and auditable.

## **Coordination and Reporting Lines**

The PCU will report to the implementing agency (AMA) and will serve as the main interface between:

- implementing institutions;
- PAPs and community stakeholders;
- regulatory authorities;
- financing partners.

Regular coordination meetings will be held to review progress, address challenges, and ensure alignment across all actors.

## **Accountability and Compliance**

The PCU will ensure that:

- no displacement occurs before compensation and relocation arrangements are completed;
- PAPs receive their entitlements in accordance with this RAP;
- any delays or challenges are promptly addressed;
- corrective actions are implemented where required.

The establishment of a dedicated PCU provides a structured and accountable mechanism for implementing the RAP and LRP. By centralizing coordination, strengthening oversight, and ensuring continuous engagement, the PCU will play a pivotal role in delivering a smooth, compliant, and socially responsible resettlement process.

### **11.4 RAP Implementation Team**

The RAP Implementation Team will operate under the supervision of the Project Coordination Unit (PCU) and will be responsible for the field-level execution of all resettlement, compensation, relocation, and livelihood restoration activities. While the PCU provides overall coordination and oversight, the RAP Implementation Team ensures that agreed RAP commitments are translated into practical actions on the ground. Given that the project involves relocation of PAPs from an active informal scrap and waste-related economic site to a new location, the team must be technically competent, community-facing, and able to manage sensitive issues relating to eligibility, asset verification, compensation, relocation logistics, and grievances.

#### **Key Responsibilities**

The RAP Implementation Team will be responsible for:

- **Verification of PAPs and assets**  
Confirm PAP identities, affected assets, business spaces, structures, stock, and livelihood activities against the approved census and asset inventory.
- **Facilitation of compensation agreements and payments**  
Support the preparation, explanation, signing, and documentation of compensation agreements, ensuring that PAPs understand their entitlements before payment or relocation.
- **Coordination of relocation logistics**  
Organize the movement of scrap materials, equipment, tools, containers, sheds, and other business assets to the new site.
- **Support during site transition**  
Assist PAPs to settle at the relocation site, including plot allocation, re-establishment of operations, and resolution of practical transition challenges.
- **Record keeping and documentation**  
Maintain accurate files on PAP verification, compensation payments, relocation support, attendance records, consultation minutes, asset transfer notes, and grievance outcomes.

- **Support to grievance resolution**

Work with the GRM structures to investigate and resolve complaints related to eligibility, valuation, compensation, site allocation, relocation delays, or damage to assets.

**Table 59: RAP Implementation Team Roles**

| <b>Role / Function</b>                 | <b>Main Responsibility</b>                                    |
|----------------------------------------|---------------------------------------------------------------|
| RAP Field Coordinator                  | Leads field implementation and reports to the PCU             |
| Social Safeguards Officer              | Ensures OS5 compliance and PAP protection                     |
| Valuation / Asset Verification Officer | Confirms assets and supports compensation documentation       |
| Community Liaison Officer              | Maintains communication with PAPs and associations            |
| Relocation Logistics Officer           | Coordinates transport, loading, movement, and site allocation |
| Documentation Officer                  | Maintains PAP files, agreements, and implementation records   |
| GRM Focal Person                       | Supports grievance intake, investigation, and resolution      |

### **Operational Requirement**

The RAP Implementation Team must be mobilized before any physical relocation or site clearance begins. This is to ensure that PAP verification, compensation arrangements, relocation-site readiness, and grievance procedures are in place before displacement occurs.

In conclusion, the RAP Implementation Team will serve as the project’s main field implementation arm, ensuring that RAP activities are delivered in a practical, fair, transparent, and well-documented manner.

### **11.5 Capacity Requirements**

Effective RAP/LRP implementation requires adequate institutional, technical, and operational capacity. Given the nature of this project, which involves relocation of an informal economic cluster and restoration of site-based livelihoods, implementation staff must have the skills to manage both technical safeguards requirements and sensitive community-level processes.

The capacity requirements are intended to ensure that compensation, relocation, livelihood restoration, grievance handling, and monitoring are implemented in a transparent, timely, and AfDB-compliant manner.

**Table 60: Key Capacity Areas**

| Capacity Area                         | Required Competence                                                                          | Purpose                                               |
|---------------------------------------|----------------------------------------------------------------------------------------------|-------------------------------------------------------|
| Social safeguards expertise           | Knowledge of AfDB OS5, RAP implementation, economic displacement, and livelihood restoration | Ensure compliance with safeguard requirements         |
| Community engagement and facilitation | Ability to communicate with PAPs, associations, local leaders, and institutions              | Support trust-building, disclosure, and participation |
| Valuation and compensation expertise  | Skills in asset verification, replacement cost valuation, and compensation documentation     | Ensure fair and transparent compensation              |
| Logistics and relocation planning     | Ability to plan transport, site allocation, movement of materials, and relocation sequencing | Minimize disruption during relocation                 |
| Monitoring and reporting systems      | Ability to track indicators, grievances, compensation, relocation, and livelihood outcomes   | Ensure accountability and corrective action           |

### **Capacity-Building Measures**

Where gaps are identified, the following measures will be implemented:

- orientation on AfDB OS5 and RAP/LRP commitments;
- training on compensation procedures and documentation;
- training on stakeholder engagement and grievance handling;
- practical briefing on relocation logistics and site transition;
- training on monitoring indicators, reporting templates, and record keeping.

In conclusion, adequate capacity is essential to ensure that RAP implementation is not reduced to a payment exercise, but functions as a structured process for fair compensation, orderly relocation, livelihood restoration, and social risk management.

## **11.6 Implementation Schedule**

The implementation schedule for the RAP/LRP is designed to ensure that all resettlement activities are carried out in a logical, sequential, and time-bound manner, consistent with AfDB Operational Safeguard 5 (OS5) and project implementation requirements. The schedule aligns RAP activities with the overall project timeline while ensuring that key safeguard principles are respected, particularly:

- no displacement before compensation and relocation arrangements are completed;
- relocation site readiness prior to movement of PAPs;
- continuous livelihood restoration support following relocation;
- ongoing monitoring and grievance management throughout implementation.

The schedule reflects a phased approach, beginning with disclosure and verification, followed by compensation and site preparation, then relocation, and finally livelihood restoration and monitoring. Flexibility is built into the schedule to accommodate field realities, but the sequence of critical actions must be maintained to ensure compliance and effectiveness.

**Table 61: Indicative Implementation Schedule**

| Activity                       | Timeline/ Dates           | Key Notes                                                             |
|--------------------------------|---------------------------|-----------------------------------------------------------------------|
| RAP disclosure and approval    | Month 1/ June 2026        | RAP shared with stakeholders; approval obtained before implementation |
| PAP verification and agreement | Month 1-2 / June 2026     | Final confirmation of PAPs, assets, and signed relocation agreements  |
| Relocation site preparation    | Month 4-7 / Sept-Dec 2026 | Site must be ready prior to PAP movement                              |
| Relocation of PAPs             | Month 8 / January 2027    | Coordinated movement of PAPs, structures, and materials               |
| Monitoring and evaluation      | Continuous                | Ongoing tracking of compensation, relocation, and livelihood outcomes |

### **Critical Sequencing Principle**

The following sequence is mandatory:

1. RAP disclosure and approval
2. PAP verification and agreement
3. Compensation payment
4. Relocation site preparation
5. Relocation of PAPs
6. Livelihood restoration support

This ensures that PAPs are not exposed to premature displacement or income loss.

### **Link to Transitional Support Trigger**

As established in Section 9.7:

- If relocation is not completed within six (6) months from the official relocation start date,
- Transitional livelihood support will be activated.

This reinforces the importance of adhering to the schedule and ensures that delays do not negatively affect PAP livelihoods.

In conclusion, the implementation schedule provides a clear roadmap for RAP execution, ensuring that activities are carried out in the correct order, within defined timelines, and with appropriate safeguards in place. It supports efficient coordination, minimizes disruption to PAPs, and ensures compliance with AfDB OS5 requirements.

### 11.7 Linkages with Other RAP Components

The implementation arrangements do not operate as a standalone administrative process. They provide the coordination framework through which the key RAP commitments on compensation, relocation, livelihood restoration, grievance management, monitoring, and reporting are delivered. Effective RAP implementation therefore requires strong integration between the institutional arrangements in this chapter and the core operational chapters of the RAP.

**Table 62: Key Linkages with Other RAP Components**

| <b>RAP Component</b>                                                | <b>Linkage to Implementation Arrangements</b>                                                                                                                      |
|---------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Chapter 9: Entitlements and Compensation</b>                     | The implementation team ensures PAPs receive approved entitlements, compensation, relocation support, and site allocation before displacement.                     |
| <b>Chapter 10: Livelihood Restoration Plan</b>                      | The PCU and RAP Implementation Team coordinate livelihood restoration measures, business re-establishment, market linkage support, and post-relocation monitoring. |
| <b>Chapter 6: Grievance Redress Mechanism</b>                       | GRM structures support resolution of disputes on eligibility, valuation, compensation, relocation, site allocation, and livelihood restoration.                    |
| <b>Chapter 8: Census, Asset Inventory and Socio-Economic Survey</b> | Provides the verified PAP database and asset records used for compensation, relocation planning, and monitoring.                                                   |
| <b>Chapter 12/Monitoring Chapter</b>                                | Implementation progress, livelihood outcomes, grievances, and compliance are tracked and reported.                                                                 |

#### **Integrated Implementation Requirement**

These components must be implemented in an integrated manner to ensure that:

- compensation is completed before displacement;
- relocation site preparation is completed before PAP movement;
- livelihood restoration begins immediately after relocation;
- grievances are addressed promptly throughout implementation;
- monitoring confirms whether PAPs have restored their income and operations.

In conclusion, the effectiveness of this RAP depends on the close coordination of compensation, relocation, livelihood restoration, and grievance management. The institutional arrangements in this chapter provide the mechanism for ensuring that all these components work together to achieve AfDB OS5 compliance and successful livelihood restoration.

## 11.8 Reporting and Documentation

Robust reporting and documentation are essential to ensure **transparency, accountability, and compliance** with AfDB Operational Safeguard 5 (OS5) and national requirements. Given the nature of this RAP—which involves compensation, relocation, and livelihood restoration of informal economic actors—accurate records and timely reporting are critical for:

- verifying that PAPs receive their full entitlements;
- tracking relocation progress and outcomes;
- assessing effectiveness of livelihood restoration measures;
- managing and resolving grievances;
- demonstrating compliance to regulators and financing partners.

The Project Coordination Unit (PCU) will establish and maintain a **centralized documentation and reporting system** to capture all RAP-related activities.

The PCU will maintain comprehensive and auditable records as indicated in table below:

**Table 63: Key Documentation Requirements**

| Documentation Type              | Description                                                           |
|---------------------------------|-----------------------------------------------------------------------|
| PAP database                    | Verified list of PAPs, asset inventory, entitlement records           |
| Relocation tracking             | Records of PAP movement, site allocation, and settlement confirmation |
| Livelihood restoration progress | Status of business re-establishment, support provided, and outcomes   |
| Grievance logs                  | Register of complaints, actions taken, and resolution status          |
| Consultation records            | Minutes of meetings, attendance lists, and disclosure materials       |
| Monitoring reports              | Periodic assessments of RAP implementation performance                |

### Reporting Requirements

The PCU will prepare periodic reports to track progress and inform stakeholders.

**Table 64: RAP Reporting Framework**

| Report Type                        | Frequency           | Content                                                            |
|------------------------------------|---------------------|--------------------------------------------------------------------|
| RAP Implementation Progress Report | Monthly / Quarterly | Compensation status, relocation progress, issues encountered       |
| Livelihood Restoration Report      | Quarterly           | PAP income restoration status, business recovery, support measures |
| GRM Report                         | Monthly             | Number of grievances received, resolved, pending                   |
| Monitoring & Evaluation Report     | Quarterly / Annual  | Performance indicators, compliance status, corrective actions      |
| Completion Report                  | End of RAP          | Summary of implementation, outcomes, lessons learned               |

**Information Disclosure**

Reports and relevant information will be shared with:

- Project stakeholders, including PAP representatives;
- Accra Metropolitan Assembly (AMA);
- Regulatory authorities;
- Financing partners (including AfDB);

Where appropriate, summaries will be disclosed in formats accessible to PAPs to ensure transparency.

**Data Management and Confidentiality**

- All PAP data will be securely stored and managed;
- Personal information will be handled with confidentiality;
- Access to records will be controlled but available for audit and verification purposes.

In conclusion, the implementation arrangements outlined in this chapter provide a clear institutional and operational framework for delivering the RAP and LRP. By ensuring strong coordination, defined responsibilities, proper documentation, and phased execution, the project will be able to manage displacement impacts effectively and support PAPs in restoring their livelihoods in a structured and sustainable manner.

## 12. MONITORING, EVALUATION AND COMPLETION AUDIT

Monitoring and evaluation (M&E) are essential to ensure that the Resettlement Action Plan (RAP) and Livelihood Restoration Plan (LRP) are implemented effectively, transparently, and in full compliance with AfDB Operational Safeguard 5 (OS5). This chapter establishes the framework for tracking progress, assessing outcomes, identifying gaps, and implementing corrective actions where necessary. Given that the project involves economic displacement and relocation of informal livelihood systems, monitoring will focus not only on process compliance (e.g., compensation and relocation) but also on outcome-based indicators, particularly the restoration of livelihoods and income levels.

### Objectives of Monitoring and Evaluation

The objectives of RAP monitoring and evaluation are to:

- ensure that compensation, relocation, and livelihood restoration measures are implemented as planned;
- verify that PAPs receive their full entitlements;
- assess whether livelihoods have been restored or improved;
- identify implementation challenges and apply corrective actions;
- ensure compliance with AfDB OS5 and national requirements;
- provide evidence for reporting to stakeholders and financiers.

### 12.1 Monitoring Approach

Monitoring will be undertaken through a structured, two-tier system to ensure that RAP and LRP implementation is both process-compliant and outcome-oriented. Given the nature of the project, economic displacement and relocation of informal livelihood systems, monitoring will focus not only on whether activities are completed, but also on whether PAPs are able to resume and sustain their livelihoods. The monitoring approach combines continuous internal oversight with the option of independent external verification, ensuring transparency, accountability, and alignment with AfDB Operational Safeguard 5 (OS5).

#### 12.1.1 Internal Monitoring

Internal monitoring will be conducted by the Project Coordination Unit (PCU) and the RAP Implementation Team on a continuous basis throughout all phases of implementation.

Internal monitoring is the primary mechanism for:

- tracking day-to-day progress;
- identifying implementation gaps early;
- ensuring timely corrective actions;
- maintaining complete and auditable records.

#### Key Focus Areas

| Monitoring Area       | Key Focus                                                                       |
|-----------------------|---------------------------------------------------------------------------------|
| Compensation delivery | Verification that all eligible PAPs receive full entitlements before relocation |
| Relocation progress   | Tracking movement of PAPs, allocation of plots, and settlement at new site      |

| Monitoring Area        | Key Focus                                                                            |
|------------------------|--------------------------------------------------------------------------------------|
| GRM functioning        | Number of grievances received, resolved, and pending; timeliness of resolution       |
| Livelihood restoration | Progress in business re-establishment and resumption of income-generating activities |
| Stakeholder engagement | Frequency, quality, and outcomes of consultations and communication                  |

### Implementation Modality

Internal monitoring will include:

- regular field visits and site inspections;
- verification of PAP status and relocation progress;
- review of compensation and relocation records;
- tracking of livelihood restoration indicators;
- updating centralized RAP databases;
- periodic internal review meetings.

Monitoring results will be documented and integrated into monthly and quarterly progress reports.

#### 12.1.2 External Monitoring

Where required by the financing partner or based on the scale and complexity of the project, independent external monitoring may be undertaken by a qualified third party. External monitoring serves as an objective validation mechanism, providing assurance that RAP implementation meets required standards and that reported outcomes are accurate.

#### Scope of External Monitoring

| Monitoring Area                 | Purpose                                                                    |
|---------------------------------|----------------------------------------------------------------------------|
| RAP implementation progress     | Independent verification of reported activities and milestones             |
| Compliance with AfDB OS5        | Assessment of adherence to safeguard principles and requirements           |
| Livelihood restoration outcomes | Validation of whether PAP incomes and livelihoods are restored or improved |
| Grievance handling              | Review of effectiveness, fairness, and accessibility of the GRM            |
| Stakeholder engagement          | Assessment of inclusiveness and adequacy of consultations                  |

#### Outputs of External Monitoring

External monitoring will typically produce:

- periodic independent monitoring reports;
- verification of key RAP indicators;
- identification of gaps and risks;
- recommendations for corrective actions.

In conclusion, the dual monitoring approach ensures that RAP implementation is continuously tracked, independently verified where necessary, and responsive to emerging issues. This strengthens accountability, supports adaptive management, and ensures that the core objective of the RAP, restoration of livelihoods without adverse impact on PAPs, is achieved.

## 12.2 Monitoring Indicators

Monitoring indicators provide a structured basis for assessing whether RAP and LRP implementation is achieving its intended objectives. These indicators are aligned with AfDB OS5 requirements and are designed to measure both:

- process performance (e.g., compensation delivery, relocation completion); and
- outcome performance (e.g., livelihood and income restoration).

Given the project involves economic displacement and relocation of informal livelihoods, particular emphasis is placed on indicators that track livelihood recovery, income stability, and PAP satisfaction, in addition to compliance-related metrics. All indicators will be monitored by the PCU and RAP Implementation Team and reported periodically. Where targets are not met, corrective actions will be triggered.

**Table 65: Key Monitoring Indicators**

| Area                   | Indicator                                    | Target               | Means of Verification                                        | Frequency                         |
|------------------------|----------------------------------------------|----------------------|--------------------------------------------------------------|-----------------------------------|
| Compensation           | % of PAPs compensated before relocation      | 100%                 | Payment records, signed agreements, receipts                 | Monthly during compensation phase |
| Relocation             | % of PAPs relocated to new site              | 100%                 | Relocation logs, site allocation records                     | Monthly during relocation         |
| Livelihood Restoration | % of PAPs able to resume economic activities | ≥ 90%                | Field verification, PAP interviews, business activity checks | Quarterly                         |
| Income Restoration     | PAP income levels compared to baseline       | Restored or improved | Socio-economic follow-up surveys, PAP interviews             | Quarterly / Bi-annual             |
| GRM                    | % of grievances resolved                     | ≥ 90%                | GRM logs, resolution records                                 | Monthly                           |
| Stakeholder Engagement | Number of consultations conducted            | As planned           | Meeting minutes, attendance sheets                           | Monthly / Quarterly               |
| Documentation          | Completeness of RAP records                  | 100%                 | RAP database, audit checks                                   | Quarterly                         |

### 12.2.1 Indicator Application

- Indicators will be tracked against baseline data from the census and socio-economic survey (Chapter 8);
- Results will be used to assess whether PAPs are not worse off and have restored their livelihoods;
- Any shortfall in performance will trigger corrective measures under Section 12.7;
- Indicators will also inform reporting to stakeholders and financing partners.

In conclusion, the monitoring indicators provide a clear and measurable framework for evaluating RAP performance. By combining compliance indicators with livelihood outcome indicators, the project ensures that success is not only measured by completion of activities but by the actual recovery and stability of PAP livelihoods.

### 12.3 Data Collection Methods

Reliable data collection is essential for effective monitoring and evaluation of RAP and LRP implementation. Given the project involves relocation and livelihood restoration of informal economic actors, data must be accurate, timely, verifiable, and field-based to reflect actual conditions on the ground. Data collection will combine quantitative methods (e.g., records, indicators, surveys) and qualitative methods (e.g., interviews, consultations, observations) to ensure a comprehensive understanding of implementation progress and outcomes. All data collected will be used to track performance against the monitoring indicators defined in Section 12.2 and to inform corrective actions where necessary.

**Table 66: Key Data Collection Methods**

| Method                                        | Description                                                                                    | Purpose                                                              | Frequency        |
|-----------------------------------------------|------------------------------------------------------------------------------------------------|----------------------------------------------------------------------|------------------|
| Field visits and site inspections             | Regular visits to both original and relocation sites to observe progress and verify conditions | Confirm relocation status, site usage, and business re-establishment | Weekly / Monthly |
| PAP interviews and follow-up surveys          | Structured and semi-structured interviews with PAPs after relocation                           | Assess livelihood restoration, income levels, and satisfaction       | Quarterly        |
| Review of compensation and relocation records | Examination of payment records, agreements, relocation logs, and asset registers               | Verify that entitlements have been delivered correctly               | Monthly          |
| GRM logs and reports                          | Analysis of grievance records, resolution status, and response times                           | Monitor effectiveness of grievance handling                          | Monthly          |

| Method                           | Description                                                                | Purpose                                   | Frequency           |
|----------------------------------|----------------------------------------------------------------------------|-------------------------------------------|---------------------|
| Consultation and meeting records | Documentation of stakeholder meetings, attendance lists, and issues raised | Track stakeholder engagement and feedback | Monthly / Quarterly |

### Data Quality Assurance

To ensure data reliability and credibility:

- all data will be cross-verified across multiple sources (e.g., field observations vs records);
- standardized templates and tools will be used for data collection;
- data will be reviewed by the PCU before reporting;
- discrepancies will be investigated and corrected promptly.

### Data Management

- A centralized RAP database will be maintained by the PCU;
- Data will be updated regularly and securely stored;
- Access will be controlled to ensure confidentiality while allowing audit and verification;
- Data will be used for reporting, decision-making, and compliance verification.

In conclusion, the use of multiple data collection methods ensures that monitoring is comprehensive, accurate, and reflective of actual implementation outcomes. This strengthens accountability, supports adaptive management, and ensures that RAP objectives, particularly livelihood restoration, are effectively achieved

## 12.4 Reporting

Reporting is essential for ensuring transparency, accountability, and adaptive management during RAP and LRP implementation. Monitoring results will be documented and reported in accordance with the reporting framework outlined in Chapter 11. The purpose of reporting is to ensure that AMA, the PCU, PAP representatives, regulatory authorities, and financing partners are regularly informed about implementation progress, emerging risks, and corrective actions.

## Reporting Content

Reports will include:

| Reporting Area               | Content to be Reported                                                     |
|------------------------------|----------------------------------------------------------------------------|
| Implementation progress      | Progress against approved RAP implementation schedule                      |
| Agreements                   | Status of relocation agreements and outstanding cases                      |
| Relocation                   | Status of relocation site preparation, PAP movement, and site allocation   |
| Livelihood restoration       | Business re-establishment, income recovery, and support measures delivered |
| GRM                          | Grievances received, resolved, pending, and escalated                      |
| Stakeholder engagement       | Consultations held, issues raised, and commitments made                    |
| Risks and corrective actions | Implementation challenges, mitigation measures, and follow-up actions      |

## Reporting Frequency

| Report Type                    | Frequency                 | Responsible Entity                     |
|--------------------------------|---------------------------|----------------------------------------|
| Internal implementation update | Monthly                   | PCU / RAP Implementation Team          |
| GRM summary report             | Monthly                   | GRM Officer / PCU                      |
| RAP progress report            | Quarterly                 | PCU                                    |
| Livelihood restoration report  | Quarterly                 | PCU / LRP Team                         |
| Completion report              | End of RAP implementation | PCU / Independent reviewer if required |

## Use of Reports

Reports will be used to:

- track compliance with RAP commitments;
- inform management decisions;
- identify delays or implementation gaps;
- trigger corrective actions;
- support AfDB review and completion audit.

In conclusion, the reporting system will ensure that RAP implementation remains transparent, evidence-based, and responsive to emerging issues. Regular reporting will also provide the documentation required to demonstrate compliance with AfDB OS5 and confirm whether livelihood restoration objectives have been achieved.

## 12.5 Evaluation of Livelihood Restoration

Evaluation of livelihood restoration will determine whether the RAP/LRP has achieved its core objective: ensuring that PAPs are able to restore, and where possible improve, their income levels and livelihood conditions after relocation. Because the project primarily causes economic

displacement, evaluation will focus not only on whether PAPs were relocated, but whether they have been able to resume viable economic activities at the new site.

### Key Evaluation Criteria

| Evaluation Area                     | Assessment Focus                                                                              |
|-------------------------------------|-----------------------------------------------------------------------------------------------|
| Resumption of livelihood activities | Whether PAPs have restarted scrap dealing, waste picking, trading, or related work            |
| Income restoration                  | Whether PAP income has returned to pre-project levels or improved                             |
| Working conditions                  | Whether the new site provides safer, more organized, and functional operating conditions      |
| Market access                       | Whether PAPs have maintained access to buyers, suppliers, transport routes, and waste streams |
| Business continuity                 | Whether business operations are stable after relocation                                       |

### Evaluation Methods

Evaluation will be conducted through:

- follow-up interviews with PAPs;
- comparison of post-relocation income with baseline data;
- site inspections at the relocation site;
- review of livelihood restoration support records;
- feedback from PAP associations and market actors.

### Corrective Measures

Where gaps are identified, the PCU will implement additional support measures, which may include:

- additional market linkage support;
- further business restart assistance;
- additional training or employment linkage;
- review of site allocation or operating conditions;
- targeted follow-up for PAPs facing persistent livelihood challenges.

In conclusion, livelihood restoration will be considered successful only when PAPs are able to resume economic activities and restore income to pre-project levels or better. This evaluation process ensures that RAP implementation is measured by real livelihood recovery, not only by completion of compensation and relocation activities.

## 12.6 Completion Audit

A RAP Completion Audit will be conducted at the end of implementation to provide an independent and systematic assessment of whether all commitments under the RAP and LRP have been fulfilled. The audit serves as the final verification mechanism to confirm compliance with AfDB Operational Safeguard 5 (OS5) and to determine whether the project has successfully

addressed all resettlement and livelihood restoration obligations. The Completion Audit will assess both:

- process compliance (e.g., compensation, relocation, documentation); and
- outcome performance (e.g., livelihood and income restoration).

Where required, the audit may be conducted by an independent third party to ensure objectivity and credibility.

### **Objectives of the Completion Audit**

The Completion Audit will aim to:

- verify that all eligible PAPs have received their full entitlements in accordance with the RAP;
- confirm that relocation has been completed in line with agreed procedures and timelines;
- assess whether PAPs have resumed their livelihood activities;
- evaluate whether income levels have been restored or improved compared to baseline;
- identify any outstanding issues, gaps, or unresolved cases;
- recommend corrective actions where necessary to achieve full compliance.

### **Scope of the Audit**

The audit will cover the following areas:

| Area                   | Focus                                                 |
|------------------------|-------------------------------------------------------|
| Compensation           | Completeness, accuracy, and timeliness of payments    |
| Relocation             | Site readiness, PAP movement, and settlement outcomes |
| Livelihood Restoration | Business re-establishment and income recovery         |
| GRM                    | Status and resolution of grievances                   |
| Documentation          | Completeness and accuracy of RAP records              |
| Stakeholder Engagement | Adequacy of consultations and disclosure              |

### **Completion Criteria**

The RAP will be considered complete when the following conditions are met:

- all compensation has been fully paid to eligible PAPs;
- all PAPs have been successfully relocated to the new site;
- livelihood restoration measures have been implemented;
- PAPs have restored or improved their income levels compared to pre-project conditions;
- all grievances have been resolved or are being managed through established processes.

### **Post-Audit Actions**

If the audit identifies gaps or unmet obligations:

- corrective actions will be developed and implemented by the PCU;
- additional support may be provided to affected PAPs;
- follow-up monitoring will be conducted until compliance is achieved.

In conclusion, the Completion Audit ensures that RAP implementation is not considered complete based solely on activity completion, but on the actual restoration of livelihoods and fulfillment of all commitments. It provides assurance to stakeholders and financing partners that the project has met its resettlement obligations in a fair, transparent, and compliant manner.

## 12.7 Corrective Action Mechanism

The corrective action mechanism provides a structured approach for addressing gaps identified during monitoring, evaluation, or the Completion Audit. It ensures that RAP and LRP implementation remains responsive, adaptive, and outcome-focused, particularly in relation to livelihood restoration. Given that RAP success is measured not only by completion of activities but by actual restoration of PAP livelihoods, any identified shortfalls must be promptly addressed through targeted and verifiable corrective actions.

### Corrective Action Process

If monitoring or audit findings indicate gaps, the project will:

- **identify the root cause**  
Conduct a detailed assessment to determine whether the issue arises from design gaps, implementation delays, institutional weaknesses, or external factors;
- **implement corrective measures**  
Develop and execute targeted actions to address the identified gap (e.g., additional compensation verification, improved relocation support, enhanced market linkage interventions);
- **provide additional support to affected PAPs**  
Deliver supplementary livelihood restoration assistance, technical support, or follow-up engagement to PAPs who have not successfully restored their livelihoods;
- **update monitoring records and report progress**  
Document all corrective actions taken, track progress, and include updates in RAP monitoring and reporting systems.

**Table 67: Corrective Action Framework**

| Issue Identified             | Corrective Action                                                   | Responsible Entity  | Timeline    |
|------------------------------|---------------------------------------------------------------------|---------------------|-------------|
| Delays in compensation       | Fast-track verification and payment process                         | PCU / RAP Team      | Immediate   |
| Incomplete relocation        | Resolve logistical or site readiness issues and complete relocation | PCU / Contractors   | Short-term  |
| Livelihood not restored      | Provide additional livelihood support and follow-up                 | PCU / LRP Team      | Medium-term |
| High grievance levels        | Strengthen GRM responsiveness and engagement                        | GRM Committee / PCU | Immediate   |
| Data gaps or inconsistencies | Update records and re-verify PAP information                        | PCU / M&E Team      | Immediate   |

**Implementation Principle**

Corrective actions will be:

- time-bound and clearly assigned to responsible entities;
- documented and monitored until resolution is achieved;
- aligned with RAP objectives and AfDB OS5 requirements;
- communicated to affected PAPs and stakeholders where relevant.

In conclusion, the monitoring, evaluation, and completion audit framework ensures that RAP implementation is not only compliant but also effective in achieving its ultimate objective: restoring livelihoods and ensuring PAPs are not worse off as a result of the project.

### 13. BUDGET AND FINANCING ARRANGEMENTS

This chapter presents the estimated budget required for the implementation of the Resettlement Action Plan (RAP) and Livelihood Restoration Plan (LRP), as well as the financing arrangements to ensure that all commitments are adequately resourced. In line with AfDB Operational Safeguard 5 (OS5), the project must ensure that sufficient funds are available, allocated, and accessible to cover all costs associated with compensation, relocation, livelihood restoration, grievance management, monitoring, and administration. Given that this RAP is primarily based on economic displacement and relocation to a new site, the budget emphasizes:

- relocation logistics and site preparation;
- business re-establishment support;
- livelihood restoration measures;
- implementation and monitoring costs.

All cost estimates are indicative and will be finalized during detailed implementation planning.

#### 13.1 Budget Principles

The RAP/LRP budget has been developed to ensure that all resettlement, relocation, and livelihood restoration commitments are fully financed, realistic, and implementable. In line with AfDB Operational Safeguard 5 (OS5), the project must demonstrate that adequate financial resources are available to meet all obligations to Project Affected Persons (PAPs) before displacement occurs. Given that this RAP is centered on economic displacement and relocation to a new site, the budget prioritizes funding for relocation logistics, site readiness, business re-establishment, and livelihood continuity. The following principles guide the preparation and execution of the RAP budget:

- **Full Cost Coverage**  
All eligible PAPs will receive their full entitlements as defined in Chapter 9. The budget covers compensation, relocation support, livelihood restoration, and implementation costs to ensure PAPs are not left worse off.
- **Replacement Cost Basis**  
Compensation for affected structures and assets is calculated based on full replacement cost, ensuring PAPs can rebuild or replace assets without financial loss.
- **No Depreciation**  
Asset values are not reduced for age, condition, or prior use. This ensures fairness and aligns with international best practice.
- **Implementation Readiness**  
All required funds will be secured and made available **prior to compensation and relocation**, ensuring that no displacement occurs without payment and support.
- **Contingency Provision**  
A contingency allocation is included to address unforeseen costs, price variations, or implementation adjustments without compromising RAP delivery.
- **Cost Efficiency and Practicality**  
The budget prioritizes practical support (e.g., relocation logistics, site preparation, business restart) over excessive cash compensation, particularly for movable business assets such as scrap materials.

### 13.2 Summary RAP Budget

The summary budget provides an indicative estimate of the financial resources required to implement the RAP and LRP. It reflects the scale of impacts identified in the ESIA and census, and the selected mitigation approach, which emphasizes relocation, livelihood restoration, and system integration rather than cash-heavy compensation. The budget is structured around key implementation components, ensuring that all phases, from compensation to post-relocation monitoring, are adequately resourced.

**Table 68: Summary Budget Estimate**

| Cost Category                      | Description                                                                 | Estimated Cost (USD) |
|------------------------------------|-----------------------------------------------------------------------------|----------------------|
| Relocation logistics               | Transport of materials, equipment, and relocation support                   | 25,000               |
| Relocation site preparation        | Basic infrastructure (access roads, drainage, demarcation)                  | 30,000               |
| Livelihood restoration support     | Business restart, training, and market linkage                              | 25,000               |
| Transitional support (contingency) | Trigger-based income support (activated after 6 months delay in relocation) | 25,000               |
| GRM implementation                 | Setup and operation of grievance system                                     | 25,000               |
| RAP implementation (PCU & team)    | Staffing, coordination, and field implementation                            | 20,000               |
| Monitoring and evaluation          | Data collection, reporting, and audit activities                            | 20,000               |
| <b>Subtotal</b>                    |                                                                             | <b>150,000</b>       |
| Contingency (10%)                  | Unforeseen costs and adjustments                                            | 50,000               |
| <b>Total Estimated Budget</b>      |                                                                             | <b>200,000</b>       |

#### Clarification Note

The total estimated budget has been recalculated based on the updated cost inputs. The correct total is: USD 200,000 (including contingency)

In conclusion, the RAP budget is designed to ensure that all resettlement-related obligations are financially supported in a realistic and efficient manner. By focusing on relocation readiness, livelihood restoration, and implementation capacity, the budget supports a smooth transition for PAPs and sustainable recovery of their economic activities

### 13.3 Detailed Budget Breakdown

This section provides a detailed explanation of the cost components presented in the summary budget. The breakdown reflects the **nature of impacts identified in the ESIA and census**,

particularly the predominance of economic displacement and the selected mitigation approach centered on **relocation and livelihood restoration rather than cash-heavy compensation**.

The budget is therefore structured to prioritize:

- restoration of business operations;
- continuity of income-generating activities;
- efficient relocation of movable assets;
- strong implementation, monitoring, and grievance systems.

### **Compensation Costs**

There shall be no direct cash compensation. The compensation approach is designed to ensure that PAPs are able to re-establish their structures without financial loss, while also providing practical alternatives where appropriate.

- Structures such as sheds, kiosks, and containers will be replaced
- The Accra Metropolitan Assembly (AMA) shall directly construct or provide equivalent replacement structures at the relocation site, where this is more efficient, standardized, or preferred by PAPs;
- Reconstruction will be carried out transparently, with PAP participation and proper documentation.

### **Relocation Costs**

Relocation is the core mitigation measure under this RAP and represents a significant portion of the budget. Costs are designed to ensure a smooth and organized transition to the new site.

- Transport of scrap materials, tools, equipment, and movable assets;
- Provision of labour for loading, unloading, and handling materials;
- Site allocation and demarcation to ensure orderly occupation;
- Support for initial setup at the new site, including positioning of structures and materials.

These measures are critical to minimizing downtime and enabling PAPs to quickly resume operations.

Importantly:

- Scrap materials are not treated as waste, but as business inventory and working capital; therefore:
  - they are excluded from cash compensation;
  - they will be fully relocated with logistical support to ensure continuity of business operations.

This combined approach ensures flexibility, fairness, and practicality, while minimizing risks of under-compensation, misuse of funds, or delays in re-establishing livelihoods.

### **Livelihood Restoration Costs**

Livelihood restoration costs are designed to ensure that PAPs are able to re-establish and sustain their economic activities after relocation.

- Business restart support, including tools, materials, and setup assistance;

- Skills training and employment linkages where needed;
- Market integration and coordination to reconnect PAPs with buyers, suppliers, and waste streams.

This component is essential to achieving the RAP objective of income restoration and long-term economic stability.

### **Transitional Support (Conditional)**

Transitional support is a contingency measure and will only be activated if relocation is delayed.

- Activated only if relocation is not completed within six (6) months from the official relocation start date;
- Designed to compensate PAPs for temporary income loss due to project delays;
- Based on income levels established through the socio-economic survey.

This ensures PAPs are protected from financial hardship arising from implementation delays.

### **GRM Costs**

The Grievance Redress Mechanism (GRM) is essential for maintaining transparency, trust, and conflict resolution throughout RAP implementation.

- Establishment and operationalization of GRM structures at all levels;
- Communication channels including hotline, meetings, and documentation systems;
- Case handling, investigation, and reporting.

These costs ensure that grievances are addressed efficiently and fairly.

### **Implementation and Administration Costs**

Implementation costs cover the operational requirements of the PCU and RAP Implementation Team.

- Staffing and coordination of RAP activities;
- Field logistics, supervision, and operational support;
- Documentation, reporting, and data management systems.

These costs are necessary to ensure that RAP activities are delivered in a structured and accountable manner.

### **Monitoring and Evaluation Costs**

Monitoring and evaluation costs ensure that RAP implementation is tracked, verified, and assessed against defined objectives.

- Field surveys and follow-up assessments of PAPs;
- Data collection, analysis, and reporting;
- RAP Completion Audit to verify full compliance and livelihood restoration outcomes.

This component ensures that the RAP is not only implemented, but that it achieves its intended results.

In conclusion, the detailed budget breakdown demonstrates that resources are allocated in a manner that prioritizes practical livelihood restoration, efficient relocation, and strong implementation systems. This ensures that PAPs are supported throughout the transition process and are able to restore their livelihoods in line with AfDB OS5 requirements.

### **13.4 Financing Arrangements**

The RAP will be financed by the project proponent (Accra Metropolitan Assembly - AMA), with support from project financing partners where applicable.

#### **Key Financing Commitments**

- Funds will be secured and allocated prior to RAP implementation;
- Compensation funds will be available before relocation begins;
- Dedicated budget lines will be established for RAP activities;
- Financial management will be handled through the PCU.

### **13.5 Fund Flow and Disbursement**

- Funds will be managed through a dedicated RAP account;
- Disbursement will follow approved procedures and documentation;
- Payments to PAPs will be transparent, traceable, and documented;
- Financial records will be subject to audit and review.

### **13.6 Budget Monitoring and Control**

- Budget utilization will be tracked regularly by the PCU;
- Variances will be identified and addressed promptly;
- Financial reporting will be integrated into RAP progress reports;
- Adjustments may be made based on implementation realities.

In conclusion, the RAP budget ensures that all components, compensation, relocation, livelihood restoration, grievance management, and monitoring, are adequately funded. By securing and managing these resources effectively, the project will be able to implement the RAP in a manner that is fair, compliant, and capable of restoring PAP livelihoods sustainably.

## 14. CONCLUSION AND RECOMMENDATIONS

This chapter consolidates the key findings, commitments, and implementation priorities of the Resettlement Action Plan (RAP) and Livelihood Restoration Plan (LRP). It presents a clear summary of how the project will manage economic displacement in a manner that is practical, compliant, and outcome-focused, in line with AfDB Operational Safeguard 5 (OS5) and national regulatory requirements. The RAP has been developed based on field observations, census and asset inventory, and extensive stakeholder consultations, and reflects a relocation-centered approach tailored to the realities of informal, site-based livelihoods. The emphasis throughout is on livelihood continuity, rapid recovery, and sustainable re-establishment of economic activities.

### 14.1 Conclusion

#### Summary of Key Findings

The RAP establishes the following:

- The project will result primarily in economic displacement, affecting scrap dealers, waste pickers, informal workers, and associated service providers operating within the project footprint;
- The project involves a confirmed land-take of approximately 1.77 hectares, currently occupied by informal economic activities;
- PAPs are highly dependent on location-specific livelihoods, making relocation and livelihood restoration critical to avoiding long-term socio-economic impacts;
- No vulnerable groups were formally identified during the census; however, a precautionary and adaptive approach has been embedded to address any vulnerability that may emerge during implementation;
- Scrap materials constitute business inventory and working capital, and therefore relocation with logistical support, not cash compensation, is the appropriate and efficient mitigation strategy.

#### Key RAP Commitments

The project commits to the following core principles and actions:

- Provision of in-kind reconstruction (by AMA) for affected structures, based on PAP preference and practicality;
- Relocation to a fully prepared alternative site prior to displacement, ensuring continuity of operations;
- Provision of comprehensive relocation support, including transport, labour, and setup assistance;
- Implementation of a Livelihood Restoration Plan (LRP) to restore and sustain income levels;
- Establishment and operationalization of a functional and accessible Grievance Redress Mechanism (GRM);
- Continuous stakeholder engagement, consultation, and information disclosure throughout implementation;
- Implementation of a robust monitoring, evaluation, and completion audit framework to verify compliance and outcomes.

## Critical Success Factors

Successful implementation of the RAP will depend on the following:

- Timely availability and disbursement of funds prior to displacement;
- Full readiness of the relocation site, including infrastructure, demarcation, and accessibility;
- Strong coordination through a well-resourced and functional Project Coordination Unit (PCU);
- Effective and continuous engagement with PAPs and their associations to build trust and cooperation;
- Practical and well-targeted livelihood restoration interventions that support rapid income recovery;
- Efficient and responsive GRM operations to manage disputes and concerns;
- Continuous monitoring, learning, and adaptive management to respond to implementation challenges.

## Key Risks and Mitigation

The RAP identifies several key risks:

- delays in relocation and relocation-site readiness;
- temporary or prolonged livelihood disruption during transition;
- disputes over eligibility, compensation, or site allocation;
- potential exclusion of PAPs from reorganized or formalized economic systems.

These risks are mitigated through:

- clear implementation sequencing, ensuring no displacement before compensation and site readiness;
- a trigger-based transitional support mechanism (activated after six months if relocation is delayed);
- transparent and participatory allocation and compensation processes;
- a strong, accessible, and multi-tiered GRM system;
- continuous stakeholder engagement and communication.

## 14.2 Recommendations

To ensure effective and successful RAP implementation, the following actions are recommended:

### 1. Ensure Relocation Site Readiness Before Displacement

No PAP should be displaced until the alternative site is fully prepared, serviced, and capable of supporting ongoing economic activities.

### 2. Prioritize Livelihood Continuity

Minimize disruption by ensuring rapid relocation, immediate setup support, and early re-establishment of business operations.

### 3. Adopt a Participatory Implementation Approach

Actively involve PAPs in site planning, allocation, and implementation decisions to enhance ownership and reduce conflict.

**4. Strengthen Coordination and Oversight**

Ensure the PCU is fully staffed, resourced, and empowered to coordinate all RAP and LRP activities effectively.

**5. Maintain Strong Monitoring and Reporting Systems**

Track both compliance (activities completed) and outcomes (livelihood restoration), and respond promptly to identified gaps.

**6. Ensure Financial Readiness and Control**

Secure, ring-fence, and manage RAP funds efficiently to avoid delays in compensation, relocation, and livelihood support.

**7. Enforce Accountability and Compliance**

Strictly apply the principle that no displacement occurs before compensation and relocation support are delivered, in line with AfDB OS5.

### **14.3 Final Conclusion**

This RAP provides a comprehensive, practical, and implementation-ready framework for managing project-related displacement. By focusing on relocation, livelihood restoration, and structured institutional arrangements, the plan ensures that PAPs are not only compensated but are supported to rebuild, restore, and sustain their economic activities. The approach adopted, particularly the emphasis on relocation of business assets, structured site allocation, and livelihood continuity, is well aligned with the nature of impacts and the socio-economic context of the affected population. With proper implementation, strong coordination, and continuous monitoring, the project will be able to achieve its development objectives while ensuring that:

- affected persons are treated fairly and transparently;
- livelihoods are restored or improved;
- social risks are effectively managed;
- full compliance with AfDB OS5 is achieved.

## ANNEXES

### Annex 1: Monitoring Indicators and Reporting Templates

#### A4.1 Purpose

This annex provides the indicators and reporting templates for tracking RAP/LRP implementation. It supports monitoring of compensation, relocation, livelihood restoration, grievance management, stakeholder engagement, documentation, and completion audit.

#### A4.2 RAP/LRP Monitoring Indicators

| Monitoring Area | Indicator                                        | Target              | Means of Verification                    | Frequency                   | Responsible Entity |
|-----------------|--------------------------------------------------|---------------------|------------------------------------------|-----------------------------|--------------------|
| Compensation    | % of eligible PAPs compensated before relocation | 100%                | Payment records, signed agreements       | Monthly                     | PCU / RAP Team     |
| Compensation    | Outstanding compensation cases                   | 0 before relocation | Compensation register                    | Weekly during payment phase | PCU / RAP Team     |
| Relocation      | % of eligible PAPs relocated to new site         | 100%                | Relocation logs, site allocation records | Monthly                     | PCU / RAP Team     |
| Relocation      | PAPs receiving relocation logistics support      | 100%                | Transport records, movement forms        | Weekly during relocation    | RAP Team           |
| Site Readiness  | Relocation site prepared before displacement     | 100%                | Site inspection checklist                | Before relocation           | PCU / Contractor   |

| Monitoring Area        | Indicator                               | Target               | Means of Verification              | Frequency             | Responsible Entity        |
|------------------------|-----------------------------------------|----------------------|------------------------------------|-----------------------|---------------------------|
| Livelihood Restoration | PAPs able to resume economic activities | ≥90%                 | PAP interviews, field verification | Quarterly             | PCU / LRP Team            |
| Income Restoration     | PAP income compared to baseline         | Restored or improved | Follow-up socio-economic survey    | Quarterly / Bi-annual | PCU / M&E Officer         |
| GRM                    | % of grievances resolved                | ≥90%                 | GRM register                       | Monthly               | GRM Officer               |
| GRM                    | Average grievance resolution time       | ≤30 days             | GRM logs                           | Monthly               | GRM Officer               |
| Stakeholder Engagement | Consultations conducted as planned      | 100%                 | Minutes, attendance sheets         | Monthly / Quarterly   | Community Liaison Officer |
| Documentation          | Completeness of RAP records             | 100%                 | RAP database, audit checks         | Quarterly             | PCU                       |
| Completion Audit       | RAP completion audit conducted          | Yes                  | Completion audit report            | End of implementation | PCU / Independent Auditor |

#### A4.3 Compensation Monitoring Template

| No. | PAP Code | PAP Category | Type of Loss | Entitlement | Amount / Support Agreed | Date Agreement Signed | Date Paid / Delivered | Status         | Remarks |
|-----|----------|--------------|--------------|-------------|-------------------------|-----------------------|-----------------------|----------------|---------|
| 1   |          |              |              |             |                         |                       |                       | Paid / Pending |         |
| 2   |          |              |              |             |                         |                       |                       | Paid / Pending |         |

#### A4.4 Relocation Tracking Template

| No. | PAP Code | Current Location / Cluster | New Site Allocation / Plot No. | Assets Relocated | Transport Support Provided | Date Relocated | Setup Completed | Issues / Follow-up |
|-----|----------|----------------------------|--------------------------------|------------------|----------------------------|----------------|-----------------|--------------------|
| 1   |          |                            |                                |                  | Yes / No                   |                | Yes / No        |                    |
| 2   |          |                            |                                |                  | Yes / No                   |                | Yes / No        |                    |

#### A4.5 Livelihood Restoration Monitoring Template

| No. | PAP Code | PAP Category | Pre-Project Livelihood | Post-Relocation Activity | Income Restored?   | Support Provided | Further Support Needed? | Remarks |
|-----|----------|--------------|------------------------|--------------------------|--------------------|------------------|-------------------------|---------|
| 1   |          |              |                        |                          | Yes / No / Partial |                  | Yes / No                |         |
| 2   |          |              |                        |                          | Yes / No / Partial |                  | Yes / No                |         |

#### A4.6 GRM Monitoring Template

| No. | Grievance Ref. No. | Date Received | Complainant / PAP Code | Complaint Category                                           | Assigned Entity | Resolution Action | Date Resolved | Status                    | Remarks |
|-----|--------------------|---------------|------------------------|--------------------------------------------------------------|-----------------|-------------------|---------------|---------------------------|---------|
| 1   |                    |               |                        | Eligibility / Compensation / Relocation / Livelihood / Other |                 |                   |               | Open / Closed / Escalated |         |
| 2   |                    |               |                        | Eligibility / Compensation / Relocation / Livelihood / Other |                 |                   |               | Open / Closed / Escalated |         |

#### A4.7 Stakeholder Engagement Reporting Template

| No. | Date | Location | Stakeholder Group | Purpose of Engagement | Key Issues Raised | Response / Commitment | Responsible Entity | Follow-up Required |
|-----|------|----------|-------------------|-----------------------|-------------------|-----------------------|--------------------|--------------------|
| 1   |      |          |                   |                       |                   |                       |                    | Yes / No           |
| 2   |      |          |                   |                       |                   |                       |                    | Yes / No           |

#### A4.8 Monthly RAP Implementation Progress Report Template

| Reporting Item                   | Details to be Provided                                        |
|----------------------------------|---------------------------------------------------------------|
| Reporting period                 | Month / quarter covered                                       |
| Key activities completed         | Compensation, relocation, consultation, monitoring activities |
| Compensation status              | Number paid, number pending, issues encountered               |
| Relocation status                | Number relocated, site readiness, pending relocation cases    |
| Livelihood restoration progress  | PAPs resumed work, support delivered, gaps identified         |
| GRM performance                  | Grievances received, resolved, pending, escalated             |
| Stakeholder engagement           | Meetings held, issues raised, commitments made                |
| Risks and challenges             | Implementation delays, disputes, site issues                  |
| Corrective actions               | Actions taken or proposed                                     |
| Next reporting period priorities | Planned activities and responsible persons                    |

#### A4.9 Completion Audit Checklist

| Audit Area             | Verification Question                                            | Evidence Required                        | Status             |
|------------------------|------------------------------------------------------------------|------------------------------------------|--------------------|
| Compensation           | Have all eligible PAPs received agreed entitlements?             | Payment records, signed agreements       | Yes / No           |
| Relocation             | Have all eligible PAPs been relocated to the new site?           | Relocation logs, site allocation records | Yes / No           |
| Livelihood Restoration | Have PAPs resumed income-generating activities?                  | PAP interviews, income comparison        | Yes / No / Partial |
| GRM                    | Have grievances been resolved or placed under active resolution? | GRM logs, closure records                | Yes / No           |
| Stakeholder Engagement | Were PAPs consulted throughout implementation?                   | Minutes, attendance sheets               | Yes / No           |
| Documentation          | Are RAP records complete and auditable?                          | RAP database, registers                  | Yes / No           |
| Corrective Actions     | Have outstanding gaps been addressed?                            | Corrective action reports                | Yes / No           |

#### A4.10 Reporting Flow

| Report / Record               | Prepared By               | Submitted To | Frequency                |
|-------------------------------|---------------------------|--------------|--------------------------|
| Relocation Tracking Report    | RAP Implementation Team   | PCU / AMA    | Weekly during relocation |
| GRM Report                    | GRM Officer               | PCU / AMA    | Monthly                  |
| Livelihood Restoration Report | LRP Team / M&E Officer    | PCU / AMA    | Quarterly                |
| RAP Progress Report           | PCU                       | AMA / AfDB   | Quarterly                |
| Completion Audit Report       | Independent Auditor / PCU | AMA / AfDB   | End of implementation    |

## Annex 2: Summary Compensation Sheet

| Code PAP* | PAP ID Number/ Code | First and last names of the PAP | Sex (M, F) and Age |    | Ghana Card ID Number | Profession and principal activity of PAP        | Tel. of the PAP and/or representative (+233) | PAP's Picture                                 | Image of the affected property/ies | GPS coordinates of the affected property/ies | Real compensation cost in local currency & dollars | Witness/Neighbor of the PAP - (Names and Tel.) |                                       |
|-----------|---------------------|---------------------------------|--------------------|----|----------------------|-------------------------------------------------|----------------------------------------------|-----------------------------------------------|------------------------------------|----------------------------------------------|----------------------------------------------------|------------------------------------------------|---------------------------------------|
|           |                     |                                 |                    |    |                      |                                                 |                                              |                                               |                                    |                                              |                                                    | Witness 1                                      | Witness 2                             |
| AAA001    | AM-WSSCP-PAP-001    | LATIF DANLADI                   | M                  | 40 | GHA-713098260-2      | Scrap dealer with both small container and shed | 248064740                                    | On Individual compensation sheet. See Annex 3 | N/A                                | 5°32' 40.40"N, 0°13' 32.34"W                 | N/A                                                | BABA MUMUNI - 0244306982                       | AMIDU ABUKARI - 0247907186            |
| AAA002    | AM-WSSCP-PAP-002    | ABUDULAI ABUDULAI               | M                  | 42 | GHA-001157607-3      | Scrap dealer with small container               | 244422764                                    |                                               |                                    | 5°32' 42.40"N, 0°13' 37.34"W                 |                                                    | WAHIDU ALHASSAN - 0249771175                   | LATIF DANLADI - 0248064740            |
| AAA003    | AM-WSSCP-PAP-003    | LUKMAN ABDULAI                  | M                  | 42 | GHA-001157607-3      | Scrap dealer with small shed                    | 279752687                                    |                                               |                                    | 5°32' 41.40"N, 0°13' 35.34"W                 |                                                    | YUSIF IBRAHIM - 0544536267                     | ISSAH YAKUBU - 0555487902             |
| AAA004    | AM-WSSCP-PAP-004    | NATOGMAH MOHAMMED               | M                  | 57 | GHA-001157157-3      | Scrap dealer with small shed                    | 242823826                                    |                                               |                                    | 5°32' 39.40"N, 0°13' 33.34"W                 |                                                    | ALHASSAN ANDANI MAHAMUD - 0242002058           | YAKUBU MOHAMMED ALHASSAN - 0244059726 |
| AAA005    | AM-WSSCP-PAP-005    | IDDRISU SEIDU                   | M                  | 42 | GHA-713012827-5      | Scrap dealer with small container               | 244069784                                    |                                               |                                    | 5°32' 42.40"N,                               |                                                    | TAHIRU ADAM - 0248140407                       | OSMAN BABA -                          |

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|           |                     |                                 |                    |    |                      |                                                      |                                              |               |                                    | 0°13' 37.34"W                                |                                                    |                                                | 0246986780                           |
| AAA006    | AM-WSSCP-PAP-006    | MAHAMADU SUALISU                | M                  | 40 | GHA-728811168-8      | Scrap dealer with small container and movable canopy | 244143985                                    |               |                                    | 5°32' 42.08"N, 0°13' 35.53"W                 |                                                    | ZIBLIADA KADIRU - 0544265222                   | AMADU ABDALA - 0545599110            |
| AAA007    | AM-WSSCP-PAP-007    | ISSAHAKU ABDUL MAJEED           | M                  | 43 | GHA-001980709-9      | Scrap dealer with small container only               | 556531051                                    |               |                                    | 5°32' 41.40"N, 0°13' 35.34"W                 |                                                    | YAKUBU MOHAMMED ALHASSAN - 0244059726          | ALHASSAN ANDANI MAHAMUD - 0242002058 |
| AAA008    | AM-WSSCP-PAP-008    | ALHASSAN FUSEINI                | M                  | 51 | GHA-001881587-0      | Scrap dealer with small shed and container           | 244595936                                    |               |                                    | 5°32' 41.40"N, 0°13' 35.34"W                 |                                                    | FUSEINI ALHASSAN - 0247270141                  | SUMAILA LUGSHINA - 0546064454        |
| AAA009    | AM-WSSCP-PAP-009    | AMIDU ABUKARI                   | M                  | 44 | GHA-714441246-7      | Scrap dealer with small shed                         | 247907186                                    |               |                                    | 5°32' 41.40"N, 0°13' 35.34"W                 |                                                    | ISSAHAKU ALHASSAN - 0244247831                 | ALHASSAN FUSEINI - 0544149425        |
| AAA010    | AM-WSSCP-PAP-010    | ALHASSAN MOHAMMED               | M                  | 47 | GHA-002078005-4      | Scrap dealer                                         | 249301880                                    |               |                                    | 5°32' 42.50"N, 0°13' 36.34"W                 |                                                    | SAFIANU ABU - 0240959752                       | ALHASSAN FUSEINI - 0244595936        |

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| AAA011    | AM-WSSCP-PAP-011    | ALHASSAN MOHAMMED BABA          | M                  | 48 | GHA-712699014-7      | Scrap dealer with small container, shed, mosque and hencoop for poultry | 242836334                                    |               |                                    | 5°32' 42.53"N, 0°13' 37.04"W                 |                                                    | YAHAYA FUSEINI - 0242306640                    | ZIBLIADA KADIRU - 0544265222   |
| AAA012    | AM-WSSCP-PAP-012    | FUSEINI ALHASSAN                | M                  | 40 | GHA-725582719-2      | Scrap dealer with small container only                                  | 247270141                                    |               |                                    | 5°32' 42.40"N, 0°13' 37.34"W                 |                                                    | ALHASSAN FUSEINI - 0244595936                  | SUMAILA LUGSHINA - 0546064454  |
| AAA013    | AM-WSSCP-PAP-013    | IBRAHIM ABDULAI                 | M                  | 35 | GHA-715853367-3      | Scrap dealer                                                            | 552959037                                    |               |                                    | 5°32' 42.72"N, 0°13' 35.60"W                 |                                                    | ALHASSAN FUSEINI - 0544149425                  | ISSAHAKU ALHASSAN - 0244247831 |
| AAA014    | AM-WSSCP-PAP-014    | BABA MUMUNI                     | M                  | 46 | GHA-726061023-3      | Scrap dealer                                                            | 244306982                                    |               |                                    | 5°32' 42.71"N, 0°13' 36.60"W                 |                                                    | ISSAHAKU ALHASSAN - 0244247831                 | ALHASSAN FUSEINI - 0544149425  |
| AAA015    | AM-WSSCP-PAP-015    | MOHAMMED ISSAKA                 | M                  | 61 | GHA-004783069-9      | Scrap dealer                                                            | 243615374                                    |               |                                    | 5°32' 42.61"N, 0°13' 34.34"W                 |                                                    | SEIDU ZAKARIA - 0245057730                     | OSMAN MOHAMMED - 0249760256    |
| AAA016    | AM-WSSCP-PAP-016    | ALHASSAN KOFI                   | M                  | 54 | GHA-001977466-2      | Scrap dealer                                                            | 243157780                                    |               |                                    | 5°32' 42.50"N, 0°13' 36.34"W                 |                                                    | YAKUBU ABDUL-LATIF - 0243973185                | TIYA BABA - 0242227363         |

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| AAA017    | AM-WSSCP-PAP-017    | IDDRISU ALHASSAN                | M                  | 40 | GHA-712817754-6      | Scrap dealer                             | 544004470                                    |               |                                    | 5°32' 41.50"N, 0°13' 36.74"W                 |                                                    | YAHAYA MUMUNI - 0243178766                     | YAKUBU ABDUL-LATIF - 0243973185        |
| AAA018    | AM-WSSCP-PAP-018    | ABDUL RAUF ALHASSAN             | M                  | 40 | GHA-720778305-3      | Scrap dealer                             | 248777582                                    |               |                                    | 5°32' 41.50"N, 0°13' 36.34"W                 |                                                    | LUKMAN ABDULAI - 0279752687                    | ABU ABDULAI - 0248534295               |
| AAA019    | AM-WSSCP-PAP-019    | YUSIF IBRAHIM                   | M                  | 46 | GHA-712749914-2      | Scrap dealer                             | 544536267                                    |               |                                    | 5°32'.43.50" N, 0°13' 36.54"W                |                                                    | ALHASSAN MOHAMMED BABA - 0242836334            | YAHAYA MUMUNI - 0243178766             |
| AAA020    | AM-WSSCP-PAP-020    | ABU ABDULAI                     | M                  | 38 | GHA-725776408-8      | Scrap dealer                             | 248534295                                    |               |                                    | 5°32' 46.50"N, 0°13' 35.34"W                 |                                                    | IBRAHIM ABDULAI - 0552959037                   | ABUDULAI ABUDULAI - 0244422764         |
| AAA021    | AM-WSSCP-PAP-021    | FUSEINI ABDUL RAHMAN ADAM       | M                  | 46 | GHA-001190826-9      | Scrap dealer                             | 244064550                                    |               |                                    | 5°32' 44.50"N, 0°13' 36.34"W                 |                                                    | ABDUL RAUF ALHASSAN - 0248777582               | ABU ABDULAI - 0248534295               |
| AAA022    | AM-WSSCP-PAP-022    | ADAM FATUAM                     | M                  | 35 | GHA-724197186-7      | Scrap dealer                             | 249975589                                    |               |                                    | 5°32' 41.50"N, 0°13' 34.34"W                 |                                                    | ABDUL RAUF ALHASSAN - 0248777582               | FUSEINI ABDUL RAHMAN ADAM - 0244064550 |

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| AAA023    | AM-WSSCP-PAP-023    | SUMAILA LUGSHINA                | M                  | 30 | GHA-727309076-5      | Scrap dealer with small shed             | 546064454                                    |               |                                    | 5°32' 41.40"N, 0°13' 36.34"W                 |                                                    | FUSEINI ALHASSAN - 0247270141                  | ALHASSAN FUSEINI - 0244595936       |
| AAA024    | AM-WSSCP-PAP-024    | ZAKARIA OSMAN                   | M                  | 45 | GHA-716379172-9      | Scrap dealer                             | 244066171                                    |               |                                    | 5°32' 40.10"N, 0°13' 34.26"W                 |                                                    | ABUBAKARI SADIQ - 0261204978                   | IBRAHIM ALHASSAN - 0242933378       |
| AAA025    | AM-WSSCP-PAP-025    | OSMAN ABU                       | M                  | 46 | GHA-726456195-3      | Scrap dealer                             | 556749380                                    |               |                                    | 5°32' 40.12"N, 0°13' 34.28"W                 |                                                    | ALHASSAN MOHAMMED BABA - 0242836334            | ALHASSAN ABDULLAI - 0244309001      |
| AAA026    | AM-WSSCP-PAP-026    | YAKUBU ABDUL-LATIF              | M                  | 33 | GHA-725913145-1      | Scrap dealer                             | 243973185                                    |               |                                    | 5°32' 45.10"N, 0°13' 34.66"W                 |                                                    | OSMAN ABU - 0556749380                         | ALHASSAN MOHAMMED BABA - 0242836334 |
| AAA027    | AM-WSSCP-PAP-027    | SEIDU ZAKARIA                   | M                  | 37 | GHA-726408150-3      | Scrap dealer                             | 245057730                                    |               |                                    | 5°32' 50.10"N, 0°13' 34.26"W                 |                                                    | YAKUBU ABDUL-LATIF - 0243973185                | OSMAN ABU - 0556749380              |
| AAA028    | AM-WSSCP-PAP-028    | KOKOMBA SOMERD                  | M                  | 36 | GHA-713100793-9      | Scrap dealer                             | 548989901                                    |               |                                    | 5°32' 81.50"N, 0°12' 66.74"W                 |                                                    | HARUNA IBRAHIM - 0246169788                    | ALHASSAN NASH - 0244151236          |
| AAA029    | AM-WSSCP-PAP-029    | HARUNA IMRANA                   | M                  | 36 | GHA-001991806-2      | Scrap dealer                             | 249341506                                    |               |                                    | 5°32' 41.40"N,                               |                                                    | KOKOMBA SOMERD - 0548989901                    | ALHASSAN NASH -                     |

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|           |                     |                                 |                    |    |                      |                                          |                                              |               |                                    | 0°13' 39.74"W                                |                                                    |                                                | 0244151236                    |
| AAA030    | AM-WSSCP-PAP-030    | ZIBLIM DAWUDA                   | M                  | 47 | GHA-712747796-1      | Scrap dealer                             | 246805573                                    |               |                                    | 5°32' 40.50"N, 0°13' 36.74"W                 |                                                    | YAHAYA MUMUNI - 0243178766                     | ABDALLAH ZAKARIA - 0543655117 |
| AAA031    | AM-WSSCP-PAP-031    | HARUNA IBRAHIM                  | M                  | 46 | GHA-726448000-9      | Scrap dealer                             | 246169788                                    |               |                                    | 5°32' 41.50"N, 0°13' 36.74"W                 |                                                    | ZIBLIM DAWUDA - 0246805573                     | KOKOMBA SOMERD - 0548989901   |
| AAA032    | AM-WSSCP-PAP-032    | HAMDU SHAHADU                   | M                  | 36 | GHA-726450024-4      | Scrap dealer                             | 242614453                                    |               |                                    | 5°32'30.50"N , 0°13' 37.74"W                 |                                                    | ABDULAI KAMAL - 0244457916                     | ZIBLIM DAWUDA - 0246805573    |
| AAA033    | AM-WSSCP-PAP-033    | ABDULAI KAMAL                   | M                  | 36 | GHA-712850334-7      | Scrap dealer                             | 244457916                                    |               |                                    | 5°32' 31.50"N, 0°13' 22.74"W                 |                                                    | ABDALLAH ZAKARIA - 0543655117                  | YAHAYA MUMUNI - 0243178766    |
| AAA034    | AM-WSSCP-PAP-034    | OSMAN MOHAMMED                  | M                  | 46 | GHA-002077625-7      | Scrap dealer                             | 249760256                                    |               |                                    | 5°32' 11.50"N, 0°13' 30.74"W                 |                                                    | SEIDU ZAKARIA - 0245057730                     | OSMAN ABU - 0556749380        |
| AAA035    | AM-WSSCP-PAP-035    | TAHIRU ADAM                     | M                  | 41 | GHA-712754377-0      | Scrap dealer                             | 248140407                                    |               |                                    | 5°32' 44.50"N, 0°13' 26.74"W                 |                                                    | UMAR SALIFU - 0244105243                       | ZIBLIADA KADIRU - 0544265222  |
| AAA036    | AM-WSSCP-PAP-036    | YAHAYA FUSEINI                  | M                  | 40 | GHA-725988151-6      | Scrap dealer                             | 242306640                                    |               |                                    | 5°32' 41.40"N,                               |                                                    | ZIBLIADA KADIRU - 0544265222                   | MAHAMAD U SUALISU -           |

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|           |                     |                                 |                    |    |                      |                                          |                                              |               |                                    | 0°13' 66.74"W                                |                                                    |                                                | 0244143985                          |
| AAA037    | AM-WSSCP-PAP-037    | ALHASSAN ABDULLAI               | M                  | 38 | GHA-725520467-4      | Scrap dealer with small container        | 244309001                                    |               |                                    | 5°32' 40.40"N, 0°13' 35.03"W                 |                                                    | YAHAYA FUSEINI - 0242306640                    | ALHASSAN MOHAMMED BABA - 0242836334 |
| AAA038    | AM-WSSCP-PAP-038    | YAHAYA MUMUNI                   | M                  | 51 | GHA-001187272-6      | Scrap dealer                             | 243178766                                    |               |                                    | 5°32' 39.76"N, 0°13' 34.76"W                 |                                                    | ABDALLAH ZAKARIA - 0543655117                  | TIYA BABA - 0242227363              |
| AAA039    | AM-WSSCP-PAP-039    | SAFIANU ABU                     | M                  | 39 | GHA-002437557-9      | Scrap dealer                             | 240959752                                    |               |                                    | 5°32' 38.53"N, 0°13' 34.66"W                 |                                                    | UMAR SALIFU - 0244105243                       | ABDALLAH ZAKARIA - 0543655117       |
| AAA040    | AM-WSSCP-PAP-040    | UMAR SALIFU                     | M                  | 47 | GHA-001883163-2      | Scrap dealer                             | 244105243                                    |               |                                    | 5°32' 49.76"N, 0°13' 34.56"W                 |                                                    | TAHIRU ADAM - 0248140407                       | SAFIANU ABU - 0240959752            |
| AAA041    | AM-WSSCP-PAP-041    | SUMAILA ISSAHAKU                | M                  | 32 | GHA-726396425-6      | Scrap dealer                             | 244511227                                    |               |                                    | 5°32' 39.56"N, 0°13' 34.64"W                 |                                                    | TAHIRU ADAM - 0248140407                       | ALHASSAN FUSEINI - 0244595936       |
| AAA042    | AM-WSSCP-PAP-042    | TIYA BABA                       | M                  | 44 | GHA-726550535-0      | Scrap dealer with small container        | 242227363                                    |               |                                    | 5°32' 40.77"N, 0°13' 35.03"W                 |                                                    | DAMBA ABUBAKARI ALHASSAN - 0243549613          | ISSAHAKU ABDUL MAJEED - 0556531051  |

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| AAA043    | AM-WSSCP-PAP-043    | YAKUBU ABUBARKARI               | M                  | 42 | GHA-006562793-0      | Scrap dealer                               | 243138871                                    |               |                                    | 5°32' 25.53"N, 0°13' 44.66"W                 |                                                    | YUSIF IBRAHIM - 0544536267                     | ALHASSAN IBRAHIM - 244755557   |
| AAA044    | AM-WSSCP-PAP-044    | ABDUL-RASHID ISSAHAKU           | M                  | 32 | GHA-726796219-9      | Scrap dealer                               | 552000421                                    |               |                                    | 5°32' 49.40"N, 0°13' 34.70"W                 |                                                    | ISSAHAKU ALHASSAN - 0244247831                 | MAHAMAD U SUALISU - 0244143985 |
| AAA045    | AM-WSSCP-PAP-045    | ABDALLAH ZAKARIA                | M                  | 37 | GHA-712731021-8      | Scrap dealer with small shed and container | 543655117                                    |               |                                    | 5°32' 40.70"N, 0°13' 35.00"W                 |                                                    | SAFIANU ABU - 0240959752                       | YAHAYA MUMUNI - 0243178766     |
| AAA046    | AM-WSSCP-PAP-046    | AMADU DAUDA BAABA               | M                  | 42 | GHA-712867246-9      | Scrap dealer                               | 248451930                                    |               |                                    | 5°32' 41.23"N, 0°13' 34.55"W                 |                                                    | SULEMANA ADAM - 0244298242                     | IBRAHIM ALHASSAN - 0552074920  |
| AAA047    | AM-WSSCP-PAP-047    | ABUBAKARI SADIQ                 | M                  | 44 | GHA-726733465-5      | Scrap dealer                               | 261204978                                    |               |                                    | 5°32' 38.23"N, 0°13' 34.76"W                 |                                                    | ZAKARIA OSMAN - 0244066171                     | YAKUBU ABUBARKARI - 0243138871 |
| AAA048    | AM-WSSCP-PAP-048    | SULEMANA ADAM                   | M                  | 58 | GHA-713055151-0      | Scrap dealer                               | 244298242                                    |               |                                    | 5°32' 49.76"N, 0°13' 33.55"W                 |                                                    | ANNAN MOHAMMED - 0242362067                    | SUMAILA LUGSHINA - 0546064454  |

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| AAA049    | AM-WSSCP-PAP-049    | WAHIDU ALHASSAN                 | M                  | 39 | GHA-712736174-2      | Scrap dealer                             | 249771175                                    |               |                                    | 5°32' 39.56"N, 0°13' 34.64"W                 |                                                    | IBRAHIM ABDULAI - 0552959037                   | ABDULAI ALHASSAN - 0554512692 |
| AAA050    | AM-WSSCP-PAP-050    | ANNAN MOHAMMED                  | M                  | 33 | GHA-723608143-0      | Scrap dealer                             | 242362067                                    |               |                                    | 5°32' 19.76"N, 0°13' 24.76"W                 |                                                    | LUKSINA ADAM - 0551247561                      | IDDRISU ASAFO - 0243656448    |
| AAA051    | AM-WSSCP-PAP-051    | IDDRISU ASAFO                   | M                  | 40 | GHA-713027532-8      | Scrap dealer                             | 243656448                                    |               |                                    | 5°32' 40.53"N, 0°13' 14.66"W                 |                                                    | ANNAN MOHAMMED - 0242362067                    | LUKSINA ADAM - 0551247561     |
| AAA052    | AM-WSSCP-PAP-052    | MOHAMMED ABDULAI                | M                  | 52 | GHA-001156749-7      | Scrap dealer                             | 243356216                                    |               |                                    | 5°32' 19.76"N, 0°13' 14.56"W                 |                                                    | SUMAILA LUGSHINA - 0546064454                  | IBRAHIM ALHASSAN - 552074920  |
| AAA053    | AM-WSSCP-PAP-053    | ISSAHAKU ALHASSAN               | M                  | 41 | GHA-728148769-4      | Scrap dealer                             | 244247831                                    |               |                                    | 5°32' 29.56"N, 0°13' 34.64"W                 |                                                    | ALHASSAN FUSEINI - 0544149425                  | AMIDU ABUKARI - 0247907186    |
| AAA054    | AM-WSSCP-PAP-054    | SULEMAN IDDI                    | M                  | 48 | GHA-726249351-2      | Scrap dealer                             | 246599736                                    |               |                                    | 5°32' 19.76"N, 0°13' 34.76"W                 |                                                    | SUMAILA ISSAHAKU - 0244511227                  | ALHASSAN FUSEINI - 0544149425 |
| AAA055    | AM-WSSCP-PAP-055    | FUSEINI ADAMS                   | M                  | 46 | GHA-725751115-2      | Scrap dealer                             | 240048669                                    |               |                                    | 5°32' 37.53"N, 0°13' 34.66"W                 |                                                    | ABDULAI ALHASSAN - 0554512692                  | WAHIDU ALHASSAN -             |

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|           |                     |                                 |                    |    |                      |                                          |                                              |               |                                    |                                              |                                                    |                                                | 0249771175                            |
| AAA056    | AM-WSSCP-PAP-056    | ABDULAI ALHASSAN                | M                  | 38 | GHA-724575039-6      | Scrap dealer                             | 554512692                                    |               |                                    | 5°32' 43.46"N, 0°13' 24.56"W                 |                                                    | ISSAH YAKUBU - 0555487902                      | ABUDULAI ABUDULAI - 0244422764        |
| AAA057    | AM-WSSCP-PAP-057    | DAMBA ABUBAKARI ALHASSAN        | M                  | 49 | GHA-001839685-0      | Scrap dealer                             | 243549613                                    |               |                                    | 5°32' 59.56"N, 0°13' 37.64"W                 |                                                    | ISSAHAKU ABDUL MAJEED - 0556531051             | YAKUBU MOHAMMED ALHASSAN - 0244059726 |
| AAA058    | AM-WSSCP-PAP-058    | OSMAN BABA                      | M                  | 46 | GHA-725579012-0      | Scrap dealer                             | 246986780                                    |               |                                    | 5°32' 23.76"N, 0°13' 54.76"W                 |                                                    | ALHASSAN KOFI - 0243157780                     | ALHASSAN NASH - 0244151236            |
| AAA059    | AM-WSSCP-PAP-059    | ALHASSAN NASH                   | M                  | 51 | GHA-712951713-5      | Scrap dealer                             | 244151236                                    |               |                                    | 5°38' 39.43"N, 0°13' 44.76"W                 |                                                    | KOKOMBA SOMERD - 0548989901                    | HARUNA IBRAHIM - 0246169788           |
| AAA060    | AM-WSSCP-PAP-060    | ALHASSAN FUSEINI                | M                  | 26 | GHA-723819691-8      | Scrap dealer                             | 544149425                                    |               |                                    | 5°32' 70.76"N, 0°13' 80.76"W                 |                                                    | ISSAHAKU ALHASSAN - 0244247831                 | ABDUL-RASHID ISSAHAKU - 0552000421    |

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|-----------|---------------------|---------------------------------|--------------------|----|----------------------|--------------------------------------------------------|----------------------------------------------|---------------|------------------------------------|----------------------------------------------|----------------------------------------------------|------------------------------------------------|------------------------------------|
| AAA061    | AM-WSSCP-PAP-061    | TOYIBU YAKUBU                   | M                  | 58 | GHA-712667731-2      | Scrap dealer with shed for worship and meeting grounds | 243633290                                    |               |                                    | 5°32' 2.28"N, 0°13' 35.37"W                  |                                                    | ALHASSAN FUSEINI - 0244595936                  | SUMAILA ISSAHAKU - 0244511227      |
| AAA062    | AM-WSSCP-PAP-062    | IBRAHIM ALHASSAN                | M                  | 26 | GHA-724533038-1      | Scrap dealer                                           | 552074920                                    |               |                                    | 5°32' 70.76"N, 0°13' 36.76"W                 |                                                    | MOHAMMED ABDULAI - 0243356216                  | SUMAILA LUGSHINA - 0546064454      |
| AAA063    | AM-WSSCP-PAP-063    | ALHASSAN SAYIBU                 | M                  | 72 | GHA-001883170-2      |                                                        | 246373756                                    |               |                                    | 5°32' 70.76"N, 0°13' 40.78"W                 |                                                    | ALHASSAN FUSEINI - 0244595936                  | ISSAHAKU ABDUL MAJEED - 0556531051 |
| AAA064    | AM-WSSCP-PAP-064    | IBRAHIM ALHASSAN                | M                  | 48 | GHA-729019897-4      | Scrap dealer                                           | 242933378                                    |               |                                    | 5°32' 70.76"N, 0°13' 30.96"W                 |                                                    | MOHAMMED ISSAKA - 0243615374                   | ALHASSAN IBRAHIM - 0244755557      |
| AAA065    | AM-WSSCP-PAP-065    | ALHASSAN IBRAHIM                | M                  | 48 | GHA-727375148-8      | Scrap dealer                                           | 244755557                                    |               |                                    | 5°32' 70.76"N, 0°13' 72.06"W                 |                                                    | SEIDU ZAKARIA - 0245057730                     | OSMAN MOHAMMED - 0249760256        |
| AAA066    | AM-WSSCP-PAP-066    | AMADU ABDALA                    | M                  | 35 | GHA-728005933-7      | Scrap dealer with working container                    | 545599110                                    |               |                                    | 5°32' 41.55"N, 0°13' 32.56"W                 |                                                    | UMAR SALIFU - 0244105243                       | TAHIRU ADAM - 0248140407           |

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| AAA067    | AM-WSSCP-PAP-067    | ZIBLIADA KADIRU                 | M                  | 39 | GHA-713101747-9      | Scrap dealer                             | 544265222                                    |               |                                    | 5°32'.20.06" N, 0°13' 35.55"W                |                                                    | TAHIRU ADAM - 0248140407                       | AMADU ABDALA - 0545599110          |
| AAA068    | AM-WSSCP-PAP-068    | ALHASSAN FATAWU                 | M                  | 40 | GHA-003896002-2      | Scrap dealer                             | 545340816                                    |               |                                    | 5°32'.24.66" N, 0°13' 35.15"W                |                                                    | MUMUNI ABDUL FATAWU - 0243664444               | SUMAILA ISSAHAKU - 0244511227      |
| AAA069    | AM-WSSCP-PAP-069    | ALHASSAN ANDANI MAHAMUD         | M                  | 59 | GHA-727486996-4      | Scrap dealer                             | 242002058                                    |               |                                    | 5°32'.40.66" N, 0°13' 35.25"W                |                                                    | ALHASSAN FATAWU - 0545340816                   | ALHASSAN SAYIBU - 0246373756       |
| AAA070    | AM-WSSCP-PAP-070    | ADAM SALIFU                     | M                  | 40 | GHA-000512522-3      | Scrap dealer                             | 246746862                                    |               |                                    | 5°32'.41.66" N, 0°13' 38.25"W                |                                                    | FUSEINI ALHASSAN - 0247270141                  | ISSAHAKU ABDUL MAJEED - 0556531051 |
| AAA071    | AM-WSSCP-PAP-071    | FUSEINI ALHASSAN BABA           | M                  | 34 | GHA-729090225-6      | Scrap dealer                             | 243705333                                    |               |                                    | 5°32'.21.58" N, 0°13' 35.25"W                |                                                    | ANNAN MOHAMMED - 0242362067                    | ADAM LUKSINA - 0551247561          |
| AAA072    | AM-WSSCP-PAP-072    | YAKUBU MOHAMMED ALHASSAN        | M                  | 39 | GHA-712811976-3      | Scrap dealer                             | 244059726                                    |               |                                    | 5°32'.31.06" N, 0°13' 31.25"W                |                                                    | ALHASSAN FUSEINI - 0244595936                  | ALHASSAN SEIDU - 0542774649        |
| AAA073    | AM-WSSCP-PAP-073    | MUMUNI ABDUL FATAWU             | M                  | 43 | GHA-002077595-1      | Scrap dealer                             | 243664444                                    |               |                                    | 5°32'.41.76" N, 0°13' 25.25"W                |                                                    | NATOGMAH MOHAMMED - 0242823826                 | YAKUBU MOHAMMED ALHASSAN           |

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|-----------|---------------------|---------------------------------|--------------------|----|----------------------|------------------------------------------|----------------------------------------------|---------------|------------------------------------|----------------------------------------------|----------------------------------------------------|------------------------------------------------|-------------------------------------|
|           |                     |                                 |                    |    |                      |                                          |                                              |               |                                    |                                              |                                                    |                                                | - 0244059726                        |
| AAA074    | AM-WSSCP-PAP-074    | ISSAH YAKUBU                    | M                  | 49 | GHA-713361334-7      | Scrap dealer                             | 555487902                                    |               |                                    | 5°32'.41.26" N, 0°13' 25.25"W                |                                                    | ABDULAI ALHASSAN - 0554512692                  | FUSEINI ADAMS - 0240048669          |
| AAA075    | AM-WSSCP-PAP-075    | RALIATU SHAIBU                  | F                  | 22 | GHA-724493947-5      | Food and beverage vendor in a kiosk      | 535558050                                    |               |                                    | 5°32'.41.75" N, 0°13' 35.33"W                |                                                    | LUKSINA ADAM - 0551247561                      | ANNAN MOHAMMED - 0242362067         |
| AAA076    | AM-WSSCP-PAP-076    | LATIFA DAHAMANI                 | F                  | 26 | GHA-714816316-1      | Food and beverage vendor in a kiosk      | 559075632                                    |               |                                    | 5°32'.41.75" N, 0°13' 35.33"W                |                                                    | YAKUBU MOHAMMED ALHASSAN - 0244059726          | YAHAYA MUMUNI - 0243178766          |
| AAA077    | AM-WSSCP-PAP-077    | SULEMANA ABDUL RASHID           | M                  | 45 | GHA-001935961-4      | Scrap dealer                             | 242746104                                    |               |                                    | 5°32'.41.66" N, 0°13' 35.25"W                |                                                    | PAUL AMOO - 0243818841                         | MOHAMAD U BAGIGA UMARU - 0242132407 |
| AAA078    | AM-WSSCP-PAP-078    | PAUL AMOO                       | M                  | 49 | GHA-005729881-2      | Scrap dealer                             | 243818841                                    |               |                                    | 5°32'.41.66" N, 0°13' 35.25"W                |                                                    | ISSAH TAHIDU - 0249885325                      | YAKUBU ADAM - 0240372885            |

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| AAA079    | AM-WSSCP-PAP-079    | ISSAH TAHIDU                    | M                  | 32 | GHA-714427748-2      | Scrap dealer                             | 249885325                                    |               |                                    | 5°32'.41.66" N, 0°13' 35.25"W                |                                                    | ALHASSAN FUSEINI - 0244595936                  | PAUL AMOO - 0243818841             |
| AAA080    | AM-WSSCP-PAP-080    | YAKUBU ADAM                     | M                  | 47 | GHA-002199534-6      | Scrap dealer                             | 240372885                                    |               |                                    | 5°32'.41.66" N, 0°13' 35.25"W                |                                                    | ZIBLIM DAWUDA - 0246805573                     | MOHAMMED MOHAMMED - 0244935962     |
| AAA081    | AM-WSSCP-PAP-081    | AMINA ALHASSAN                  | F                  | 49 | GHA-712998506-7      | Food vendor with shed                    | 554324260                                    |               |                                    | 5°32'.41.66" N, 0°13' 35.25"W                |                                                    | SULEMANA ABDUL RASHID - 0242746104             | MOHAMADU BAGIGA UMARU - 242132407  |
| AAA082    | AM-WSSCP-PAP-082    | AHMED MOHAMMED                  | M                  | 57 | GHA-712364561-9      | Scrap dealer                             | 550432009                                    |               |                                    | 5°32' 06.23"N, 0°13' 84.05"W                 |                                                    | PAUL AMOO - 0243818841                         | ADAMS MUNIRU - 0244982396          |
| AAA083    | AM-WSSCP-PAP-083    | ADAMS MUNIRU                    | M                  | 31 | GHA-726812348-5      | Scrap dealer                             | 244982396                                    |               |                                    | 5°32' 68.23"N, 0°13' 03.76"W                 |                                                    | AHMED MOHAMMED - 0550432009                    | SULEMANA ABDUL RASHID - 0242746104 |
| AAA084    | AM-WSSCP-PAP-084    | MOHAMADU BAGIGA UMARU           | M                  | 43 | GHA-001915037-4      | Scrap dealer                             | 242132407                                    |               |                                    | 5°32' 49.76"N, 0°13' 33.55"W                 |                                                    | SULEMANA ABDUL RASHID - 0242746104             | ADAMS MUNIRU - 0244982396          |

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| AAA085    | AM-WSSCP-PAP-085    | OSMAN NURUDEEN                  | M                  | 43 | GHA-727934471-8      | Scrap dealer                             | 209538414                                    |               |                                    | 5°32' 06.16"N, 0°13' 24.64"W                 |                                                    | PAUL AMOO - 0243818841                         | SULEMANA ABDUL RASHID - 0242746104    |
| AAA086    | AM-WSSCP-PAP-086    | GAMBO AMINU                     | M                  | 43 | GHA-001172001-0      | Scrap dealer                             | 243224828                                    |               |                                    | 5°32' 13.76"N, 0°13' 75.76"W                 |                                                    | MOHAMAD U BAGIGA UMARU - 242132407             | ALHASSAN FUSEINI - 0244595936         |
| AAA087    | AM-WSSCP-PAP-087    | IDDRISU ZALIYA                  | F                  | 34 | GHA-715704013-0      | Food vendor                              | 543930347                                    |               |                                    | 5°32' 40.53"N, 0°13' 14.66"W                 |                                                    | GAMBO AMINU - 0243224828                       | MOHAMAD U BAGIGA UMARU - 242132407    |
| AAA088    | AM-WSSCP-PAP-088    | PETER AWUGBO                    | M                  | 29 | GHA-726070860-4      | Scrap dealer                             | 245706552                                    |               |                                    | 5°32' 19.76"N, 0°13' 34.96"W                 |                                                    | ISSAHAKU ABDUL MAJEED - 0556531051             | YAKUBU MOHAMMED ALHASSAN - 0244059726 |
| AAA089    | AM-WSSCP-PAP-089    | SHAIBU KUBRA                    | F                  | 26 | GHA-002047938-5      | Food vendor                              | 551883800                                    |               |                                    | 5°32' 29.56"N, 0°13' 34.64"W                 |                                                    | ISSAHAKU ABDUL MAJEED - 0556531051             | YAKUBU MOHAMMED ALHASSAN - 0244059726 |
| AAA090    | AM-WSSCP-PAP-090    | YAKUBU IDDRIS                   | M                  | 44 | GHA-725709297-8      |                                          | 245386588                                    |               |                                    | 5°32' 19.76"N,                               |                                                    | YAKUBU MOHAMMED ALHASSAN                       | MOHAMMED MOHAMMED                     |

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|           |                     |                                 |                    |    |                      |                                          |                                              |               |                                    | 0°13' 34.76"W                                |                                                    | - 0244059726                                   | ED - 0244935962                       |
| AAA091    | AM-WSSCP-PAP-091    | ALHASSAN FADILA                 | F                  | 38 | GHA-725492611-1      | Food vendor                              | 536317171                                    |               |                                    | 5°32' 47.43"N, 0°13' 24.66"W                 |                                                    | IDDRISU ZALIYA - 0543930347                    | MOHAMADU BAGIGA UMARU - 242132407     |
| AAA092    | AM-WSSCP-PAP-092    | MAMADU ZACKARIA                 | M                  | 41 | GHA-726640599-6      | Scrap dealer                             | 541608423                                    |               |                                    | 5°32' 23.07"N, 0°13' 35.10"W                 |                                                    | ISSAHAKU ABDUL MAJEED - 0556531051             | YAKUBU MOHAMMED ALHASSAN - 0244059726 |
| AAA093    | AM-WSSCP-PAP-093    | ABUKARI ZARIATU                 | F                  | 38 | GHA-715136086-7      | Food vendor                              | 247603067                                    |               |                                    | 5°32' 59.66"N, 0°13' 37.14"W                 |                                                    | YAKUBU MOHAMMED ALHASSAN - 0244059726          | MAMADU ZACKARIA - 0541608423          |
| AAA094    | AM-WSSCP-PAP-094    | ADAM ABUBAKAR                   | M                  | 53 | GHA-713056594-4      | Scrap dealer                             | 246274877                                    |               |                                    | 5°32' 23.16"N, 0°13' 22.13"W                 |                                                    | SHANI MORO MOHAMMED - 0246737412               | OSMAN SHAIBU - 0243391153             |
| AAA095    | AM-WSSCP-PAP-095    | MUSAH AMIDU                     | M                  | 40 | GHA-713144536-0      | Scrap dealer                             | 246882032                                    |               |                                    | 5°38' 31.23"N, 0°13' 14.86"W                 |                                                    | SHANI MORO MOHAMMED - 0246737412               | ADAM ABUBAKAR - 0246274877            |

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|-----------|---------------------|---------------------------------|--------------------|----|----------------------|------------------------------------------|----------------------------------------------|---------------|------------------------------------|----------------------------------------------|----------------------------------------------------|------------------------------------------------|--------------------------------|
| AAA096    | AM-WSSCP-PAP-096    | SHANI MORO MOHAMMED             | M                  | 45 | GHA-712746853-5      | Scrap dealer                             | 246737412                                    |               |                                    | 5°33' 34.76"N, 0°13' 36.18"W                 |                                                    | OSMAN SHAIBU - 0243391153                      | ADAM ABUBAKAR - 0246274877     |
| AAA097    | AM-WSSCP-PAP-097    | ADAMS ABDUL RAZAK               | M                  | 54 | GHA-712939330-3      | Scrap dealer                             | 246170926                                    |               |                                    | 5°32' 10.10"N, 0°13' 23.26"W                 |                                                    | ZIBLIM DAWUDA - 0246805573                     | MOHAMMED MOHAMMED - 0244935962 |
| AAA098    | AM-WSSCP-PAP-098    | MOHAMMED MOHAMMED               | M                  | 46 | GHA-712698365-1      | Scrap dealer                             | 244935962                                    |               |                                    | 5°32' 4233.26"N, 0°13' 21.46"W               |                                                    | ZIBLIM DAWUDA - 0246805573                     | SULE ADAM - 0242934679         |
| AAA099    | AM-WSSCP-PAP-099    | MUSTAPHA MOHAMMED               | M                  | 47 | GHA-002077918-6      | Scrap dealer                             | 244183844                                    |               |                                    | 5°32' 53.26"N, 0°13' 22.36"W                 |                                                    | ALHASSAN SAYIBU - 0246373756                   | ABDULLAH ALHASSAN - 0243950076 |
| AAA100    | AM-WSSCP-PAP-100    | ABDULLAH ALHASSAN               | M                  | 60 | GHA-716378347-0      |                                          | 243950076                                    |               |                                    | 5°32' 50.55"N, 0°13' 60.91"W                 |                                                    | MUSTAPHA MOHAMMED - 0244183844                 | ALHASSAN SAYIBU - 0246373756   |
| AAA101    | AM-WSSCP-PAP-101    | OSMAN SHAIBU                    | M                  | 47 | GHA-728734147-9      | Scrap dealer                             | 243391153                                    |               |                                    | 5°32' 50.16"N, 0°13' 41.96"W                 |                                                    | SHANI MORO MOHAMMED - 0246737412               | ADAM ABUBAKAR - 0246274877     |

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| AAA102    | AM-WSSCP-PAP-102    | AZURE ERNEST ADUGBIRE           | M                  | 24 | GHA-722817135-4      | Scrap dealer                             | 546535265                                    |               |                                    | 5°32' 41.40"N, 0°13' 12.16"W                 |                                                    | ABUKARI ZARIATU - 0247603067                   | MAMADU ZACKARIA - 0541608423 |
| AAA103    | AM-WSSCP-PAP-103    | ABDUL RAHAMAN IDDRISU           | M                  | 46 | GHA-728130906-6      | Scrap dealer                             | 248751097                                    |               |                                    | 5°32' 11.40"N, 0°13' 52.16"W                 |                                                    | ZIBLIM DAWUDA - 0246805573                     | YUSIF ALHASSAN - 0243033008  |
| AAA104    | AM-WSSCP-PAP-104    | SULEMANA AMINU                  | M                  | 45 | GHA-712686851-2      | Scrap dealer                             | 244241697                                    |               |                                    | 5°32' 31.40"N, 0°12' 12.16"W                 |                                                    | ZIBLIM DAWUDA - 0246805573                     | SULE ADAM - 0242934679       |

**Annex 3: Filled and signed Individual Compensation Agreement Forms (attached)**