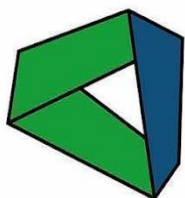


**CONSTRUCTION AND OPERATION OF A SOURCE-SEPARATED
ORGANIC WASTE COMPOSTING PLANT IN ACCRA, GHANA**

Stakeholder Engagement Plan

May, 2026



**C40 CITIES
FINANCE
FACILITY**

ABBREVIATIONS AND ACRONYMS

ACARP	Accra Compost and Recycling Plant	GIZ	Deutsche Gesellschaft für Internationale Zusammenarbeit
AMA	Accra Metropolitan Assembly	GoG	Government of Ghana
AoI	Area of Influence	GPI	Gender Parity Index
CFF	Cities Finance Facility	GRM	Grievance Redress Mechanism
CGSCs	Community Grievances and Surveillance Committees	ICGC	International Central Gospel Church
CSO	Civil Society Organization	IFC	International Financial Corporation
DOVVS U	Domestic Violence and Victims Support Unit	IRECO P	Integrated Recycling and Compost Plant
EA	Environmental Assessment	ISPs	Informal Service Providers
ECG	Electricity Company of Ghana	KBTH	Korle Bu Teaching Hospital
EHG	Environmental and Health Impact Assessment Group	LEAP	Local Empowerment Against Poverty
EIA	Environmental Impact Assessment	LI	Legislative Instrument
EIS	Environmental Impact Statement	LUSPA	Land Use and Spatial Planning Authority
EMP	Environmental Management Plan	MLNR	Ministry of Lands and Natural Resources
EPA	Environmental Protection Authority	MMDAs	Metropolitan, Municipal, and District Assemblies
ESIA	Environmental and Social Impact Assessment	NSRs	Noise Sensitive Receptors
ESIS	Environmental and Social Impact Statement	NGO	Non-governmental organization
ESMP	Environmental and Social Management Plan	PAPs	Project Affected Persons
FSPs	Formal Service Providers	PPRSD	Plant Protection Regulation Service Directorate
GAMA	Greater Accra Metropolitan Area	PPP	Public-Private Partnerships
GAMA	Greater Accra Metropolitan Area	PS	Performance Standard
GARCC	Greater Accra Regional Coordinating Council	RCC	Regional Coordinating Council
GBV	Gender Based Violence	SEA	Sexual Exploitation and Abuse
GH-NDC	Ghana's Updated Nationally Determined Contribution	SEP	Stakeholder Engagement Plan
GHS	Ghana Health Service	SH	Sexual Harassment

EXECUTIVE SUMMARY

Background

The Accra Metropolitan Assembly, with support from partners, proposes the development of a source separated organic waste composting plant to address growing waste management challenges in Accra. With organic waste forming a significant portion of municipal waste, the project aims to reduce landfill pressure, cut greenhouse gas emissions, and promote resource recovery through compost production. The initiative also supports climate action targets while creating livelihood opportunities, particularly within the informal waste sector.

The Stakeholder Engagement Plan establishes a structured and continuous approach to stakeholder participation throughout the project lifecycle. It ensures compliance with national regulations and international standards, including IFC Performance Standard 1 and AfDB Integrated Safeguards System and its relevant Operational Safeguards, and promotes inclusive consultation, information disclosure, and grievance management to support effective decision making and project sustainability.

Stakeholder Engagement Standards

Stakeholder engagement for the project is guided by national legislation, including the Environmental Protection (Environmental Assessment) Regulations, 2025 (LI 2504), which mandates public consultation, as well as the Data Protection Act, 2012 (Act 843) and the Right to Information Act, 2019 (Act 989), which ensure responsible data handling and access to information.

In addition, the project aligns with international standards such as the IFC Performance Standards and the African Development Bank's Integrated Safeguards System, particularly Operational Safeguard 10, which require structured stakeholder engagement, disclosure of environmental and social information, and the establishment of grievance redress mechanisms.

Project Description

The source-separated and composting plant project proposes source separation of municipal solid waste in Accra Metropolitan Assembly (AMA) and adjoining sub-metros (Osu Klottey, Korle Klottey, Okaikwei North, Okaikwei South, Ayawaso Central, Ayawaso East, Ayawaso North, Ayawaso West, Ablekuma Central, Ablekuma North, Ablekuma South, Ablekuma West) and the construction of a composting facility for source-separated organic waste treatment.

The location of the proposed composting facility will be in Jamestown, Ashiedu Keteke Sub-Metro of AMA (Lat. 5.543507° Long. -0.226150°), within the Greater Accra Region of Ghana. It will be located on a 1.77 ha land and adjacent to the Korle Lagoon to the west. The main inflows/inputs into the project will be raw material (organic waste and bulking materials), energy and water supplied by different actors in the downstream supply/value chain while the

main outflows will be compost, treated effluent, residual solid waste and gases expected to impact the upstream value chain.

Stakeholder Identification, Mapping and Analysis

A comprehensive stakeholder mapping and analysis was conducted to identify all relevant groups affected by or interested in the project. These include government agencies, private sector actors, informal and formal service providers, local communities, and vulnerable groups. The process considered stakeholder roles, interests, influence, and potential impacts. Table 1 shows the Stakeholder Identification Matrix (SIM) used to determine the relevance for involvement in the engagement process and to help highlight which areas to elicit inputs during the different phases of the project (identification, preparation, appraisal, implementation, completion and post-evaluation).

Table 1 *Stakeholder Identification Matrix*

Project Component and Activities	Stakeholder (S)	Project Phase
Displacement of scrap dealers and informal waste pickers	- Waste Pickers Association - WIEDO	Pre-construction and construction phases
Risk of conflict associated with resettlement of scrap dealers	- Abossey Okai International Central Gospel Church (ICGC) - Abossey Mosque - Community Members including vulnerable groups (e.g. women, elderly people, PWD, etc)	Preconstruction phase
Community and occupational health and safety	- Accra Metropolitan Assembly (AMA) and sub-metros - Jekora Ventures Ltd - Zoomlion (IRECOP) - Community Members - The Accra Compost and Recycling Plant (ACARP) - Accra School of Hygiene - Ghana National Fire Service (GNFS)	Preconstruction, construction and operation phases

	• Triple C Ghana Ltd • Bukom Boxing Arena • Korle Bu Teaching Hospital • Abossey Okai ICGC • Abossey Mosque	
Improper waste handling and disposal impacts	• AMA and sub-metros • Jekora Ventures Ltd • IRECOP • Water Research Institute (CSIR) • Communities including vulnerable groups (e.g. women, elderly people, PWD, etc) • ACARP • Accra School of Hygiene • Bukom Boxing Arena • Korle Bu Teaching Hospital	• Pre-construction, construction and operation phases
Threat to biodiversity	• Department of Parks and Gardens • Ghana Wildlife Division	• Pre-construction and construction phases
Impact on water resources	• Accra School of Hygiene • Triple C Ghana Ltd • Bukom Boxing Arena • Korle Bu Teaching Hospital • Environmental Service Providers Association (ESPA) • Ministry of Food and Agriculture (Plant Protection and Regulatory Services Directorate, (MoFA-PPRSD)) • Fisheries Commission	• Pre-construction and construction phases

	• Water Research Institute (CSIR) • ACARP • GNFS	
Traffic and accident risks	• Environmental Protection Authority (EPA) • Ghana Police - Korle District • Greater Accra Regional Coordinating Council (GARCC)	• Pre-construction and construction phases
Inefficient use of resources	• AMA and sub-metros • EPA • Water Research Institute (CSIR)	• Construction and operation phases
Climate risks	• NGO/CSO - Ghana Wildlife Society • EPA	• Pre-construction and construction phases
Labour rights infringement risks	• ESPA	• Construction and Operation Phases

Summary of Previous Stakeholder Engagement Activities

Extensive stakeholder consultations were undertaken using a variety of methods, including community forums, focus group discussions, interviews, and validation workshops. Engagements were conducted in local languages to ensure inclusivity and meaningful participation across different stakeholder groups.

During the consultations with the various stakeholders, diverse issues/concerns were raised by the participants. The table below (Table 2) presents highlights of the main concerns raised by participants and responses given:

Table 2 Highlights of Concerns Raised and Responses

Areas	Concerns	Responses
Waste Generation, Collection and Segregation Programmes/Space	Jekora Ventures Ltd's existing source-segregation program with clients provides a valuable case study for the proposed project and a potential partnership opportunity	The project will identify potential synergies with Jekora Ventures Ltd's existing program. This will be addressed during further stakeholder engagement at the project implementation stage

& Waste Handling Concerns	Concerns regarding space availability at the proposed site, including its capacity to accommodate all organic waste and the need for appropriate measures to handle by-products and operational waste.	The project will ensure sufficient space allocation for waste storage and processing by exploring space-sharing arrangements with IRECOP and other facilities. This will be addressed in the ESMP
	Proper waste segregation and collection systems are crucial for effective waste management	The project will establish clear waste acceptance criteria. Colour-coded bins within communities to facilitate waste segregation, coupled with incentives to encourage participation. Extensive public education on waste segregation will be conducted.
	Households may not segregate waste properly	
Displacement and loss of livelihood of waste pickers	Potential displacement of existing waste pickers and how they will be integrated into the new waste management system	The project will identify potential synergies with existing waste pickers and integrate their activities into the project Fair salaries and compensations will be ensured for all staff Waste pickers, including scrap dealers will be resettled to a suitable area Clear integration guidelines will be developed and members will be at liberty to decide whether to be on the project or not
Odour & Community Health & Safety, Occupational Health & Safety Concerns	Stench/odour is a major concern. Delayed waste collection can result in unpleasant odours and create unsanitary conditions, emphasizing the need for timely waste disposal services	The project will implement structured collection schedules to minimise waste decay and odours. This will be addressed in the ESMP
	Deterioration of access roads due to truck movement	The project will collaborate with relevant departments/authorities responsible for road maintenance.
	Direct exposure to public; e.g., uncovered waste transport causing environmental and health risks	The project will strengthen odour management systems; implement measures to control pollution/houseflies and other health hazards. This will be addressed in the ESMP.
Biodiversity Conservation	A green buffer should be established between the project and surrounding areas	A green buffer will be established
	The Korle Lagoon is degraded but still supports adapted bird species. Adopt	Management measures will be implemented to avoid further pollution,

	conservation-friendly policies, avoid further pollution and support lagoon restoration	support lagoon restoration and support adapted bird species. This will be addressed in the ESMP.
	Risk of hunting protected species (e.g., sea turtles, Hooded Vultures, Cattle Egrets) by staff. Enforce strict no-hunting policies and provide staff with education on wildlife co-existence	The project will implement ‘no-hunting rule’ within the project implementation area for both staff and non-staff. This will be addressed in the ESMP.
Social and Community Engagement & Support/Employment and Inclusion/Awareness Creation.	Local content must be factored into employment	The project will implement inclusive hiring policies, prioritizing local communities and marginalized groups
	Inclusion of Persons With Disability in employment: design inclusive roles and consider skills of PWDs in workforce integration.	
	Community development should be integrated in project implementation	Equitable trainings and capacity development programmes will ensure all staff have the needed capacity to work on the project.

Stakeholder Engagement Programme

Objectives Of the Stakeholder Engagement Programme

The objective of the Stakeholder Engagement Programme is to establish and maintain constructive relationships with all stakeholders throughout the project lifecycle. The programme seeks to ensure that stakeholders are informed about project activities, potential environmental and social risks and impacts, mitigation measures, and opportunities for participation in project decision making.

Definition of Engagement Approaches and Appropriate Tools

Engagement Approaches

The project will adopt a range of stakeholder engagement approaches to ensure effective communication, consultation, collaboration, and participation throughout the project lifecycle. The approaches have been designed to address the different levels of stakeholder interest, influence, accessibility, and vulnerability while ensuring that stakeholder concerns and expectations are adequately integrated into project decision making processes. The types of approaches that will be used include:

- **Information disclosure approach:** This will involve providing stakeholders with timely, accurate, and accessible information about the project and its potential environmental and social impacts. Information will be shared through

appropriate communication channels such as meetings, notices, reports, and digital platforms.

- **Consultation approach:** Stakeholders will be engaged to obtain their views, concerns, and recommendations regarding project activities and mitigation measures. Consultations will be conducted throughout the project lifecycle using methods such as meetings, focus group discussions, workshops, and interviews.
- **Participatory engagement approach:** This approach will promote stakeholder ownership and improves the sustainability and acceptance of project activities.
- **Collaborative engagement approach:** This focuses on working jointly with stakeholders to address project issues and develop appropriate solutions. It promotes partnerships, coordinated decision making, and shared responsibility among stakeholders.

Engagement Tools

A range of engagement tools will be utilised to support the various engagement approaches adopted for the project. The tools selected will depend on the stakeholder category, engagement objective, project phase, accessibility, literacy level, and sensitivity of the issue being addressed. The appropriate engagement tools:

- **Public meetings and community durbars:** Public meetings and community durbars will be used to engage large groups of stakeholders and communities on project activities, potential impacts, mitigation measures, and project updates.
- **Focus group discussions (FGDs):** FGDs will be used to facilitate detailed discussions with specific stakeholder groups, particularly vulnerable groups and project affected persons.
- **Key informant interviews (KIIs):** KIIs will be conducted with individuals and institutions possessing specialised knowledge or influence relevant to the project.
- **Workshops and stakeholder forums:** Workshops and stakeholder forums will be organised to facilitate technical discussions, collaborative planning, and information sharing.
- **Digital communication platforms:** Digital communication tools will be used to improve accessibility and timely information dissemination.

Strategy for Information Disclosure

Information will be disclosed through multiple communication channels including community meetings, public notices, stakeholder workshops, information leaflets, social media platforms, project reports, and direct consultations. Information will be communicated in English and local languages such as Ga and Twi to enhance accessibility and understanding among local communities.

Special attention will be given to vulnerable groups to ensure information is understandable, culturally appropriate, and accessible.

Strategy for Consultation

The consultation process will be implemented across all project phases, namely pre construction, construction, operation, and decommissioning phases. During construction and operation phases, consultations will address issues such as occupational and community health and safety, traffic management, labour infringement, waste management, grievance management, and environmental monitoring. During decommissioning, consultations will focus on rehabilitation activities, restoration measures, community safety, and closure related impacts.

Proposed Strategy for Taking into Account the Views of Vulnerable Groups

The project acknowledges that vulnerable groups may face barriers to participation in stakeholder engagement processes. To ensure inclusivity, targeted consultation approaches will be adopted to facilitate effective participation of women, persons with disabilities, elderly persons, informal workers, and the youth.

Grievance Mechanism

The project will adopt and enhance the existing grievance redress structure for MMDAs in Ghana. At the district assembly level in Ghana, complaint resolution involves a multi-tiered approach, leveraging established structures and community engagement to address grievances effectively. This includes community-level committees, collaboration with local authorities, and the formal mechanisms of the Assembly itself. Grievances are resolved or referred to the following levels depending on the nature of the complaint or dispute:

- Community Grievances and Surveillance Committees (CGSCs);
- Collaboration with Local Authorities and Stakeholders; and
- Formal Assembly Structures.

The contractors who will be involved in both the pre-construction and construction phases will be required to develop simple GRMs that align or feed into the existing GRM structures of the AMA. Construction and operational staff at the project level will maintain a grievance and conflict resolution log and report outcomes to the AMA and finally to the Greater Accra Regional Coordinating Council (GARCC) if required.

In line with IFC PS 1 and 2 and AfDB OS 1, 5 and 10, the project GRM will be accessible to all project-affected persons. Contractors will be required to establish worker-specific grievance mechanisms for their employees, coordinated with the project GRM to ensure oversight and consistency. All other external stakeholders, including informal waste pickers and affected

community members, will access the project GRM directly. Both the worker and community channels will ensure confidentiality, protection against retaliation, and transparent resolution of concerns. The transparent nature of resolving grievances and active involvement of local structures, i.e., CGSCs and MMDAs supported by the GARCC at the regional level will enable the GRM to address grievances amicably. This proven mechanism would be followed to facilitate all grievances or complaints at any point during the various phases of the project. The CGSCs within the various beneficiary MMDAs will be empowered to address any issues that may arise within their jurisdictions during the implementation of the project (especially with regards to the upstream activities i.e., source segregation, waste collection and haulage). Where a CGSC cannot resolve any grievance at the local MMDA level, it would be escalated to the GARCC who would coordinate with the relevant MMDA to find a solution to the complaint. The Public Relations and Social Welfare & Community Development Officers at the AMA will play a key role in coordinating the resolution of all grievances which will then be logged for record-keeping and tracking purposes.

Table 3 **Grievance Redress Roles**

Level	Agency/Individual	Grievance Redress Role
Regional, District	GARCC, AMA and other beneficiary/ participating MMDAs	● Establish GRMs via circulars and memoranda ● Provide operational guidelines for GRMs, e.g., source segregation and waste collection activities ● Designate necessary funds and staff to facilitate GRM operations ● Maintain databases on the status of grievance handling by Contractors and CGSCs ● Participate in GRM activities ● Monitoring grievance-handling processes by Contractors and CGSCs ● Coordinate the functions of CGSCs ● Provide capacity-building training to CGSC members
Contractors / CGSCs	Grievance Redress Committees	● Maintaining a list of those who are directly or indirectly affected by construction, operations, and maintenance work ● Addressing grievances excluding issues of GBV/SEA/SH

The grievance resolution framework consists of five key steps:

- Step 1: Reception and Registration;
- Step 2: Screening, Prioritization and Assignment;
- Step 3: Examination;
- Step 4: Grievance Closure; and
- Step 5: Appeals.

Monitoring and Reporting

Monitoring and reporting will be undertaken to track the effectiveness of stakeholder engagement activities and ensure that commitments are implemented. This will include documenting stakeholder interactions, tracking grievances, and assessing the implementation of engagement strategies.

Regular reporting will provide updates on project progress, environmental and social performance, and responses to stakeholder concerns, ensuring transparency, accountability, and continuous improvement throughout the project lifecycle.

The budget for operationalising the SEP is estimated at USD 43,000 as shown in Table 4.

Table 4 *Budget for the Stakeholder Engagement Plan*

Activity	Budget (\$)
Logistics (Flip chart, notepads, pens, stickers, whiteboard markers, etc.)	10,000
Printing of technical reports	5,000
Implementation of GM (staffing, communication, training, record keeping, and contingency)	8,000
Monitoring and Reporting	20,000
Total	43,000

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1.0 INTRODUCTION

1.1 Background

The Accra Metropolitan Assembly (AMA), with technical assistance from the C40 Cities Finance Facility (CFF), intends to implement a Municipal Solid Waste (MSW) Source Separation and Composting project as a strategic response to Accra's growing waste management challenges. With organic waste comprising more than 50% of total municipal waste generated in the city (according to a 2021 study conducted by the Greater Accra Resilient and Integrated Development Project), this initiative presents a transformative opportunity to adopt sustainable practices by converting organic waste into valuable compost. Prioritising composting is critical to reducing methane emissions, a potent greenhouse gas generated by decomposing organic matter in landfills and diverting organic materials from landfills to prolong their lifespan. Composting organic will significantly reduce the volume of waste requiring disposal by about 50%. For example, in 2019, Ghana's two main landfills in Kpone and Nsumia received a total of 688,482.65 metric tons of solid waste, (with 346,633.17 metric tons and 341,849.50 metric tons, respectively) meaning that only 344,241.33 metric tons would have reached the two landfills if composting was in place. It will extend the lifespan of the landfills and minimize the environmental problems associated with them. This initiative aligns with the city's climate action goal to reduce greenhouse gas emissions by 15% by 2030 and 45% by 2050, as outlined in the City's Climate Action Plan (CAP).

The proposed project will serve as a model for resource efficiency by transforming organic waste into nutrient-rich compost and prolonging the lifespan of landfills as well as creating additional livelihood opportunities for the urban poor. The compost product will enhance agricultural productivity, restore soil fertility, and reduce dependence on inorganic fertilizers, creating a direct link between urban waste management and agricultural resilience. The project is expected to create job opportunities across the waste supply chain, particularly for informal waste workers, by formalizing their roles in a more efficient and regulated waste management system. The project may also disrupt the existing waste supply chain, particularly with regards to organic waste from markets, which have been the constant source of animal feed for livestock farmers in and around AMA. The project will lead to the diversion of these wastes, causing shortfalls or competition between the project and livestock farmers. In addition to addressing waste management challenges, this initiative directly supports AMA's broader climate resilience strategy, contributing to the city's commitments under national and international frameworks for environmental sustainability.

The Accra Metropolitan Assembly (AMA), through the Ministry of Local Government, Chieftaincy and Religious Affairs (MLGCRA), is seeking financial support from the African Development Bank to implement the Municipal Solid Waste (MSW) Source Separation and Composting Project in Accra. In this regard, AMA aims to ensure that the project meets high environmental and social standards, aligning with financiers' expectations and complying with relevant international standards, including the African Development Bank's Integrated Safeguards System (ISS), the International Finance Corporation (IFC) Performance Standards

(PS), applicable guidelines, national and international legislation, and the labour conventions of the International Labour Organization (ILO).

1.2 Purpose and Objective of the SEP

Stakeholder participation is a vital component of environmental assessments. In Ghana, public consultation during project preparation is mandated under Section 27 of the Environmental Protection (Environmental Assessment) Regulations, 2025 LI 2504, which requires engagement with individuals or communities likely to be affected by the project.

Similarly, IFC Performance Standard 1 emphasizes the importance of early engagement with project-affected communities, particularly those in close proximity to project facilities who may face direct environmental, health, or livelihood impacts.

Stakeholder engagement is an ongoing process involving stakeholder analysis and planning, consultations, information disclosure, public participation, and reporting. The scope and intensity of engagement must align with the project's potential risks and impacts and its phase of development, as required by LI 2504, IFC PS1 and AfDB OS10.

The stakeholder engagement activities will be initiated at the early stages of all project development processes to be effective as an integral part of project preparation, planning and decision-making on risks and impacts. Effective consultation, participatory approaches and information disclosure promote stakeholder and community ownership and collaboration and help to:

- Establish a systematic approach to identifying and engaging stakeholders to help build and maintain constructive relationships, particularly with project-affected parties;
- Assess the level of stakeholder interests and support to enable their views to be taken into account in project design and social performance;
- Promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle;
- Ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely and appropriate manner and format; and
- Provide project-affected parties with accessible and inclusive means to raise issues and grievances, which will be appropriately responded to and grievances managed.

The SEP will also set out the guidelines for stakeholder identification, mapping and planning, as well as regulatory and institutional arrangements for the preparation of SEP and on-going stakeholder engagements during project implementation.

1.3 Report Organisation

This draft SEP report has been organized into eight (8) sections as follows:

- Chapter 1: Introduction
- Chapter 2: Stakeholder engagement standards

- Chapter 3: Project description
- Chapter 4: Stakeholder engagement activities
- Chapter 5: Stakeholder identification and analysis
- Chapter 6: Stakeholder engagement programme
- Chapter 7: Grievance mechanism
- Chapter 8: Monitoring and reporting

2.0 STAKEHOLDER ENGAGEMENT STANDARDS

2.1 National Requirements

The requirement for stakeholder participation in the impact assessment process is underscored in the Environmental Protection (Environmental Assessment) Regulations, 2025 (LI 2504) of Ghana.

The Data Protection Act, 2012 (Act 843) also sets out the rules and principles governing the collection, use, disclosure and care for personal data or information by a data controller or processor. Therefore, the right of individual's information will be respected and their information will not be disclosed without their consent. The Right to Information Act, 2019 (Act 989) also requires the right to access to information. It is meant to ensure Ghanaians have access to governance or official information from public offices on request and without request. Stakeholders have the right to ask for information on the program and will be briefed accordingly at the start of the engagement and throughout.

There is also a provision in LI 2504 for Public Hearing, when certain conditions are triggered, such as a strong adverse public reaction to a proposal, or where there is the need for resettlement, or the project could have extensive effects on the environment, people and communities.

The National Gender Policy overarching goal is to mainstream gender equality concerns into the national development processes by improving the social, legal, civic, political, economic and socio-cultural conditions of Ghanaians, particularly women, girls, children, the vulnerable and others with special needs, persons with disability and the marginalized. In this regard, WAFSRP will make provisions to ensure that activities under the program are focused and provide equal opportunity for all.

The roles and inputs of stakeholders in the case of the project will constitute an integral part of good industry and international best practice of the assessment process. This will inform the identification of stakeholders and the maintenance of good relationship, including information disclosure. Stakeholder involvement will also afford the opportunity to review the appropriateness of mitigation and other safeguards measures, and management and monitoring arrangements. Furthermore, it will support on-going awareness creation and stakeholder engagement prior to the development of any sub-project under the various components

2.2 IFC Performance Standards, 2012

Stakeholder engagement under IFC Performance Standard 1 is a continuous and structured process that spans the entire project life cycle. The standard emphasizes meaningful consultation that allows stakeholders to influence project decisions. It also requires the establishment of a grievance mechanism to address concerns in a fair and timely manner. Overall, stakeholder engagement under Performance Standard 1 promotes transparency, accountability, and inclusiveness, helping to manage risks and improve project outcomes.

2.3 Updated Integrated Safeguards System (ISS) of African Development Bank Group's

There are ten Operational Safeguards (OSs) under the AfDB Updated Integrated Safeguards System (ISS) of the African Development Bank. Operational Safeguard 1 requires projects to systematically identify, assess, and manage environmental and social risks and impacts throughout the entire project life cycle. This is achieved through the preparation and implementation of instruments such as Environmental and Social Impact Assessments, Environmental and Social Management Plans, and monitoring frameworks which require meaningful stakeholder engagement.

In addition, Operational Safeguard 10 mandates the development and implementation of Stakeholder Engagement Plans, the establishment of effective grievance redress mechanisms, and the timely disclosure of relevant environmental and social information. These requirements are intended to ensure inclusive participation, transparency, and accountability in project planning and implementation.

3.0 PROJECT DESCRIPTION

3.1 Project Location and Adjoining Land Uses

The proposed composting plant will be located in Jamestown, within the Ashiedu Keteke Sub-Metro of Accra Metropolitan Assembly, in the Greater Accra Region of Ghana. The facility will be located on a 1.77 ha parcel of land (refer to Appendix 4 for the site plan), situated adjacent to the Korle Lagoon to the west (Figure 3.1).

In line with IFC PS 1, the Area of Influence (AoI) for the proposed project includes both the project footprint and its broader impact zone. The primary AoI consists of the 1.77-hectare site, where all core project activities will be operated, managed, or occur.

Beyond the project footprint, the AoI extends to a 1-kilometre radius surrounding the site boundary. This includes areas that may experience indirect or unplanned but predictable impacts resulting from the project's development such as associated infrastructure or facilities that would not otherwise have been developed in the absence of the project. The AoI accounts for direct and indirect environmental (physical and biological), social, and cultural impacts, and incorporates neighbouring communities, sensitive receptors, and potential interaction zones.

Additionally, the AoI includes the broader administrative areas of the Accra Metropolitan Assembly, Ablekuma Central, Ablekuma North, Ablekuma South, Ablekuma West, Ayawaso Central, Ayawaso East, Ayawaso North, Ayawaso West, Okaikwei North, Okaikwei South, Korle Klottey and Osu Klottey from which source-separated organic waste will be collected and transported to the composting facility (Figure 3.2). This broader catchment is considered relevant for understanding upstream impacts and logistical implications related to waste sourcing and transportation.

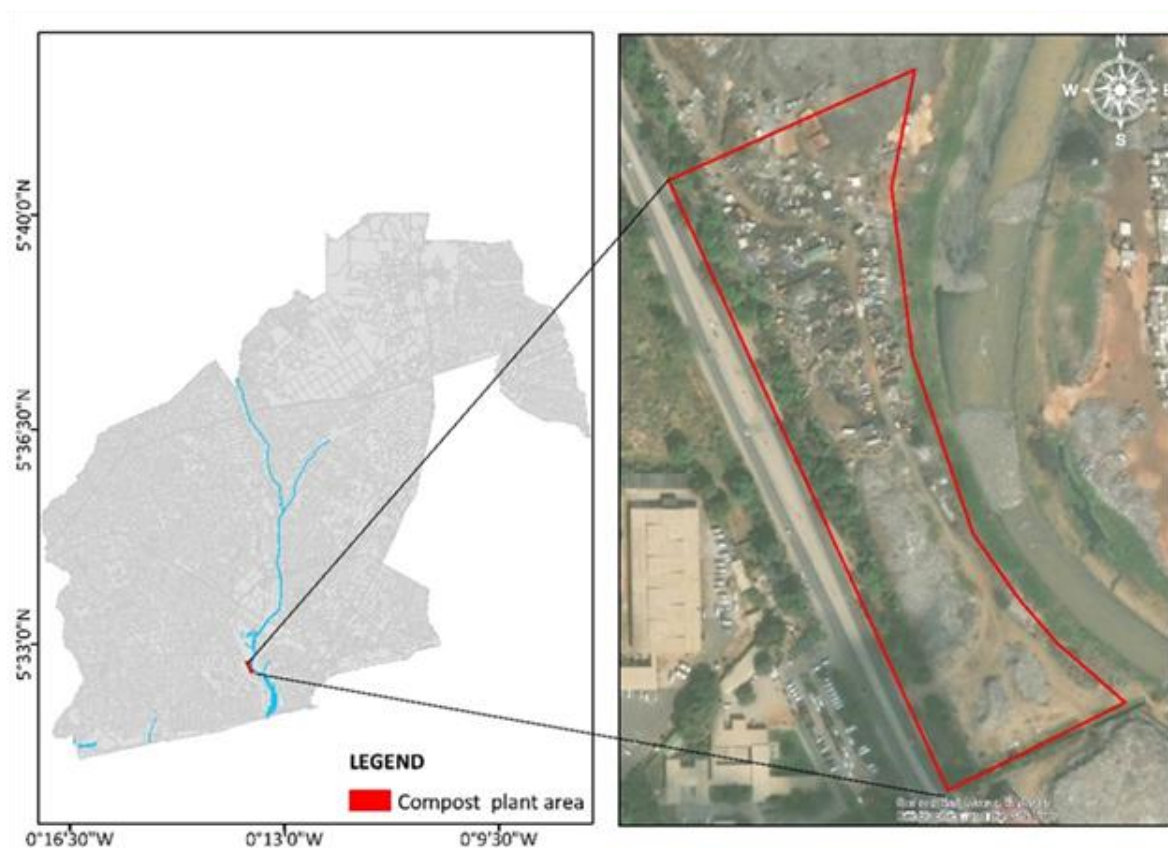


Figure 3.1 *Location of Proposed Compost Plant within the Accra Metropolitan Area*

For specific environmental considerations such as ecology, air quality, and noise, a 500-meter AoI is defined to evaluate potential localized impacts on flora, fauna, ecosystems, and emissions. This zone considers potential odour, gas, and particulate releases from the facility, as well as noise from operations that may affect adjacent communities and ecological systems based on IFC Standard 1.

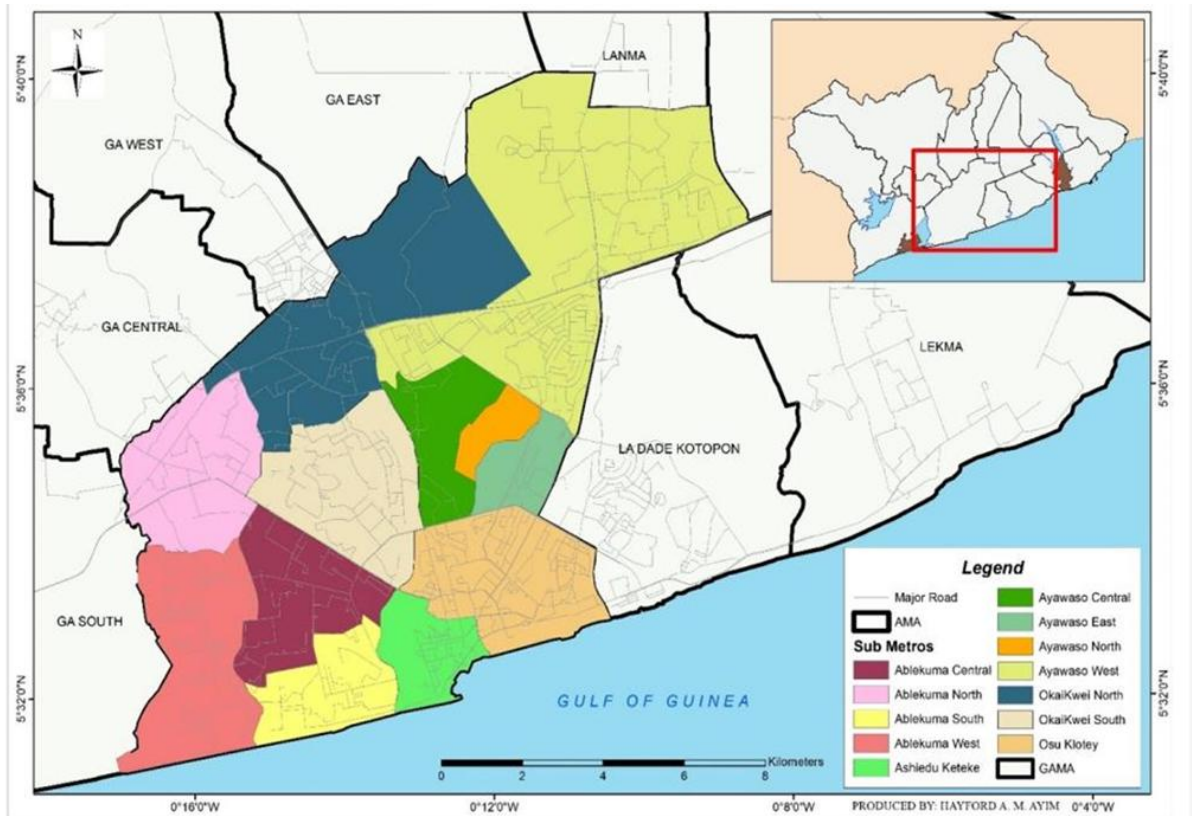


Figure 3. 2 *Project Area (colour coded) as defined by the City of Influence (Accra Metropolitan Assembly) (Source: City of Accra’s Waste Management Department, 2023)*

The proposed 1.77 ha site for the composting plant is predominantly unoccupied, showing signs of informal waste dumping, informal scrap dealings and degraded vegetation (Plate 3.1). Historically designated as part of an industrial zone, it aligns with the nearby IRECOP facility, owned and operated by Zoomlion. The land is mostly open, with patches of grass, shrubs, and bare ground, reflecting anthropogenic activities, including soil compaction, erosion, and litter accumulation. The IRECOP facility influences the site, with occasional spillover of solid waste and vehicular movement related to waste collection and recycling. Situated near the ecologically sensitive Korle Lagoon, the site has suffered from pollution, urban runoff, improper waste disposal, and encroachment. It lies in an area with little vegetation, bordered by an unapproved dumpsite to the south and a scrap yard to the north. The biodiversity in the area is low and limited to species adapted to urban environments.



Plate 3.1 *Current land use and activities of the project site in Jamestown*

3.1.1 Residential Settlements

Settlements including Agbogbloshie, Bukom, Korle Gonno, Korle Bu and Jamestown are among the communities closest to the project location; however, there are other communities in close proximity located within the project location that are in other sister municipalities. These areas are characterized by a high population density, informal housing structures, and limited access to basic urban infrastructure. Agbogbloshie, in particular, is renowned for its informal electronic waste recycling activities, contributing to environmental pollution and health risks.

3.1.2 Commercial/Economic Activities

Within a less than 5km radius hosts bustling markets, including the Agbogbloshie Market, a major hub for foodstuff trading and other informal commercial activities. Informal economic ventures such as scrap metal processing, small-scale trading, and artisanal work dominate the local economy.

3.1.3 Institutional Land Use

The Korle-Bu Teaching Hospital, a major health care institution, is located within the area, along with associated facilities such as the hospital mortuary and the Polyclinic. Educational institutions and places of worship are scattered throughout the settlements, reflecting the area's urban diversity.

3.1.4 Transport and Infrastructure

The site is accessible via two major urban roads, Ring Road West to the west and Guggisberg Avenue to the south, as well as informal roads arising out of convenience. However, traffic congestion and poor road conditions pose significant challenges in the project area. The Odaw River and its tributaries flow through the area, discharging into the Korle Lagoon, which lies to the east of the site. These water bodies are heavily polluted by untreated urban wastewater and solid waste.

3.2 Environmental Challenges

The vicinity is marked by significant environmental concerns, including air and water pollution from nearby informal waste processing activities and emissions from vehicular traffic. The Korle Lagoon and its immediate environment remain focal points of ecological degradation, with diminished aquatic life and extensive siltation. The project is likely to further increase the odour situation within the project area and further add to the already polluted Korle Lagoon and the Odaw River. During waste collection from generation points and temporal storage within communities, there could be further emission of odour and leachate which could affect the receiving environment as well as the social life of the people within such vicinities. These would likely attract flies and mice that are mostly associated with organic waste, which will further increase the risk of disease outbreaks within the communities. During final transportation of waste to the composting plant, there could be further emission of odour and leachate, as well as littering along the transportation routes. The priority E&S issues/risks that require stakeholder engagement from project identification to completion are presented in Table

Table 3. 1 *Description of Environmental and Social Impacts or Risks*

Impacts/Risks	Description of the Impacts/Risks
<i>Pre-Construction Phase</i>	
Risk of conflict associated with resettlement of scrap dealers	The risk of conflict is most pronounced due to the displacement of scrap dealers and informal waste workers who currently depend on the project site for their livelihoods, with potential sources of conflict including disagreements over compensation eligibility, perceived inadequacy of compensation amounts, lack of clarity regarding resettlement arrangements, and the absence of formal documentation among informal workers complicating the identification of affected persons and determination of entitlements. Inadequate consultation or communication could foster misinformation and mistrust between the project proponent and affected groups, increasing the likelihood of disputes, particularly given the vulnerability of those facing loss of income and displacement. The magnitude and overall effect of this impact are both considered high given the significant implications for the wellbeing of affected individuals, the impact is partially reversible through fair compensation and livelihood restoration measures though some residual dissatisfaction may remain, and consequently the likelihood and overall significance of conflict risks during the pre-construction phase are both assessed as high.
Community and Occupational Health, Safety and Security Risks	Activities are limited to site surveys, minor vegetation clearing, and preparatory works, meaning risks to both workers and the local community are minimal. Dust and emissions from occasional vehicle movement and small-scale earth disturbance are low in magnitude and short-term, though care must be taken given the sensitivity of the nearby Korle ecological site. Noise and vibration impacts are equally minor, arising only from survey equipment and access vehicles, with effects confined to the immediate site

	area and high reversibility. Worker accident risks such as slips, trips, or minor cuts are low in magnitude and short-lived, while odour and pest risks are negligible at this stage.
Improper waste handling and disposal impacts	Site surveys, minor vegetation clearing, and personnel mobilization, generate small quantities of non-hazardous waste such as packaging materials, food waste, and cleared vegetation. Given that the project site in Jamestown already exhibits degraded land conditions and informal waste dumping, the additional waste from this phase is unlikely to meaningfully worsen existing environmental conditions. The potential impact of any improper waste handling is low in magnitude, confined to the 1.77-hectare site footprint, and short-term in duration, as activities involve only a small, easily supervised workforce. Any improperly disposed waste could readily be collected and removed without long-term environmental consequences, making the impact highly reversible.
Threat to biodiversity	Pre-construction activities including site clearing, earthworks, trenching, and infrastructure assembly may disturb or remove habitats and affect flora and fauna species that rely on those ecosystems. However, the site is an abandoned field with no habitats of high importance, and specialized studies confirmed the absence of any globally protected species within the proposed project area. The two locally protected bird species identified, Cattle Egret and Yellow-billed Kite, are opportunistic feeders that will readily adapt to alternative food sources in other disturbed areas, meaning the loss of the foraging site is not anticipated to adversely affect biodiversity. The spread of invasive species such as <i>Leucaena leucocephala</i> , <i>Typha domingensis</i> , and <i>Azadirachta indica</i> as a result of site modification is similarly not anticipated. The likelihood of biodiversity loss is therefore rated medium, the effect is rated low, and the overall risk level is consequently considered low.
Impact on soil and water resources	Pre-construction activities such as site mobilisation, surveying, minor vegetation clearing, and early site preparation may cause limited disturbance to soil surfaces, though the project area is already significantly degraded due to its urbanised setting, informal waste disposal, and extensive prior human activity. Minor soil disturbance during this phase could lead to localised erosion or sediment movement, particularly during rainfall, with the possibility of sediments being transported through nearby drains into the Korle Lagoon and contributing marginally to its already high sediment loads. The magnitude of this impact is low, as only limited soil areas will be disturbed, with effects confined to the project footprint and its immediate surroundings. The impact is short-term in duration and highly reversible, as disturbed soil surfaces can be stabilised or restored once full construction commences. Overall, the likelihood, effect, and significance of impacts on soil and water resources during the pre-construction phase are all assessed as low.

Traffic and accident risks	Project related traffic will be limited to intermittent light vehicle movements by technical teams, surveyors, and consultants, generating minimal additional traffic compared to the already significant vehicular activity in the surrounding Accra Metropolitan area. These vehicles accessing the project site could introduce minor road safety risks for pedestrians and informal roadside users in the Jamestown area, though the small and irregular nature of vehicle trips will keep the overall level of risk limited. The magnitude, spatial extent, duration, and reversibility of potential traffic and accident impacts are all considered low, and consequently the overall likelihood, effect, and significance of traffic related risks during the pre-construction phase are assessed as low.
Inefficient use of resources	Resource use will be limited to small quantities of fuel, marking posts, temporary fencing, and other preparatory materials required for minor vegetation clearing, survey work, and site mobilisation. The potential for inefficient resource use exists if vehicles, equipment, or materials are not properly managed, though the small number of personnel and activities involved means the overall volume of resources consumed will remain low. The magnitude, spatial extent, duration, and reversibility of any resource inefficiency impacts are all considered low, and consequently the overall likelihood, effect, and significance of resource efficiency risks during the pre-construction phase are assessed as low.
Climate risks	Climate related risks are limited to the potential for heavy rainfall events, which are common during Accra's rainy seasons, to temporarily delay site preparation activities, affect site access, or cause minor soil erosion on exposed ground where vegetation has been cleared. Any such disruptions are expected to be short lived and manageable through adjustments to work schedules, with the magnitude, spatial extent, and duration of impacts all considered low and fully reversible through simple site management measures. Although the likelihood of rainfall related disruptions occurring is considered medium given Accra's seasonal variability, the overall effect remains low and consequently the overall significance of climate related risks during the pre-construction phase is assessed as low.
Labour rights infringement risks	Labour requirements will be limited to a small number of technical staff, surveyors, and support personnel involved in planning, mobilisation, and initial site preparation, though there remains a potential risk of labour rights concerns if workers are not engaged under clear and fair contractual arrangements. Risks may include the absence of written contracts, unclear terms of engagement, delayed payments, or inadequate communication of working conditions, particularly where temporary labour or subcontractors are engaged for short-term preparatory tasks. The magnitude, spatial extent, and duration of potential labour rights impacts are all considered low and largely reversible through improved documentation and communication,

	and consequently the overall likelihood, effect, and significance of labour rights risks during the pre-construction phase are assessed as low.
Construction Phase	
Risk of conflict associated with resettlement of scrap dealers	Resettlement and compensation issues which may have not been fully resolved prior to commencement of works, affected scrap dealers and informal waste workers could attempt to regain site access or disrupt construction activities, with conflicts potentially manifesting as protests, obstruction of access roads, or disputes with construction personnel, particularly where perceptions of unequal treatment in relocation arrangements create further grievances within the affected group. The magnitude of the impact is considered medium to high depending on the effectiveness of prior resettlement implementation, remaining localised to the project site, medium term in duration, and partially reversible through ongoing engagement and grievance redress mechanisms. The overall effect and likelihood of conflict during the construction phase are both considered medium, and consequently the overall significance of conflict risks during the construction phase is assessed as medium.
Community and Occupational Health, Safety and Security Risks	During the construction phase, dust and particulate emissions from construction works are of medium magnitude, extending across the site and immediately surrounding areas, with potential health implications for workers and impacts on nearby residential dwellings and businesses through dust deposition, while noise and vibration from machinery and generators similarly affect workers and nearby communities at medium magnitude with high reversibility once activities cease. Accident risks for workers, including slips, falls, cuts, and machinery related injuries, are high in magnitude and site wide in extent due to the potential severity of construction related injuries, with medium reversibility as serious injuries could have lasting consequences despite the availability of medical treatment. Pest activity from rodents and insects may temporarily increase due to water pooling and construction debris, though this risk is low to medium in magnitude, local in extent, and highly reversible through proper site housekeeping. Considering all risk categories together, the overall likelihood of adverse impacts during the construction phase is high, the overall effect is medium, and the overall significance of the construction phase is assessed as high.
Improper waste handling and disposal impacts	The generation of construction waste such as broken blocks, concrete debris, scrap metal, and packaging materials, alongside workers generated solid and liquid waste, presents a medium magnitude risk of land contamination, drainage obstruction, pest attraction, and public health concerns, particularly given the site's proximity to the already heavily polluted Korle Lagoon and Odaw River system. The overall effect and likelihood of improper waste handling impacts are both considered medium as construction activities involve numerous materials and a larger

	workforce, though impacts are largely reversible through proper waste collection and disposal at approved facilities, and consequently the overall significance of waste handling risks during the construction phase is assessed as medium.
Threat to biodiversity	Activities such as earthworks, construction traffic, and soil disturbance may remove patches of opportunistic vegetation, disturb hardy fauna species, and increase sediment laden runoff that could enter nearby drainage channels and ultimately affect water quality and aquatic organisms in the Korle Lagoon. Accidental spills of fuels, oils, construction materials and temporary noise disturbance may additionally affect birds and other wildlife along the lagoon margins, though given the already highly disturbed nature of the site, impacts are largely confined to the 1.77-hectare project area and a 1 km radius. The magnitude of biodiversity impacts is considered low, the duration is short term and limited to the 12-month construction period, impacts are largely reversible once construction ceases, and consequently while the likelihood is rated medium, the overall effect and significance of biodiversity impacts during the construction phase are both assessed as low.
Impact on soil and water resources	During the construction phase, intensive activities such as excavation, grading, foundation installation, and development of access roads and drainage infrastructure will expose soil surfaces and increase the potential for erosion, with disturbed soils risking being washed into nearby drainage channels that discharge into the already heavily polluted and sedimented Korle Lagoon. Construction machinery requiring fuel, lubricants, and hydraulic fluids also introduces the risk of accidental spills that could contaminate site soils and, if not promptly contained, be transported by runoff into nearby drainage systems, while improperly managed wastewater from worker sanitation and equipment cleaning may cause additional localised soil and water contamination. The magnitude and overall effect of impacts on soil and water resources during the construction phase are both considered medium, with spatial extent largely confined to the project site and nearby drainage pathways, duration corresponding to the medium-term construction period, and impacts largely reversible through proper site management, erosion controls, and spill remediation measures. The likelihood of such impacts occurring is considered medium given the inherent soil disturbance and fuel powered machinery involved in construction activities, and consequently the overall significance of impacts on soil and water resources during the construction phase is assessed as medium.
Traffic and accident risks	During the construction phase, traffic levels are expected to increase significantly due to regular truck movements delivering materials such as sand, cement, and steel, as well as construction equipment and worker vehicles, creating potential risks for pedestrians, motorcycles, taxis, and

	other road users sharing the densely populated streets of the Jamestown area. Heavy vehicles manoeuvring in narrow spaces, loading and unloading near the site, and carrying unsecured loads may lead to localised congestion, road obstructions, and debris hazards, with impacts extending beyond the project site to surrounding access roads and nearby intersections though remaining confined to the immediate urban area. The magnitude and overall effect of construction traffic risks are both considered medium, the impacts are largely reversible as traffic conditions will return to normal once construction is completed, and given the frequency of heavy vehicle movements and the nature of construction logistics, the likelihood of traffic related incidents is considered medium, resulting in an overall significance of traffic and accident risks during the construction phase assessed as medium.
‘Inefficient use of resources	Resource efficiency risks increase significantly as construction of the compost plant will require substantial quantities of materials such as cement, steel, gravel, and piping, alongside fuel for machinery and vehicles, and water for concrete mixing, dust suppression, and worker sanitation. Inefficiencies may arise from poor material storage leading to weather related losses, unnecessary fuel consumption from poorly maintained or idling equipment, and wasteful water use from temporary supply systems, all of which could increase operational costs, contribute to unnecessary emissions, and place additional pressure on Accra's already strained water supply. The magnitude and overall effect of resource efficiency risks during the construction phase are both considered medium, with impacts extending beyond the project site to indirectly affect supply chains and resource extraction activities elsewhere, lasting throughout the medium-term construction period, and largely reversible through improved resource management practices. Given the complex logistics and multiple contractors typically involved in construction projects, the likelihood of inefficiencies occurring is considered medium, and consequently the overall significance of resource efficiency risks during the construction phase is assessed as medium.
Climate risks	Heavy rainfall may affect excavation, concrete works, and material transportation, leading to water accumulation in trenches, soil erosion from exposed surfaces, and potential delays requiring additional drainage measures. Extreme heat conditions, common in Accra, may also reduce worker productivity and increase the risk of heat stress among those performing physically demanding tasks, while high temperatures and heavy rainfall may compromise the quality of certain construction processes such as concrete curing if not properly managed. The magnitude and overall effect of climate related risks during the construction phase are both considered medium, with impacts largely confined to the project site and construction logistics routes over a medium-term duration, and largely

	reversible through adjustments to construction schedules and site management practices. Given Accra's seasonal rainfall patterns and occasional extreme weather events, the likelihood of such disruptions is considered medium, and consequently the overall significance of climate related risks during the construction phase is assessed as medium.
Labour rights infringement risks	Activities such as earthworks, infrastructure installation, and equipment fitting will involve a larger workforce of skilled and unskilled labourers, technicians, and supervisory staff engaged across multiple contractors and subcontractors over several months. Potential risks include excessive working hours, delayed or unfair wages, lack of formal employment agreements, discriminatory hiring practices, inadequate grievance mechanisms, and informal recruitment arrangements that may expose workers, particularly those hired on a casual or daily basis, to unfair treatment. While child labour is not anticipated, ensuring all workers meet the legal minimum working age and are employed under conditions consistent with national labour laws remains important, as casual labour arrangements in the construction sector can lack sufficient protection. The magnitude and overall effect of labour rights risks during the construction phase are both considered medium, the likelihood of labour management challenges occurring is also medium given the common use of temporary labour arrangements, and consequently the overall significance of labour rights risks during the construction phase is assessed as medium.
Operation Phase	
Risk of conflict associated with resettlement of scrap dealers	During the operational phase, the risk of conflict related to resettlement is expected to reduce significantly if compensation and livelihood restoration measures have been adequately addressed in earlier phases, though residual risks may remain if affected individuals feel that promised support has not been delivered or if former informal workers attempt to re-enter the site to access waste materials for income generation. Perceptions of unfair distribution of employment opportunities at the facility may also create further dissatisfaction among previously affected individuals, potentially leading to conflicts with facility management or security personnel. The magnitude and overall effect of conflict risks during the operational phase are both considered low, with impacts localised to the project site, long term in duration, and largely reversible through continued engagement, fair employment practices, and effective grievance mechanisms, resulting in a low likelihood of conflict and an overall significance assessed as low.
Community and Occupational Health, Safety and Security Risks	During the operation phase, air quality risks arise from particulate matter, greenhouse gases including methane, nitrous oxide, and carbon dioxide, as well as ammonia and volatile organic compounds emitted from decomposing organic materials, while worker accident risks include slips, trips, cuts, bacterial infections from raw feedstocks, and long term exposure to heat stable endotoxins present in organic materials and finished composts

	that are not inactivated by composting temperatures. Noise and vibration from shredders, turners, conveyors, and increased truck movements are of medium magnitude and affect nearby communities, persisting long term during operational hours though highly reversible when machinery is not in use, while the existing noise environment already exceeds Ghana's daytime permissible limit of 75 dB(A) at three of the four sampled locations. Odour from decomposing organic matter is medium in magnitude, persists throughout the operational life of the plant, and may be dispersed by south westerly winds to communities and facilities within a 1 km radius, while pest related risks from flies and rodents affect the entire site with medium magnitude, long term duration, and medium reversibility through proper pest control measures. Considering all risk categories together, the overall likelihood of adverse impacts during the operation phase is high, the overall effect is high, and the overall significance of the operation phase is assessed as high.
Improper waste handling and disposal impacts	During the operation phase, the facility will process up to 466 tonnes of source separated organic waste per day, with improper feedstock handling potentially leading to compost quality issues, occupational hazards from inadequately removed contaminants, odour generation, pest attraction, and worker exposure to bioaerosols and biological agents associated with decomposing organic matter. Effluent management represents a significant risk, as leachate generated during composting must be treated through the facility's constructed wetlands and reverse osmosis system before discharge or reuse, and any malfunction or improper handling could introduce organic pollutants and nutrients into nearby drainage systems and the already heavily degraded Korle Lagoon. Worker generated domestic refuse and wastewater from staff facilities present a comparatively low magnitude risk, limited to the facility site, long term in duration, and highly reversible through proper housekeeping and waste collection systems. Considering all aspects of waste handling including feedstock management, worker generated waste, and effluent treatment, the overall effect and likelihood of improper waste handling impact during the operational phase are both assessed as high, and consequently the overall significance of waste handling and disposal risks during the operational phase is assessed as high.
Threat to biodiversity	Biodiversity risks will primarily relate to waste handling and facility management, as exposed organic waste could maintain or increase congregation of scavenging bird species such as the Cattle Egret and Hooded Vulture that already utilise the site, while poorly managed composting operations could generate leachate or nutrient rich runoff that reaches the Korle Lagoon and worsens aquatic biodiversity conditions. Given the already degraded baseline conditions, the magnitude of impact is assessed as low to moderate, with effects confined to the site and up to a 1 km radius, long term in duration throughout the operational life of the

	facility, and largely reversible through appropriate waste management, runoff control, and housekeeping practices. The likelihood of biodiversity impacts during the operational phase is considered medium, the overall effect is assessed as low, and consequently the overall significance of biodiversity risks during the operational phase is ranked low.
Impact on soil and water resources	The primary risks to soil and water resources arise from leachate generated during the decomposition of up to 466 tonnes of organic waste processed daily, which if not properly collected and treated could infiltrate surrounding soils, enter nearby drainage systems, and contribute to further eutrophication and water quality degradation in the already heavily polluted Korle Lagoon. Runoff from waste reception, processing, and storage areas, as well as accidental spills of fuel or lubricants from operational equipment, represent additional potential sources of soil and water contamination if appropriate containment and spill response procedures are not implemented. The facility's design incorporates containment measures including paved operational surfaces, controlled drainage systems, and dedicated leachate treatment infrastructure consisting of constructed wetlands and additional treatment processes intended to minimise direct contact between waste materials and surrounding soils and water bodies when properly maintained. The magnitude and overall effect of soil and water impacts during the operational phase are both considered medium, with impacts potentially extending beyond the site through drainage channels connected to the lagoon, long term in duration throughout the operational life of the plant, and largely reversible through effective leachate management and monitoring, resulting in an overall significance of medium.
Traffic and accident risks	During the operational phase, traffic and accident risks will primarily arise from the regular movement of waste collection trucks delivering approximately 466 tonnes of organic waste per day to the facility, with these vehicles interacting with pedestrians, informal vendors, public transport, and other road users along access routes in areas of high pedestrian activity surrounding markets and residential areas. Within the facility, workers face additional traffic related hazards from waste trucks manoeuvring during unloading and movement between processing areas, creating risks of collisions, reversing accidents, and injuries involving workers operating near moving vehicles. The magnitude and overall effect of operational traffic risks are both considered medium, with impacts extending to nearby access roads but remaining confined to the local transport network, long term in duration throughout the operational life of the facility, and reversible if plant operations cease, resulting in a medium likelihood of traffic related accidents and an overall significance of medium.
'Inefficient use of resources	During the operational phase, the facility will require continuous inputs of energy, water, and operational materials to support waste reception,

	shredding, composting, leachate management, and administrative activities, with inefficient operation of shredders, aeration systems, conveyors, and pumps potentially increasing operational costs and contributing indirectly to environmental impacts associated with electricity generation. Water use for equipment cleaning, moisture control in composting materials, worker sanitation, and leachate treatment processes presents additional efficiency concerns, particularly given the broader water supply pressures within Accra, while incoming waste streams containing plastics, metals, glass, or other contaminants may increase sorting requirements, reduce composting efficiency, and compromise the quality and marketability of the final compost product. Poor feedstock management, including inadequate control of moisture content, aeration, carbon to nitrogen balance, and temperature, may result in incomplete decomposition, longer processing times, and increased material rejection, meaning a portion of incoming organic waste may ultimately require disposal rather than being converted into useful compost. The magnitude and overall effect of resource efficiency risks during the operational phase are both considered medium, with impacts extending beyond the site to regional energy and water infrastructure systems, long term in duration throughout the operational life of the plant, and largely reversible through improvements in operational procedures and process monitoring, resulting in a medium likelihood of inefficiencies occurring and an overall significance of medium.
Climate risks	During the operational phase, climate related risks primarily arise from increased rainfall intensity, which may raise moisture levels in compost piles, slow biological decomposition, increase odour generation, and elevate leachate volumes requiring treatment, while extreme rainfall events could potentially overwhelm drainage infrastructure and cause water accumulation within operational areas of the facility. High ambient temperatures may increase evaporation rates and require more frequent moisture control and additional water use to maintain optimal composting conditions, though the facility also contributes indirectly to climate change mitigation by diverting organic waste from unmanaged disposal sites where it would otherwise generate methane. The magnitude and overall effect of climate related risks during the operational phase are both considered medium, with impacts primarily confined to the project site though capable of indirectly affecting broader waste management operations in Accra, long term in duration throughout the operational life of the facility, and largely manageable through appropriate operational controls, drainage management, and process monitoring. Given the increasing variability in rainfall patterns and temperature conditions in the region, the likelihood of climate related operational challenges is considered medium, and

	consequently the overall significance of climate related risks during the operational phase is assessed as medium.
Labour rights infringement risks	The compost plant will employ a permanent workforce of equipment operators, technicians, waste handlers, supervisors, and administrative staff on a continuous basis, with potential labour rights risks including unfair employment conditions, inadequate wages, lack of job security for contract workers, insufficient grievance mechanisms, and discriminatory employment practices affecting both direct employees and workers engaged by waste collection contractors supplying feedstock to the facility. Ensuring equal employment opportunities, fair treatment regardless of gender or background, and compliance with national labour regulations will be important ongoing considerations, particularly given that poor working conditions in waste handling and composting operations could affect workers over a long period if labour management systems are not properly established. The magnitude and overall effect of labour rights risks during the operational phase are both considered medium, with impacts limited primarily to facility employees and associated contractors, long term in duration throughout the operational life of the plant, and largely reversible through effective labour policies and grievance mechanisms, resulting in a medium likelihood of labour related concerns arising and an overall significance of medium.

3.3 Key Project Components

3.3.1 Project Design and Land Use Requirements

The proposed project will be developed into an integrated facility featuring a well-organized landscape layout (Figure 3.3 and 3.4). The proposed compost facility will employ covered aerated static pile (CASP) composting technology occupying an area of 1.77 ha, with a capacity of 466 tonnes of organic waste per day. The production process involves pre-processing the organic waste received by further sorting and shredding into pieces; the pre-processed waste is piled and composted; finished compost is post-processed by sieving and packaging of finished compost and before storage. The key infrastructure components include:

- **Administrative Facilities:** The “main administrative building” will be for operations management and will house all staff. There will be staff offices, staff common rooms, staff changing and restrooms, storage rooms, meeting rooms, and a kitchenette. These spaces will be divided in two storeys high (a ground and first floor).
- **Waste Processing Units:** The units will consist of a waste receiving and pre-processing area; a composting area; a curing and maturation area; and a packaging area for finished compost. The waste receiving and pre-processing will occur in the “Pre-processing Building” of the facility. The building will contain two pre shredders linked to two chain conveyors taking the shredded organic waste into a trommel screen. The material from the trommel screen will then be transported on moving conveyors to trucks that will transport to the next stage of the process i.e. forming the compost pile. The “Composting area” will have 12 chambers for forming compost piles. Each chamber

will have an aeration system, sprinklers and monitoring equipment. Similarly, there will be 12 chambers in the “curing and maturation area” for the final stages of the composting before storage in the “storage area”. The storage area will also have 9 chambers for the piles. The compost packaging will occur in the “Compost packaging unit” which will house a receiving funnel attached to a screw conveyor that will bring the matured compost into a packaging unit. The packaged compost will roll down a roller conveyor for distribution.

- **Leachate Management System:** The leachate treatment system will have 4 constructed wetlands being fed by a leachate pumping station. There will be a treated leachate pumping station, leachate storage tank, and reverse osmosis (RO) treatment system in place to further polish the effluent. Treated effluent will be discharged or reused in the facility.
- **Support Infrastructure:** The support infrastructure will include air blower building, a garage area, an electrical building, and a water tank. There will be 10 blower units installed with a future capacity to double the numbers to 20. These blowers will be connected to the electrical system in the “electrical building.” The blowers will supply air through pipes to the composting piles. The “garage area” will be for vehicle maintenance, repairs, and washing area. It will also have storage rooms for supplies.
- **Utilities and Sustainability Features:** There will be sewage collection pipes, water supply pipes, air pressure pipes, and a 2,677 m² solar panel area for renewable energy.
- **Security and Access:** This will include a security post, weighbridge, and parking area for staff and visitors.
- **Stormwater Management System:** The facility will have three main stormwater drainage systems, collecting and directing stormwater through a treatment receptor to discharge into the Odaw River.

Figure 3.4 illustrates an artistic impression (3D) of the proposed facility.



Figure 3. 3 General Landscape Layout. (Source: GIZ/HYDROPLAN (2024))

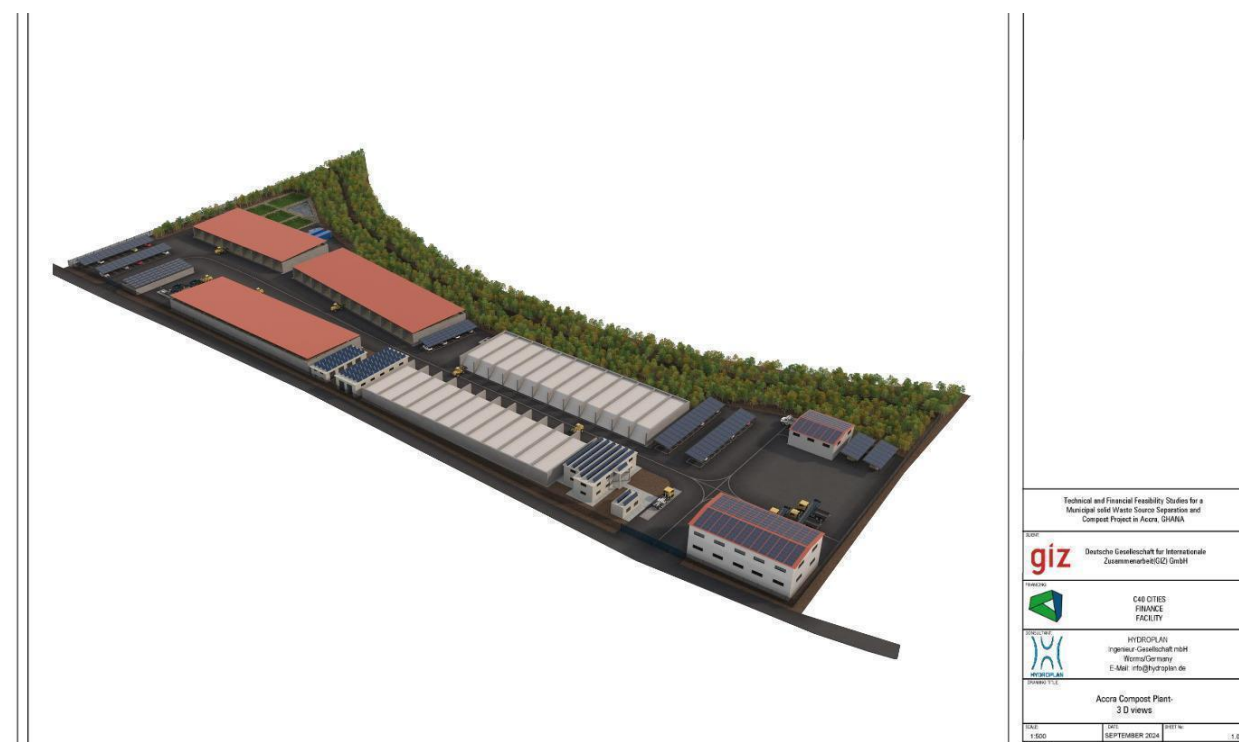


Figure 3. 4 3D View of Proposed Compost Plant Facility. (Source: GIZ/HYDROPLAN (2024))

Figures 3.5 and 3.6 illustrate the layout of the compost packaging unit and sections of the main administrative building, respectively.

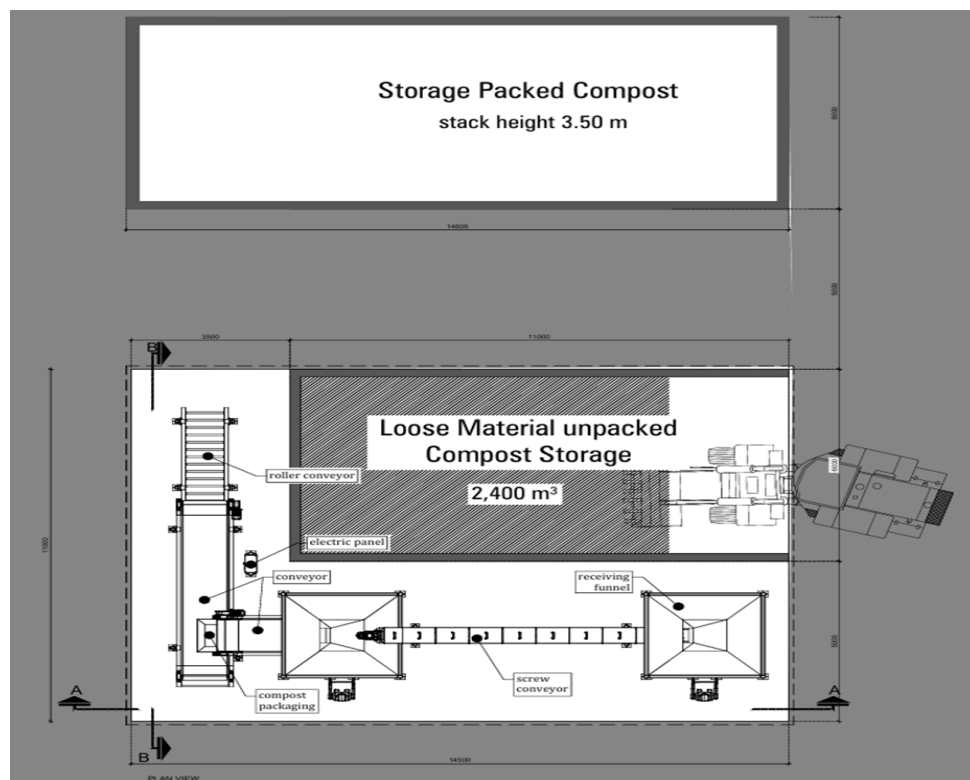


Figure 3. 5 *Compost Packaging Unit Layout. (Source: GIZ/HYDROPLAN (2024))*

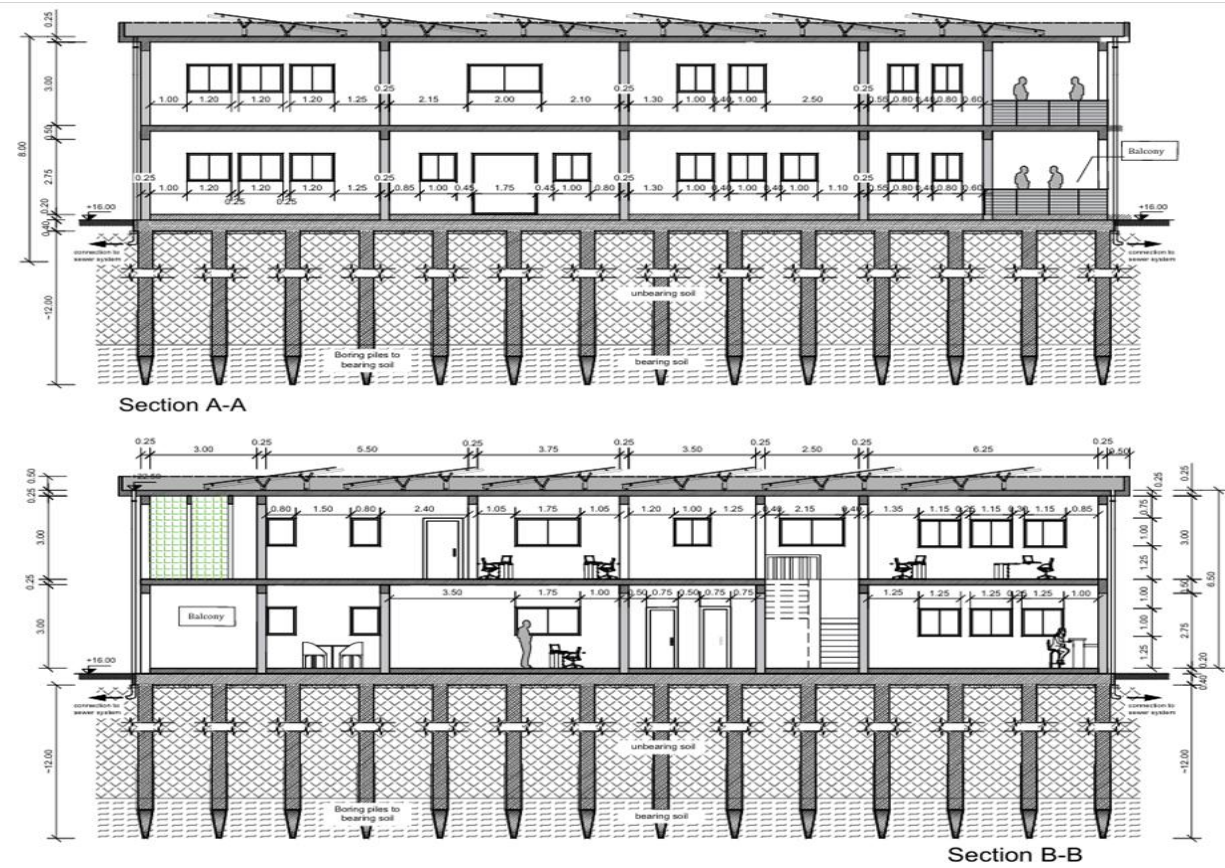


Figure 3.6 Main Administrative Building Sections. (Source: GIZ/HYDROPLAN (2024))

3.3.2 Project Components & Processes

The main material inputs for the proposed project will be source-separated organic waste, water and energy sources (electricity, solar and diesel), while the main outputs will be the product (compost), some residual solid waste, wastewater (treated effluent), and other emissions. Figure 3.7 Shows the environmental flow diagram of the proposed project.

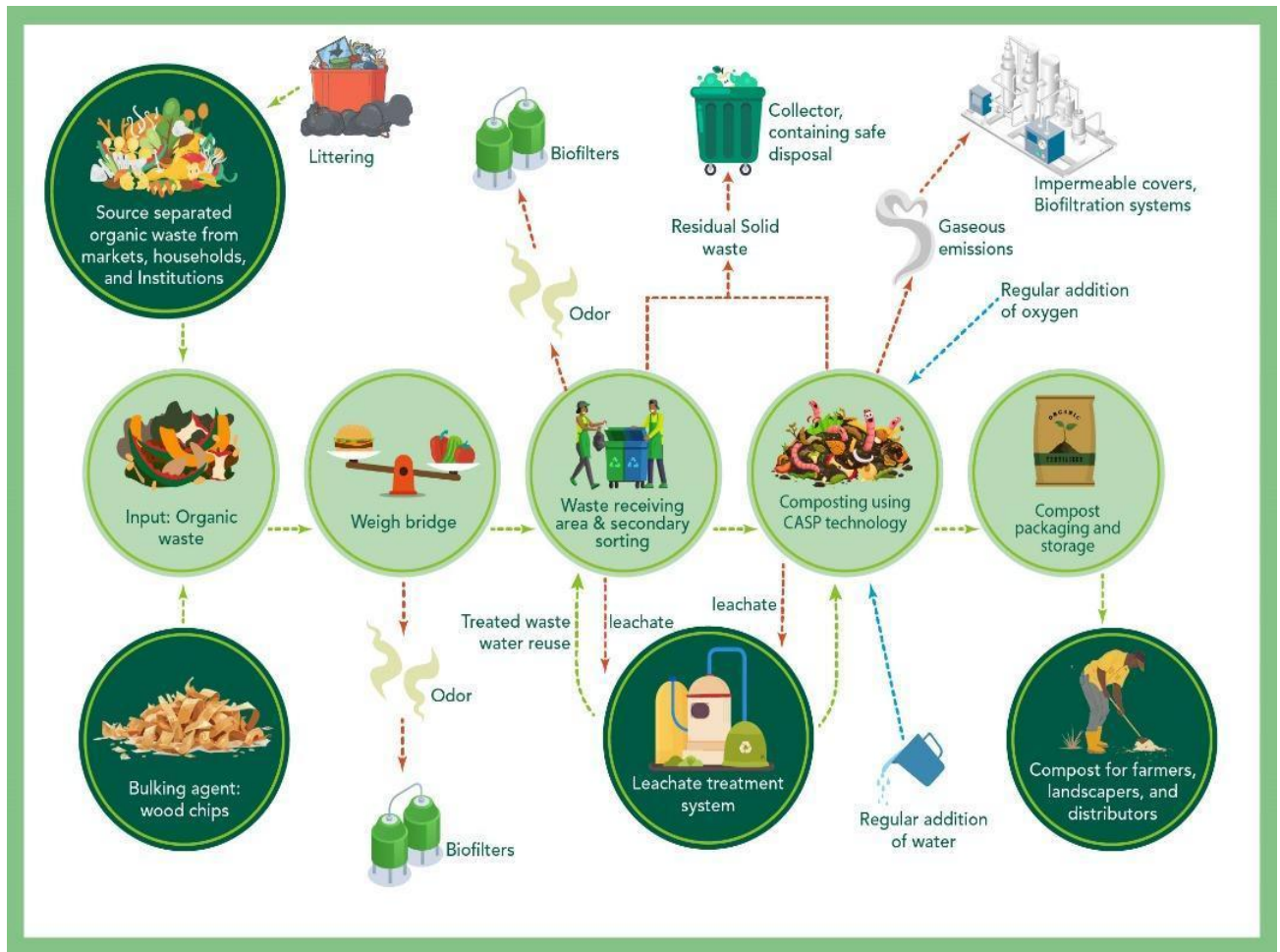


Figure 3. 7 *Process flow diagram of the proposed facility*

3.3.3 Waste Reception and Pre-Processing

Primary source-separated organic waste will be received at the plant on a daily basis. The trucks bringing the load will be weighed at the weighbridge on entering the facility to determine the tonnage of waste received. Based on the design capacity, the facility will be processing organic waste amounting to 466 tonnes per day from the metropolis. From the weighbridge, the trucks will deliver the waste to the pre-processing building where the pre shredder will shred the waste and move it through the conveyor system to the plant trucks that will take it to the composting chambers. Secondary sorting will be done at the pre-shredder stage to remove any inert materials and other foreign materials that may have escaped the primary source-separation prior. This will be the quality control/assurance step to ensure raw materials are of the highest quality or purity. Based on the initial characterization of MSW in Accra, the organic waste will not require air drying to remove excess moisture before transporting to the composting area. The processes will be mechanized.

3.3.4 Composting Processes

The organic waste, after going through the pre-processing above, will be arranged in the 12 chambers for compost piles. Each pile will be connected with aerators/blowers to supply air (oxygen), sprinklers to supply water for moisture adjustment, and temperature monitoring

devices to ensure optimal conditions will be maintained for effective composting. The piles will be covered with breathable materials in a process referred to as a CASP method. The active composting will occur at this stage, and it will take place in less than 40 days. This is where active breakdown of the waste by microorganisms will occur, causing a rise in temperature from ambient temperature range to 50-60°C. Turning of the piles will not be required. This method will effectively reduce odours and emissions. Technicians and key staff of the facility will be constantly monitoring the processes from start to the end.

3.3.5 Curing and Maturation

After the active composting phase above is completed, the material will be transported by means of front-end loader trucks to continue the process in the 12 curing and maturation chambers. In this chamber, the composting material will enter into the second mesophilic stages where temperature will begin to drop to below 50°C as the material begins to stabilize and it is turning into humus. This process will also be monitored by adjusting moisture and measuring the temperature of the piles. The compost temperature will gradually reduce to ambient temperatures and that will signify the end of the composting process. This process is continuously monitored to enhance quality.

3.3.6 Storage

The matured composts will be moved from the curing and maturation chambers to the 9 storage chambers. In storage, the matured compost will be air dried, awaiting packaging.

3.3.7 Packaging and Distribution

The matured final compost will be bagged using an installed compost packaging unit. This will be a fully mechanized process leading to bagged bags ready for distribution or sales.

3.3.8 Leachate Management

Leachate from the end-to-end composting processes will be treated to comply with Ghana Standards for effluent discharge (GS 1212:2019). Treatment will include collecting all leachate into a tank and pumping the leachate through constructed wetland systems, which will make use of physical, chemical, and biological processes to remove pollutants (total suspended solids, total dissolved solids, nutrients, trace metals, and organic matter). An additional reverse osmosis treatment step will be included after the constructed wetlands to meet EPA effluent discharge guidelines. The treated effluent will be discharged into the lagoon or redirected for reuse with the facility. The stormwater in the facility will be managed through a constructed drainage system, which will open at three places into the lagoon to prevent flooding in the facility. The treated leachate and stormwater in the facility will be reused within the facility where possible to close water and other resource loops.

Leachate Characteristics After Treatment

For the CASP method of composting, the process is isolated from any external factors, and parameters such as moisture content, odour and aeration are well controlled. From literature, the expected leachate characteristics of the municipal organic waste composting using CASP method is presented in Table 3.2.

Treatment Efficiency of constructed wetlands

Constructed wetland system was capable of efficiently removing BOD₅ (87.3%), COD (74.5%), ammonia (91.5%), nitrate (87.9%), total nitrogen (87.8%), total suspended solids (85.5%), and heavy metals (ranging from 70 to 90%) from the composting leachate (Bakshoodeh et al 2017).

Based on the efficiency of treatment, we are expecting the characteristics of treated effluent from the composting facility to as stated in Table 3.3. This could be diluted during the rainy season with storm water or run off.

Table 3. 2 Expected Leachate Characteristics of CASP Composting

pH	Conductivity (mS/cm)	TSS (g/L)	TVS (g/L)	Cl (mg/L)	Cd (mg/L)	Cu (mg/L)	Ni (mg/L)	Pb (mg/L)	Zn (mg/L)	COD (g/L)	BOD (g/L)	TKN (mg/L)	NH4 (mg/L)	TP (mg/L)	PO4 (mg/L)
5.9-8.1	1.4-36.7	0.35-23.4	1.78-14.4	2910-3210	0.01-0.17	<0.01-1.5	0.05-1.47	0.02-1.07	0.5-8.2	8.5-42.8	0.67-7.90	350-3213	250-2275	-	12-85

Table 3. 3 Expected Characteristics of Treated Effluent Before

pH	Conductivity (mS/cm)	TSS (g/L)	TVS (g/L)	Cl (mg/L)	Cd (mg/L)	Cu (mg/L)	Ni (mg/L)	Pb (mg/L)	Zn (mg/L)	COD (g/L)	BOD (g/L)	TKN (mg/L)	NH4 (mg/L)	TP (mg/L)	PO4 (mg/L)
5.9-8.1	0.42-11.01	0.03-3.39	0.26-2.09	291-321	<0.01-0.02	<0.01-0.15	<0.01-0.15	<0.01-0.17	0.05-0.82	2.17-10.91	0.09-1.00	42.7-391.9	21.3-193.4	-	12-85

4.0 STAKEHOLDER IDENTIFICATION, MAPPING AND ANALYSIS

4.1 Stakeholder Mapping

A stakeholder mapping categorisation and analysis has been conducted to identify key stakeholder groups and organisations and the nature of their relevance and role to the issues linked to the project, based on the following criteria:

- Those directly and indirectly involved in project implementation and value chain;
- Those whose independent activities overlap with the Project;
- Those potentially impacted directly or indirectly by the Project;
- Those with an interest or influence over the Project; and
- Any other relevant stakeholders.

With respect to resettlement, stakeholders identified would be suited to comment on land-take and access restriction issues and compensation for implementation of the project.

The relevant stakeholder groups identified included project affected persons (PAPs), government and regulatory bodies (ministries and government agencies), private sector, associations and companies/industries, informal service providers, formal service providers, communities and local stakeholders, public health and educational institutions, research institutions and non-governmental organisations (NGOs)/civil society organisations (CSO) and development partners.

The key stakeholders identified have been listed under the respective categories in Table 4.1. In identifying the stakeholders, an initial prospective list was prepared by matching the main components of the project, as well as potential impacts and baseline areas with the various stakeholder groups in a Stakeholder Identification Matrix (SIM). Table 4.2 shows the SIM used to determine the relevance for involvement in the engagement process and to help highlight which areas to elicit inputs.

Table 4.1 *Categorisation of Stakeholders*

Stakeholder Categories & Group	Connection to the Project
Government & Regulatory Bodies (Ministries and Government Agencies)	
Ministry of Local Government, Chieftaincy and Religious Affairs (Community Development Directorate & Environmental Health and Sanitation Directorate)	Provides overarching policy direction, coordination, and support for local governance, sanitation and waste management initiatives. NB: In January 2025, the Ministry of Sanitation and Water Resources was dissolved, and its functions were absorbed by the Environmental Health and Sanitation Directorate under the Ministry of Local Government, Chieftaincy, and Religious Affairs.
Ministry of Fisheries and Aquaculture Development (Fisheries Commission)	Ensures no negative impact on water bodies that may affect fisheries resources.

Stakeholder Categories & Group	Connection to the Project
Ministry of Food and Agriculture (Plant Protection and Regulatory Services Directorate (PPRSD), and Crop Services Directorate)	A key government institution in Ghana which oversees policies and programmes to promote agricultural growth and food security. Specifically, the PPRSD advocates for compost use and enforces plant protection regulations, while the Crop Services Directorate ensures the compost plant's outputs align with national agricultural priorities, soil health, and sustainable farming practices.
Accra Metropolitan Assembly (AMA) (Waste Management Department, Planning Department, Agric Department, Public Health Department, Works Department, Social Welfare and Community Development, Ashiedu Keteke Sub-Metro, Ablekuma South Sub-Metro, Okaikoi South Sub-Metro]	AMA is the project proponent and key local authority overseeing waste management and project beneficiaries and communities. AMA seeks to ensure that the project aligns with the Accra Climate Action Plan and regulatory Compliance
Greater Accra Regional Coordinating Council (GARCC)	GARCC is responsible for coordinating regional and district-level institutions within the Greater Accra Region, including the AMA. It oversees the implementation of government policies and ensures effective coordination among stakeholders in regional development projects.
Environmental Protection Authority (EPA)	Regulatory body enforcing environmental laws, including EPA Act 1124 and LI 2504; issuing environmental permits for the project.
Forestry Commission (Ghana Wildlife Division (GWD) and Forest Service Division (FSD))	Responsible for managing fauna resources in the country. They are responsible for ensuring the conservation and protection of wild animals including birds, mammals, reptiles, insects, and amphibians of conservation concern. Responsible for managing plant resources in Ghana. Ensures compliance with forest conservation regulations if applicable.
Department of Parks and Gardens (DPG)	DPG oversees the development and maintenance of public green spaces in Ghana. In relation to the proposed project, DPG serves as a key end-user of the compost, supporting sustainable landscaping and contributing to the project's circular economy and environmental goals.
Ghana National Fire Service (GNFS) - Accra Central Division	Engaging the GNFS will help verify the adequacy of fire control measures, provide fire safety training for staff, and minimize potential hazards, ensure the safety of the facility, workers, and surrounding communities.
Ghana Police - Korle District	Engaging the Ghana Police - Korle District will help address potential security risks, manage safety concerns for local communities, and ensure smooth interactions with local authorities. The police can also play a key role in emergency response preparedness and coordinating with stakeholders to mitigate any disputes or safety issues that may arise during the project.
Private Sector, Associations & Companies/Industries	

Stakeholder Categories & Group	Connection to the Project
Environmental Service Providers Association (ESPA)	Represents waste management service providers; ensures industry compliance and standards.
Restaurant and Eatery Associations Example: Makola market food sellers, Kaneshie Market food sellers, Mall Food Operators, etc.	Key organic waste generators; potential participants in waste separation initiatives.
The Accra Compost and Recycling Plant (ACARP)	A waste management facility in Accra which focuses on managing municipal solid waste and promoting environmental sustainability by converting organic waste into compost and recyclable materials. Engaging ACARP is crucial to harness their expertise, resources, and experience in producing high-quality compost.
Triple C Ghana Ltd	Triple C Ghana Ltd, located approximately 1km south-east of the project site, operates within the miscellaneous nondurable goods wholesale sector. As a key receptor within the project's Area of Influence, their environmental and social feedback, informed by years of operation in the area, was critical to understanding potential project impacts and ensuring responsive mitigation measures.
Informal Service Providers (ISPs)	
ISPs include street sweepers and waste collectors/scrap dealers, tricycle or motorbike waste collectors "Aboboyaa", private waste management groups, etc.	ISPs facilitate source separation and collection of organic waste; ensure safe and fair working conditions. The existing project site is currently occupied by the Mortuary Road Scrap Dealers Association who are identified for consultation regarding the risks of displacement (both physical and economic) and measures to minimize or mitigate these impacts.
Formal Service Providers (FSPs)	
FSPs include: Zoomlion (IRECOP) and Jekora Ventures	Zoomlion Ghana Limited, one of the largest waste management companies in Ghana, offers waste collection, disposal, recycling, and sanitation services across Accra and beyond. Its subsidiary, IRECOP, enhances the operational efficiency and sustainability of the AMA compost plant through expertise in waste management and recycling. The proximity of the IRECOP and AMA compost sites facilitate seamless collaboration, supporting Accra's sustainability goals. Jekora Ventures Limited also plays a key role in waste management, focusing on the collection, transportation, and recycling of both solid and organic waste in Accra. Overall, FSPs are vital to the efficiency, scalability, and sustainability of the AMA compost plant, ensuring effective management and conversion of organic waste into valuable compost for agricultural and environmental use.
Communities and Local Stakeholders	
Traditional Authorities (Sempe Korle-Bu Mantse, Korle Wulormor, Jamestown Mantse, and Gbese Mantse)	Traditional Authorities provide support for cultural and local governance and facilitate community engagement.

Stakeholder Categories & Group	Connection to the Project
	NB: The Jamestown traditional authority was without a ruler due to ongoing chieftaincy disputes.
Project affected communities, individual residents, (non) organised groups, vulnerable groups (e.g. women, elderly people, PWD, etc). Communities Identified within 1km radius of the project site include: Korle Gonno, Korle-Bu, Mudor, Jamestown, Bukom, Old Fadama, Agbogbloshie, are largely low-income communities Residents' associations of selected high-income communities such as Cantonments, Dzorwulu, etc.	Local community representatives play a crucial role in informing communities directly or indirectly impacted by the proposed project. It is essential to raise awareness about the project's schedule, activities, and potential risks and benefits, particularly for vulnerable groups such as those with limited education, economic resources, or access to land. These communities and households, as key organic waste generators, are vital to the project's success and can support source separation efforts.
Market Operators (Example; Agbogbloshie Market, Kaneshie Market, etc)	Generate significant organic waste; ensure proper waste separation and recycling practices.
International Central Gospel Church & School	These are religious/civic facilities located within close proximity to the project site. These land uses are sensitive receptors with direct exposure to potential environmental and social impacts such as odour, air quality, traffic, and noise. Their inclusion ensures that community concerns are addressed, promotes awareness and acceptance, and supports the development of effective mitigation measures and inclusive stakeholder engagement strategies.
Abossey Okai Central Mosque	
Bukom Boxing Arena	
Farmers Association including urban/peri urban farmers and landscapers	Key beneficiaries of compost output; promote use of compost for sustainable agriculture.
Public Health and Educational Institutions	
Korle Bu Teaching Hospital	Located about 60 meters away from the proposed project site is the Korle Bu Teaching Hospital (KBTH). KBTH is Ghana's largest teaching and referral hospital which provides advanced medical care, trains healthcare professionals, and conducts medical research. Engagement with KBTH will ensure health and safety considerations for neighbouring healthcare facilities.
Research Institutions and NGOs/CSOs and Development Partners	
Water Research Institute of the Council for Scientific and Industrial Research (CSIR-WRI)	CSIR-WRI is a prominent research institution in Ghana specializing in water resources management, research, and development. Collaborating with CSIR-WRI ensures effective management of water-related environmental impacts, supporting the plant's sustainability and alignment with national environmental policies.
NGO/CSO - Ghana Wildlife Society	Advocate for biodiversity conservation and climate resilience. Specialises in waterbirds and shorebirds research; engagement will ensure effective mitigation of the project's

Stakeholder Categories & Group	Connection to the Project
	potential impacts on these species, which may be present in the project area.
Accra School of Hygiene (SOH)	SOH is a public institution that specializes in training professionals in public health, environmental health, and related fields. SOH will provide insights to ensure the project meets public health and hygiene standards, promotes community well-being, and aligns with sustainable waste management goals. They often collaborate with organizations like GIZ and the Accra Metropolitan Assembly to address solid waste management, composting, and health challenges related to poor sanitation.
GIZ Ghana	GIZ Ghana has extensive experience in waste management in Accra and can provide valuable insights to enhance the project's efficiency. This includes ensuring alignment with local waste management policies, effective stakeholder engagement, capacity building, and adherence to environmental and social safeguards. GIZ's expertise in promoting circular economy practices can support resource recovery, contributing to Accra's environmental and economic goals. Additionally, GIZ can help address conflicts between scrap dealers (currently occupying the project site) and stakeholders, manage grievances, and ensure smooth project implementation.

Table 4.2 Stakeholder Identification Matrix

Project Component and Activities	Stakeholder (S)	Project Phase
Displacement of scrap dealers and informal waste pickers	- Waste Pickers Association - WIEDO	Pre-construction and construction phases
Risk of conflict associated with resettlement of scrap dealers	- Abossey Okai ICGC - Abossey Mosque - Community Members including vulnerable groups (e.g. women, elderly people, PWD, etc)	Preconstruction phase
Community and occupational health and safety	- AMA and sub-metros - Jekora Ventures Ltd - IRECOP - Community Members including vulnerable	Preconstruction, construction and operation phases

	groups (e.g. women, elderly people, PWD, etc) • ACARP • Accra School of Hygiene • GNFS • Triple C Ghana Ltd • Bukom Boxing Arena • Korle Bu Teaching Hospital • Abossey Okai ICGC • Abossey Mosque	
Improper waste handling and disposal impacts	• AMA and sub-metros • Jekora Ventures Ltd • IRECOP • Water Research Institute (CSIR) • Communities • ACARP • Accra School of Hygiene • Bukom Boxing Arena • Korle Bu Teaching Hospital	• Pre-construction, construction and operation phases
Threat to biodiversity	• Department of Parks and Gardens • Ghana Wildlife Division	• Pre-construction and construction phases
Impact on water resources	• Accra School of Hygiene • Triple C Ghana Ltd • Bukom Boxing Arena • Korle Bu Teaching Hospital • ESPA • MoFA-PPRSD • Fisheries Commission • Water Research Institute (CSIR) • ACARP • GNFS	• Pre-construction and construction phases

Traffic and accident risks	• EPA • Ghana Police - Korle District • Greater Accra Regional Coordinating Council (GARCC)	• Pre-construction and construction phases
Inefficient use of resources	• AMA and sub-metros • EPA • Water Research Institute (CSIR)	• Construction and operation phases
Climate risks	• NGO/CSO - Ghana Wildlife Society • EPA	• Pre-construction and construction phases
Labour rights infringement risks	• ESPA	• Construction and Operation Phases

4.2 Stakeholder Analysis

4.2.1 Stakeholder Interest Justification

The stakeholder analysis involved an assessment of the stakeholders identified with respect to their interests, and how these interests are likely to affect the planning and execution of the project, or whether they are affected or likely to be affected by the project. With regards to institutions, this analysis involved the roles and responsibilities of relevant government agencies, and other organisations that have direct or indirect stake in the implementation of the project. The analysis considered the likely negative impacts and how the respective roles and mandates of the institutions could help address such concerns.

4.2.2 Analysis of “Influence-Importance” Relations of Stakeholders

An assessment of the influence and power relations of each prospective stakeholder group in the planning and execution process of the projects helped identify the respective stakeholder influence in the proposed undertaking and how these stakeholders would need to be managed. In the context of this analysis, “influence” is the power which a stakeholder has over the planning/implementation process. It is the extent to which people, groups or organisations could persuade or compel others into making decisions. “Importance” indicates the extent to which stakeholders’ needs and interests will be influenced by means of the planning and subsequent implementation of the project. The relation between this influence and importance can be either high or low. The “influence–importance” relation, is scored accordingly, as presented in the matrix in Table 4.3 and subsequently explained in Table 4.3.

Table 4.3 Stakeholder Influence-Importance Matrix

		IMPORTANCE	
		Low	High
Influence	High	A	B

		Informal service providers Private sector, association and companies/industries	Government and regulatory bodies (Ministries and Government Agencies)
	Low	C Research institutions and NGOs/Civil Societies and Development Partners Public health and educational institutions	D Private sector, association and companies Formal service providers Communities and local stakeholders

Table 4. 4 *Explanation of the Influence-Importance Matrix*

A – A good working relationship must be created with this group
 B – This group will require special initiatives to protect their interest
 C – This group may have some limited involvement in evaluation but are relatively of low priority
 D – This group may be a source of risk, and will need careful monitoring and management

5.0 SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

5.1 Methods of Engagement

A structured consultation programme was developed to ensure effective stakeholder engagement and mitigate potential risk of apprehensions associated with the proposed project. The process complied with the legal requirements for public participation under Ghanaian laws (Environmental Protection Authority Act 2025 (Act 1124) and the Environmental Protection (Environmental Assessment) Regulations, 2025 (LI 2504). Additionally, the engagement strategy aligned with international best practices, including the IFC Performance Standards on Environmental and Social Sustainability (specifically Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts) and the World Bank Environmental and Social Framework (ESF), particularly Environmental and Social Standard 10 (ESS10): Stakeholder Engagement and Information Disclosure.

The team employed culturally sensitive methods for public consultations, ensuring inclusivity and relevance to local contexts. The consultations were conducted in English, Twi, and Ga (the main languages spoken by stakeholders) to facilitate understanding. Notifications were sent to state institutions through official correspondence, and meetings were held with traditional authorities. Engagements with community members and representatives were organized with the support of local assembly members and opinion leaders at times and locations convenient for participants. Consultation methods were adapted to comply with health and safety protocols.

The consultation activities included:

- **Community Forums:** Structured discussions with relevant groups and opinion leaders to gather diverse perspectives.
- **Key Informant Interviews:** One-on-one interviews with stakeholders, such as traditional authorities and local government representatives, to gain in-depth insights.
- **One-on-One Interviews:** Individual interviews with a maximum of five participants, conducted in compliance with health protocols.
- **Focus Group Discussions:** Group discussions with up to 15 participants to facilitate in-depth dialogue on key issues.
- **Validation Workshop:** A final participatory workshop to present ESIA findings, address stakeholder feedback, and confirm alignment with community and institutional expectations.

Stakeholder consultative meetings were conducted with national and local government agencies, community representatives, local stakeholders, private sector companies, and formal & informal service providers. A detailed list of these meetings held during the ESIA study is provided in Sections 5.2.1 and 5.2.2

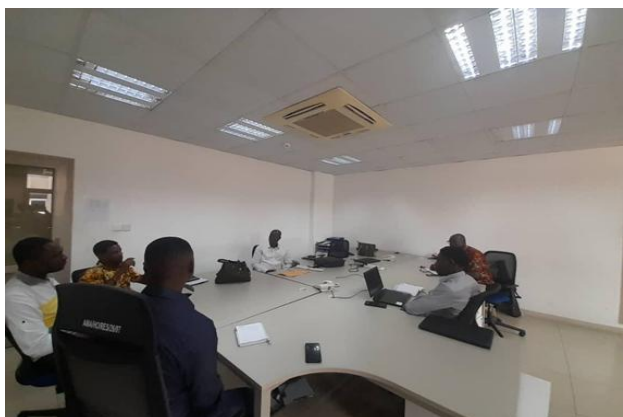
The meetings commenced with a project introduction and purpose of the meeting and followed with discussions to collect feedback. Concerns related to the impact of the project were also raised during the meetings.

5.2 Stakeholder Engagement Activities Undertaken

A total of twenty-eight (28) meetings with governmental and non-government agencies and ten (10) forums and meetings with all project communities were organised. The complete list of meetings organised during the ESIA study is presented in subsequent sections. Attendance lists for each meeting are presented in Appendices 1 and 2.

5.2.1 Consultations with National and Local Government & Institutional Stakeholders

A total of twelve (12) meetings in the form of interviews and focused group discussions were organized with representatives of national and local government organisations and institutional stakeholders (see Appendix 5). Plate 5.1 presents few pictures from the meetings.



Meeting with AMA & GIZ Project Team



Meeting with KBTH (Environmental Health Unit)



Meeting with Korle Bu District Fire station



Meeting with CSIR

Plate 5.1: Photos of meetings with national, local government & institutional stakeholders

5.2.2 Consultations with Communities & Religious Groups

Four (4) community forums were held with members and representatives from communities within a 1km radius of the project site. The communities engaged include Korle Bu, Korle Gonno, Jamestown, Mudor, Old Fadama/Konkoma, Agbogbloshie, etc. Participants include representatives of the following groups:

- Opinion Leaders/Assembly Members
- Residents
- Youth and Women Groups
- Persons with Disabilities
- Farmers' Associations
- Market women
- Food vendors and Eatery Operators
- Informal service providers: street sweepers, waste collectors/borla taxis/aboboyaa operators

Focus Group Discussions were held separately with women, market traders, and food vendors, and with informal service providers (Mortuary Road Scrap Dealers). In addition, stakeholder meetings were conducted with key religious institutions within the project AoI, including the leadership of International Central Gospel Church (ICGC) and Abossey Okai Central Mosque. Plate 5.2 shows some pictures from the community engagement meetings.



Community Forum at Jamestown



Meeting with Women Group – Korle Bu Forum



Meeting with Mortuary Road Scrap Dealers



Meeting with Sempe Korle Bu Mantse

Plate 5. 2: Photos of Community Engagements

5.3 Outcomes of Consultation

This section summarizes the key stakeholder issues raised during the ESIA process. The incorporation of these issues into the project design and mitigation measures is outlined throughout the ESIA. Table 5.1 presents a summary of concerns raised between February and March 2025.

Table 5.1 *Issues-Responses Matrix*

Issues	Stakeholder(s)	Concerns	Responses/categorisation of actions
Waste Generation, Collection and Segregation Programmes/Space & Waste Handling Concerns	• AMA and sub-metros • Jekora Ventures Ltd • IRECOP • Water Research Institute (CSIR) • Communities • ACARP • Accra School of Hygiene • Bukom Boxing Arena • Korle Bu Teaching Hospital	• Jekora Ventures Ltd's existing source-segregation program with clients provides a valuable case study for the proposed project and a potential partnership opportunity. • Concerns regarding space availability at the proposed site, including its capacity to accommodate all organic waste and the need for appropriate measures to handle by-products and operational waste. • Proper waste segregation and collection systems are crucial for effective waste management. To support these systems, informal service providers should be integrated into the waste collection and segregation programmes. • Households should be provided with litter bins and appropriate containers to facilitate the separation of waste at the source. • Households may not segregate waste properly • Risk of waste collectors mixing waste after segregation by households • People may not be motivated to segregate waste • There should be exclusion of unwanted waste types from the organic waste • Deploy personnel at collection points to monitor and enforce proper waste sorting. • Eateries need tailored collection services; Assign dedicated service providers.	• The project will identify potential synergies with Jekora Ventures Ltd's existing program. This will be addressed during further stakeholder engagement at the project implementation stage • The project will establish clear waste acceptance criteria and ensure sufficient space allocation for waste storage and processing by exploring space-sharing arrangements with IRECOP and other facilities. This will be addressed in the ESMP • The project will provide colour-coded bins within communities to facilitate waste segregation, coupled with incentives to encourage participation. This will be addressed in the ESMP. • Extensive public education on waste segregation will be conducted. This will be addressed in the ESMP.
Displacement and loss of livelihood of waste pickers	• Waste Pickers Association • WIEDO	• The association raised concerns regarding the potential displacement of existing waste picker and are seeking clarity on what the project offers them and how they will be integrated into the new waste management system • Clear guidelines on how the integration will be, and how well they would be remunerated	• The project will identify potential synergies with existing waste pickers and integrate their activities into the project • The project will ensure fair salaries and compensations for all staff. • Clear integration guidelines will be developed for and members will be

Issues	Stakeholder(s)	Concerns	Responses/categorisation of actions
			at liberty to decide whether to be on the project or not.
Public-Private Partnerships (PPP)	- Jekora Ventures Ltd - IRECOP	- Collaboration between private operators and public sectors (including AMA) is essential for project success. - Public-private partnerships (PPPs) should not only focus on infrastructure and capital but also extend to the policy level to ensure smooth operations. - To further encourage participation, incentives such as tax waivers and reduced permit renewal fees are necessary. - There is generally poor adherence to best practices by waste transporters	- The project will identify potential synergies with existing private operators, including Jekora Ventures and IRECOP. This will be addressed during further stakeholder engagement at the project implementation stage. - Clear environmental guidelines for waste collection and transport will be implemented. This will be addressed in the ESMP
Infrastructure Cost & Concerns	- Jekora Ventures Ltd - AMA and sub-metros	- Lack of infrastructure for source separation leads to higher costs. - No incentives to encourage source separation. - Lack of adequate facilities for processing organic waste; there should be promotion of composting and onsite anaerobic digestion at institutional and market levels	- The project will develop proper collection incentives, especially for informal service providers. This will be addressed in the ESMP. - Additionally, the project will explore carbon credit opportunities to sustain operations. This will be addressed at the project implementation stage.
Odour & Community Health & Safety, Occupational Health & Safety Concerns	- AMA and sub-metros - Jekora Ventures Ltd - IRECOP - Community Members - ACARP - Accra School of Hygiene - GNFS - Triple C Ghana Ltd - Bukom Boxing Arena - Korle Bu Teaching Hospital - Abossey Okai ICGC - Abossey Mosque	- Stench/odour is a major concern: delayed waste collection can result in unpleasant odours and create unsanitary conditions, emphasizing the need for timely waste disposal services. - Houseflies/pollution and associated health risks need to be managed. - Deterioration of access roads due to truck movement - Unauthorized entry into facility - Odour management concerns - Direct exposure to public; e.g., uncovered waste transport causing environmental and health risks	- The project will implement structured collection schedules to minimise waste decay and odours. This will be addressed in the ESMP. - The project will strengthen odour management systems; implement measures to control pollution/houseflies and other health hazards. This will be addressed in the ESMP. - The project will collaborate with relevant departments/authorities

Issues	Stakeholder(s)	Concerns	Responses/categorisation of actions
		• High safety standards required considering the project's proximity to sensitive receptors • Risk of fire outbreak due to organic waste and mixed materials • Site layout should be designed to support movement of firefighting equipment • Organic waste can generate flammable gases; Monitor and manage heaped organic waste to reduce fire risk • Uncontrolled site access increases risk of hazards; Wall the project site, create a buffer zone, and control entry and exit • The project should follow up on GARID and IRECOP health initiatives to ensure collaboration; Incorporate health screenings and educational workshops in project implementation. • Risk of health impacts from improper waste management. • Drug addiction among ISPs impacts waste handling. Include ISP rehabilitation/integration programmes. • Risks of staff misconduct, teenage pregnancies, and STIs; Develop strong labour management protocols.	responsible for road maintenance. This will be addressed in the ESMP. • Perimeter security and community sensitization on safety will be strengthened. This will be addressed in the ESMP. • Continuous stakeholder engagement will be ensured. This will be addressed in the ESMP. • Buffer zones with landscaping will be constructed. This will be addressed in the ESMP. • Specialized vehicles will be used for organic waste transport. This will be addressed in the ESMP.
Biodiversity Conservation	• Department of Parks and Gardens • Ghana Wildlife Division	• Trees to be removed during construction; • Parks and Gardens is responsible for identifying planting sites, planting, and nurturing trees. The project bears all associated costs. • Recommend proper landscaping and a green buffer between the project and surrounding communities. • Project site not near a wetland of conservation concern, but may attract Critically Endangered species like Hooded Vultures • The Korle lagoon is degraded but still supports adapted bird species; adopt conservation-friendly policies; avoid further pollution; support lagoon restoration	• For every tree removed, three must be planted. Parks and Gardens will issue an invoice for replacement. This will be addressed in the ESMP. • Proper landscaping and a green buffer will be implemented between the project and the surrounding communities. • Implement 'no-hunting rule' within the project implementation area for both staff and non-staff. This will be addressed in the ESMP. • Management measures will be implemented to avoid further pollution, support lagoon restoration

Issues	Stakeholder(s)	Concerns	Responses/categorisation of actions
		• Risk of hunting protected species (e.g., sea turtles, Hooded Vultures, Cattle Egrets) by staff; Enforce strict no-hunting policies; provide staff education on wildlife coexistence	and support adapted bird species. This will be addressed in the ESMP.
Social and Community Engagement & Support/Employment and Inclusion/Awareness Creation.	• AMA and sub-metros • Jekora Ventures Ltd • Ministry of Local Government • Community Members • ACARP • Accra School of Hygiene • Communities • Bukom Boxing Arena • Ghana Wildlife Division • Korle Bu Teaching Hospital	• Further stakeholder engagement may be needed. • Timeliness and execution of operations and processes should be disclosed to stakeholders • Local content must be factored into employment. • Community development should be integrated in project implementation. • Continuous awareness campaigns and regular engagement are essential to maintaining proper waste management. • AMA should provide bins, gloves, and masks to households to support project implementation • Avoid past mistakes by addressing capacity, odour control, and proper separation strategies. • Inclusion of PWDs in employment: design inclusive roles and consider skills of PWDs in workforce integration. • Operational clarity and inclusion of informal waste collectors is required; there should be formation of cooperatives assigned specific waste types to improve accountability and waste quality	• The project will conduct further stakeholder consultations at all phases and implement inclusive hiring policies, prioritizing local communities and marginalized groups. This will be addressed during further stakeholder engagement • Equitable trainings and capacity development programmes will ensure all staff have the needed capacity to work on the project. This will be addressed at the ESMP • The formation of cooperatives and the assigning of specific waste types can be taken up by AMA.
Capacity Building	• AMA and sub-metros • Accra School of Hygiene	• There should be Institutional ownership by AMA with legal backing through by-laws • Staff incompetence can cause accidents • The project may lack in-house SHE personnel. Recommended for the project to collaborate with experts from Accra School of Hygiene	• Trained and qualified personnel will be deployed for operations. This will be addressed at the project operation stage through further stakeholder engagement.
Labour Conditions	• ESPA	• Informal workers lack formal protections and regulation. • There have been poor working conditions in similar projects; ensure fair wages and safe work conditions.	• Informal workers will be incorporated in the project framework. This will be addressed during further stakeholder engagement at the project operation stage.

Issues	Stakeholder(s)	Concerns	Responses/categorisation of actions
Displacement/resettlement	AMA and sub-metros	Relocation and social safeguard concerns should be managed separately by AMA; not directly linked to the compost project	A resettlement strategy will be developed to ensure the smooth relocation of illegal settlers on the project site following the IFC PS5/WBG ESS5 requirements. This will be addressed during the pre-construction stage of the project by AMA.
Leachate Management	- Accra School of Hygiene - Triple C Ghana Ltd - Bukom Boxing Arena - Korle Bu Teaching Hospital	Risk of pollution of the Korle Lagoon	Proper management of leachate will be ensured to prevent further pollution of the already polluted Korle lagoon
Supply Chain	ESPA	- Informal workers operate independently; payment systems differ from formal contractors. - Informal operators pay fewer taxes and fees. - Formal sector inefficiencies drive informal sector growth. - Many informal workers are unregistered, making enforcement difficult.	- Informal workers will be integrated into formal structures to enhance regulation and collaboration. - Fee structures will be streamlined and formalized to ensure equity. - Performance gaps in formal service delivery will be bridged - Association membership will be encouraged to improve training and oversight. These concerns will be addressed during further stakeholder engagement at the project implementation stage.
Compost Quality & Market Demand	- Department of Parks and Gardens - Communities	- Current compost prices are high for ordinary farmers and landscapers. Reduce cost to increase affordability and uptake. - Presence of contaminants (e.g., bottles, nails) in compost: Ensure compost meets international standards to attract local and international buyers.	- Compost pricing will be addressed during further stakeholder engagement at the project implementation stage. - Compost quality issues will be addressed in the ESMP - Awareness creation on compost benefits and use will be addressed

Issues	Stakeholder(s)	Concerns	Responses/categorisation of actions
		- Limited awareness of compost benefits: Educate farmers on the advantages of compost over inorganic fertilizers to boost uptake. - Integrate compost use into urban greening and landscaping projects.	during further engagement at the project implementation stage.
Project sustainability	- Communities - AMA and sub-metros - Bukom Boxing Arena - Abossey Okai ICGC - Abossey Mosque	- Need for long-term planning, partnerships, and stable financing. Develop a sustainability plan with private sector engagement and secured funding - The need for long-term management and enforcement of source segregation. AMA to manage the facility; draft by-law being finalized to mandate segregation and proper collection - Need for clarity on project stages and regular updates	These will be addressed during further engagement at the project implementation stage.
Regulatory Compliance & Inspections/Environmental & Water Quality Concerns	- ESPA - MoFA-PPRSD - Fisheries Commission - Water Research Institute (CSIR) - ACARP - GNFS	- An ESIA must be conducted, and an EPA permit obtained for the project. - Facility inspections are necessary to ensure compliance with regulations. Obtain fire permit prior to construction, in line with L.I. 1724 - Comply with ISO 14001 (EMS) and ISO 9001 (QMS) standards - The nutrient content of the compost products must be verified during operations to ensure quality control - Baseline data on water, soil, and air quality should be collected to establish environmental benchmarks. - Leachate treatment should be prioritised to mitigate potential contamination. - Effluent quality should be monitored to ensure compliance with environmental standards. - Potential project impact on fisheries should be evaluated and to manage local aquatic ecosystems. - Need for alignment with environmental and quality standards	- The ESIA will identify mitigation measures, to minimize negative impacts, promote community well-being, and ensure environmental compliance. - Best practices will be incorporated into the project design and operations to minimise environmental impact. - Internal regulatory mechanisms within communities will be strengthened - All the issues will be addressed by the ESMP

Issues	Stakeholder(s)	Concerns	Responses/categorisation of actions
		• Task forces exist within the communities but lack comprehensive coverage. • Weak enforcement of by-laws and regulatory oversight. Recommendation: Improve enforcement mechanisms; enhance stakeholder involvement in drafting and implementing by-laws.	

5.4 Stakeholder Validation Workshop

The stakeholder validation workshop represented a key milestone in the ESIA process for the proposed Municipal Solid Waste Source Separated and Composting Plant Project. As part of the broader stakeholder engagement strategy, the workshop aimed to ensure that project-affected and interested parties were given the opportunity to review, comment, and contribute meaningfully to the finalization of the ESIA and associated ESMP. The primary objectives of the validation workshop were to:

- Disseminate key findings from the draft ESIS, including baseline environmental and social conditions, predicted project impacts, and proposed mitigation and enhancement measures.
- Validate the ESMP by engaging stakeholders on its mitigation strategies, institutional responsibilities, and monitoring frameworks.
- Capture informed feedback, concerns, and recommendations from a diverse cross-section of stakeholders including regulatory bodies, academic institutions, community representatives, and private sector actors.
- Reinforce transparency and accountability, aligning the project with Ghana's legal frameworks and international best practices such as the IFC PS.
- Promote stakeholder ownership and reduce future risks of conflict by clarifying project intentions, addressing misconceptions, and identifying opportunities for local collaboration and benefit-sharing.

5.4.1 Workshop Details

The validation workshop was held on Friday, 25th April 2025 at the Naa Dedei Hall within the Accra Metropolitan Assembly (AMA) premises. It was facilitated by the Environmental and Health Impact Assessment Group (EHG) with support from AMA, the C40 Cities Finance Facility (CFF), and GIZ.

The event was structured into three core sessions:

- Presentation of the draft ESIS findings, covering project background, baseline assessments, impact analysis, and an overview of the ESMP.
- An open stakeholder dialogue, featuring moderated discussions and targeted contributions from technical agencies, civil society groups, and community stakeholders.
- Final reflections and closing, during which key recommendations were captured, clarifications made, and next steps outlined for updating the ESIS.

Some photos from the section have been presented in plate 5.3.



Plate 5. 3: Photos of Validation Workshop

5.4.2 Summary of Stakeholder Feedback and Project Responses

Stakeholder inputs covered a wide range of environmental, social, operational, and institutional issues. Table 5.2 summarizes the key concerns raised and the corresponding responses and commitments from the project team.

Table 5. 2 Environmental and Social Concerns and Stakeholder Inputs

Environmental & Social Concern	Stakeholder Groups	Stakeholder Concern	Project Team Response
Surface Water and Leachate Management	Fisheries Commission, EPA	Potential contamination of the Korle Lagoon and groundwater due to leachate from organic waste; inadequate leachate control could exacerbate nutrient loading in a sensitive ecosystem.	The project will implement a robust leachate diversion system to an off-site treatment facility, install phytoremediation beds and engineered wetlands for secondary polishing, and construct engineered surface water drainage and erosion control infrastructure.
Odour Emissions	Korle Bu Teaching Hospital, Community Representatives	Risk of foul odour emissions affecting nearby communities, with past negative experiences from similar mixed waste facilities cited as a concern.	The project will adopt the Controlled Aerated Static Pile (CASP) composting method to ensure aerobic decomposition, process only source-separated organic waste from institutions and households and maintain a targeted input stream to reduce odour generation.
Air Quality and Dust Pollution	Jamestown Community	Concern over particulate matter emissions during construction and operation phases, posing health risks to residents.	The project will conduct bi-weekly air quality monitoring (PM _{2.5} and PM ₁₀) in accordance with EPA guidelines, carry out regular road watering and surface maintenance, and ensure proper aeration of compost piles to minimize dust and harmful gas accumulation.
Noise Disturbances	Nearby Residents	Anticipated noise disruptions from operational activities, especially during off-peak hours.	The project will implement a monthly noise monitoring program, restrict operations to designated daytime hours, install acoustic barriers around noise-generating equipment, and utilize low-decibel machinery to reduce sound levels.
Transport-Related Impacts	Community Stakeholders	Concerns about traffic congestion, vehicle emissions, and odour leaks from collection trucks, especially during peak hours near Korle Gonno.	The project will develop designated transport routes and collection schedules to avoid peak traffic periods, include GIS-based transport schematics in the final ESIS, and implement structured collection and fleet management plans to optimize logistics and reduce emissions.

Environmental & Social Concern	Stakeholder Groups	Stakeholder Concern	Project Team Response
Fire Safety and Hazardous Gas Risk	Ghana National Fire Service (GNFS)	Concern over fire outbreaks and chemical hazards, especially in light of incidents at similar waste facilities.	The project will co-develop a fire safety and hazardous gas management protocol with GNFS, establish emergency access routes, install fire suppression infrastructure, and conduct regular training and simulation drills for staff.
Baseline Data Integrity	Water Research Institute	Concern regarding the misrepresentation of baseline water quality data, with some parameters inaccurately reported as within acceptable limits.	The project acknowledged and rectified the reporting error, confirmed the exceedance of national water quality limits, and has annexed raw data tables and trend analyses in the final ESIA for full transparency.
Rodents and Pest Management	Korle Bu Teaching Hospital	Fears of vermin and pest infestations due to improper organic waste handling.	The project will enforce a 24-hour waste processing policy to prevent pileup, require strict PPE usage for all waste handling personnel, and conduct continuous temperature monitoring of compost piles to deter pest activity.
Inclusion of Informal Waste Pickers	NGOs, Community Representatives	Concern over the potential displacement of informal waste workers and insufficient engagement with their groups.	The project will actively engage with existing informal waste picker cooperatives, co-create inclusive integration models such as bifast centres with proper amenities, and establish fair compensation and transition mechanisms to support affected workers.
Community Education	Multiple Stakeholders	Emphasis on the need for extensive public education to promote source separation and foster community buy-in.	The project will implement targeted educational campaigns for schoolchildren, youth, and market vendors, with the aim of building long-term community awareness and promoting environmentally responsible waste practices.
Access to Draft ESIA	Institutional Stakeholders	Concern over limited access to the draft ESIA document, which constrained the ability of stakeholders to provide informed input.	The project will improve the timeliness of ESIA document dissemination for future engagements, ensuring stakeholders have adequate time to review and provide meaningful feedback.
Academic collaboration	Accra School of Hygiene, CSIR	Underutilization of academic institutions for research, training, and monitoring roles.	The project will formalize partnerships with academic institutions to support long-term monitoring, technical training, research collaboration, and adaptive project management.

6.0 STAKEHOLDER ENGAGEMENT PROGRAMME

The objective of the Stakeholder Engagement Programme is to establish and maintain constructive relationships with all stakeholders throughout the project lifecycle. The programme seeks to ensure that stakeholders are informed about project activities, potential environmental and social risks and impacts, mitigation measures, and opportunities for participation in project decision making.

The engagement programme is structured across the project phases including project preparation, pre construction, construction, operation, and decommissioning where applicable. Engagement activities will be undertaken periodically using appropriate methods tailored to the needs of different stakeholder groups. The schedule of engagement activities will remain flexible and adaptive to project developments and stakeholder concerns.

The programme also aims to strengthen transparency, accountability, trust, and community ownership while ensuring that vulnerable groups are effectively represented and their concerns integrated into project implementation.

6.1 Engagement Approaches and Appropriate Tools

To ensure effective communication with stakeholders during project implementation, and to enhance project outcomes, the project will adopt a two-pronged communication strategy:

- Deliver relevant project information to stakeholders in a culturally appropriate, gender sensitive, and timely manner, and foster a regular two-way flow of information between project implementers and these stakeholders; and
- Support intensive, sustained, broad and repetitive communication, education, and advocacy about the benefits of the project to foster public acceptance.

The communication strategy of the project is based on the following principles:

- Simple: the project aims to keep clear, consistent, and understandable messages to its different audiences.
- Interactive: the project will incorporate feedback from its stakeholders to increase interest in its activities and achievements and fine-tune its messages.
- Targeted: a generic approach to communication could lead to important target groups not being addressed. The project will customise its communication efforts for each stakeholder group identified to ensure that the message reaches the relevant actors.
- Inclusive: Project information will be made available for stakeholders to have access to;
- Cultural appropriateness: Engagement activities will be conducted in a manner that respects local customs, traditions, languages, and social structures;
- Responsiveness: Stakeholder concerns, grievances, and recommendations will be acknowledged, reviewed, and addressed in a timely and appropriate manner;

- **Accountable:** the communication strategy will be monitored and evaluated according to the project activities plan; and
- **Continuous Engagement:** Stakeholder engagement will be undertaken continuously throughout the project lifecycle from project preparation to decommissioning.

6.1.1 Engagement Approaches

The project will adopt a range of stakeholder engagement approaches to ensure effective communication, consultation, collaboration, and participation throughout the project lifecycle. The approaches have been designed to address the different levels of stakeholder interest, influence, accessibility, and vulnerability while ensuring that stakeholder concerns and expectations are adequately integrated into project decision making processes. The types of approaches that will be used include:

- **Information disclosure approach:** This will involve providing stakeholders with timely, accurate, and accessible information about the project and its potential environmental and social impacts. Information will be shared through appropriate communication channels such as meetings, notices, reports, and digital platforms.
- **Consultation approach:** Stakeholders will be engaged to obtain their views, concerns, and recommendations regarding project activities and mitigation measures. Consultations will be conducted throughout the project lifecycle using methods such as meetings, focus group discussions, workshops, and interviews.
- **Participatory engagement approach:** This approach will promote stakeholder ownership and improves the sustainability and acceptance of project activities.
- **Collaborative engagement approach:** This focuses on working jointly with stakeholders to address project issues and develop appropriate solutions. It promotes partnerships, coordinated decision making, and shared responsibility among stakeholders.

6.1.2 Engagement Tools

A range of engagement tools will be utilised to support the various engagement approaches adopted for the project. The tools selected will depend on the stakeholder category, engagement objective, project phase, accessibility, literacy level, and sensitivity of the issue being addressed. The appropriate engagement tools:

- **Public meetings and community durbars:** Public meetings and community durbars will be used to engage large groups of stakeholders and communities on project activities, potential impacts, mitigation measures, and project updates.
- **Focus group discussions (FGDs):** FGDs will be used to facilitate detailed discussions with specific stakeholder groups, particularly vulnerable groups and project affected persons.
- **Key informant interviews (KIIs):** KIIs will be conducted with individuals and institutions possessing specialised knowledge or influence relevant to the project.

- Workshops and stakeholder forums: Workshops and stakeholder forums will be organised to facilitate technical discussions, collaborative planning, and information sharing.
- Digital communication platforms: Digital communication tools will be used to improve accessibility and timely information dissemination.

6.2 Strategy for Information Disclosure

The project will implement a transparent and accessible information disclosure strategy to ensure stakeholders receive timely and accurate information regarding project activities, environmental and social risks, mitigation measures, grievance procedures, and project progress.

Information will be disclosed through multiple communication channels including community meetings, public notices, stakeholder workshops, information leaflets, social media platforms, project reports, and direct consultations. Information will be communicated in English and local languages such as Ga and Twi to enhance accessibility and understanding among local communities.

Special attention will be given to vulnerable groups to ensure information is understandable, culturally appropriate, and accessible.

6.3 Strategy for Consultation

The strategy aims to provide stakeholders with timely and accessible information regarding project activities, anticipated environmental and social (E&S) risks and impacts, mitigation measures, project benefits, and opportunities for participation in decision making processes. It also seeks to ensure that stakeholder concerns, expectations, and recommendations are adequately considered and integrated into project planning, implementation, monitoring, and decommissioning activities.

Consultations will be undertaken in a culturally appropriate, gender responsive, and accessible manner to promote meaningful participation of all stakeholder groups, including vulnerable persons such as women, youth, persons with disabilities, elderly persons, and informal workers. Engagements will be conducted using languages commonly spoken within the project area and through communication methods that are suitable for the literacy levels and social characteristics of the affected communities.

The consultation process will be implemented across all project phases, namely pre construction, construction, operation, and decommissioning phases. During construction and operation phases, consultations will address issues such as occupational and community health and safety, traffic management, labour infringement, waste management, grievance management, and environmental monitoring. During decommissioning, consultations will focus on rehabilitation activities, restoration measures, community safety, and closure related impacts.

A variety of consultation methods and tools will be employed to ensure effective stakeholder participation. These may include public meetings, focus group discussions, stakeholder workshops, key informant interviews, institutional meetings, household consultations, information leaflets, social media platforms, emails, public notices, and one on one engagements. The selected consultation method will depend on the stakeholder category, nature of the issue, accessibility considerations, and project phase.

Prior information regarding consultation activities will be communicated to stakeholders through culturally appropriate and accessible channels, including community information centres, traditional authorities, assembly announcements, WhatsApp platforms, emails, letters, and notice boards. Stakeholders will be informed in advance about the purpose, date, venue, and expected outcomes of the consultation activities to encourage meaningful participation.

The project will ensure that all consultations are properly documented, including records of participants, issues raised, concerns expressed, responses provided, agreements reached, and follow up actions required. Feedback received from stakeholders will be reviewed and incorporated into project decision making processes where feasible. Stakeholders will also be informed about how their concerns and recommendations have been considered.

To promote accountability and continuous improvement, the effectiveness of consultations will be monitored using Key Performance Indicators (KPIs) such as the number of consultation meetings conducted, stakeholder participation levels, representation of vulnerable groups, number of grievances received and resolved, stakeholder satisfaction levels, and implementation status of agreed actions.

The consultation strategy will remain flexible and adaptive throughout the project lifecycle to respond to emerging issues, stakeholder concerns, regulatory requirements, and project changes.

6.4 Proposed Strategy for Taking into Account the Views of Vulnerable Groups

The project acknowledges that vulnerable groups may face barriers to participation in stakeholder engagement processes. To ensure inclusivity, targeted consultation approaches will be adopted to facilitate effective participation of women, persons with disabilities, elderly persons, informal workers, and the youth.

Dedicated focus group discussions and separate meetings will be organised where necessary to create safe and comfortable spaces for vulnerable stakeholders to express their concerns. Engagements will be conducted in local languages and at locations and times convenient to participants.

The project will also ensure that grievance mechanisms are accessible, confidential, and responsive to the needs of vulnerable groups.

6.5 Proposed Strategy for Information Disclosure

Stakeholder consultation will be an ongoing process throughout the project, involving multiple rounds of information sessions and public disclosures. Engagement activities will include public notices, one-on-one meetings, and responses to emails, phone calls, and written inquiries, as well as district-based public forums. Continuous monitoring and reporting are essential to track progress, address issues, and maintain a comprehensive record of engagement. The process begins at the project's preliminary stage and continues through implementation. Table 6.1 outlines the proposed stakeholder engagement approach.

Table 6.1 Stakeholder Engagement Plan

Project Phase	Stakeholders	Priority E&S Issues to Engage on	Engagement Objective	Prior Information/Communication Method	Engagement Method/Tools	Frequency	Responsibility	Expected Outputs/KPIs
Disclosure of the ESIA Report	AMA, sub metros and neighbouring affected MMDAs, Environmental Protection Authority (EPA), Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ), Traditional Authorities within the project area	Disclosure of approved Environmental and Social Impact Statement (ESIS), stakeholder awareness of project impacts and mitigation measures, transparency and access to project information	Ensure stakeholders and the public are informed about the approved ESIS and understand where and how to access the document	Public notices, stakeholder notifications, official letters, emails, community announcements, and digital disclosure platforms where applicable	Publication of approved ESIS to inform the public where they can access the documents, delivery of hard and/or soft copies of the approved ESIS to relevant stakeholders	After EPA approval of the ESIS and during the disclosure period	AMA	Approved ESIS publicly disclosed, number of stakeholders reached, number of hard and soft copies distributed, increased stakeholder awareness and access to project information

CONSTRUCTION & OPERATION OF A SOURCE-SEPARATED ORGANIC WASTE COMPOSTING PLANT – SEP

Pre-Construction phase	Waste pickers and scrap dealers	Displacement risks, livelihood restoration, integration into project activities	Ensure affected persons understand project impacts and livelihood restoration measures	Community announcements, local language meetings, notices through association leaders	Focus group discussions, stakeholder meetings	Monthly	AMA/Project Team	Number of consultations conducted, agreements reached, grievances resolved
Construction phase	AMA, Affected institutions/organisations in the project area, affected Project MMDAs and communities within project AoI, vulnerable groups.	community health and safety	Inform communities on construction activities and mitigation measure	Community announcements, local language meetings, notices through association leaders	Community forums, public meetings	Quarterly	Contractor/AMA	Reduction in complaints, attendance records, awareness created
Operation phase	Formal and informal waste service providers	Waste segregation, waste transportation, occupational and health and safety	Promote effective waste management practices and compliance	Training workshops, digital platforms, stakeholder notices	Workshops and training sessions	Biannually	Facility Operator	Number of personnel trained segregation compliance rates
	AMA, Project contractor, Affected institutions/organisations in the project	Effluent discharge, biodiversity impacts and	Ensure regulatory compliance and	General meetings/institutional engagements and	Technical consultations	Quarterly	AMA/Facility Operator	Monitoring reports and submitted

CONSTRUCTION & OPERATION OF A SOURCE-SEPARATED ORGANIC WASTE COMPOSTING PLANT – SEP

	area, Project communities/representatives, including vulnerable groups and affected project MMDAs	compliance monitoring	environmental monitoring	community meetings and interviews				
Decommissioning phase	AMA, affected institutions/organisations within the project area, project communities/representatives, affected Project MMDAs	Decommissioning activities and schedule, community health and safety risks, traffic disruptions, waste management, rehabilitation/restoration measures, grievance management, and labour related concerns	Inform stakeholders on planned decommissioning activities, potential impacts, mitigation measures, and grievance procedures	Community and institutional notifications, stakeholder notices, public announcements, local language communication, Code of Conduct, and grievance redress procedures through physical meetings and digital platforms where applicable	General stakeholder meetings, community meetings, institutional consultations, public notices, and focus group discussions	Prior to commencement of decommissioning activities and throughout the decommissioning phase	Project Contractor/AMA	Number of stakeholder engagements conducted, level of stakeholder participation, grievances recorded and resolved, awareness created on decommissioning impacts and mitigation measures, successful disclosure

CONSTRUCTION & OPERATION OF A SOURCE-SEPARATED ORGANIC WASTE COMPOSTING PLANT – SEP

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7.0 GRIEVANCE MECHANISM

The legal framework for Grievance Redress has basis in the Constitution of Ghana (Article 20), as well as in the State Lands Act (1962). In accordance with IFC PS1, a grievance mechanism (GM) will be developed to address project implementation concerns promptly and effectively, in a transparent manner. The GM will be culturally appropriate and readily accessible to all project affected-parties and interested parties, at no cost and without retribution. The GM process, or procedure will not prevent recourse to judicial or administrative remedies. Specifically, the GM will:

- Provide affected people with avenues for making a complaint or resolving any dispute that may arise during the course of the implementation of the project;
- Ensure that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants; and
- Minimise to the barest minimum the need to resort to judicial proceedings.

Grievances may take the form of specific complaints about actual damage or injury, general concerns about project activities, incidents and impacts, or perceived impacts. The project will provide a mechanism that would provide opportunities for all direct and indirect beneficiaries, service providers and other stakeholders along the entire supply chain (both upstream and downstream activities) to report and seek redress for project related complaints. Stakeholders would be sensitized about the GM, as well as measures put in place to address project related complaints at the community, district, regional and national levels in a confidential manner. This will be done as part of continuous stakeholder consultations.

7.1 Grievance Redress Structure

The project will adopt and enhance the existing grievance redress structure for MMDAs in Ghana. At the district assembly level in Ghana, complaint resolution involves a multi-tiered approach, leveraging established structures and community engagement to address grievances effectively. This includes community-level committees, collaboration with local authorities, and the formal mechanisms of the Assembly itself. Grievances are resolved or referred to the following levels depending on the nature of the complaint or dispute:

- Community Grievances and Surveillance Committees (CGSCs);
- Collaboration with Local Authorities and Stakeholders; and
- Formal Assembly Structures.

The contractors who will be involved in both the pre-construction and construction phases will be required to develop simple GRMs that align or feed into the existing GRM structures of the AMA. Construction and operational staff at the project level will maintain a grievance and conflict resolution log and report outcomes to the AMA and finally to the Greater Accra Regional Coordinating Council (GARCC) if required.

In line with IFC PS 1 and 2, the project GRM will be accessible to all project-affected persons. Contractors will be required to establish worker-specific grievance mechanisms for their

employees, coordinated with the project GRM to ensure oversight and consistency. All other external stakeholders, including informal waste pickers and affected community members, will access the project GRM directly. Both the worker and community channels will ensure confidentiality, protection against retaliation, and transparent resolution of concerns. The transparent nature of resolving grievances and active involvement of local structures, i.e., CGSCs and MMDAs supported by the GARCC at the regional level will enable the GRM to address grievances amicably. This proven mechanism would be followed to facilitate all grievances or complaints at any point during the various phases of the project. The CGSCs within the various beneficiary MMDAs will be empowered to address any issues that may arise within their jurisdictions during the implementation of the project (especially with regards to the upstream activities i.e., source segregation, waste collection and haulage). Where a CGSC cannot resolve any grievance at the local MMDA level, it would be escalated to the GARCC who would coordinate with the relevant MMDA to find a solution to the complaint. The Public Relations and Social Welfare & Community Development Officers at the AMA will play a key role in coordinating the resolution of all grievances which will then be logged for record-keeping and tracking purposes. Table 7.1 shows the grievance redress roles

Table 7.1 **Grievance Redress Roles**

Level	Agency/Individual	Grievance Redress Role
Regional, District	GARCC, AMA and other beneficiary/participating MMDAs	● Establish GRMs via circulars and memoranda ● Provide operational guidelines for GRMs, e.g., source segregation and waste collection activities ● Designate necessary funds and staff to facilitate GRM operations ● Maintain databases on the status of grievance handling by Contractors and CGSCs ● Participate in GRM activities ● Monitoring grievance-handling processes by Contractors and CGSCs ● Coordinate the functions of CGSCs ● Provide capacity-building training to CGSC members
Contractors / CGSCs	Grievance Redress Committees	● Maintaining a list of those who are directly or indirectly affected by construction, operations, and maintenance work ● Addressing grievances excluding issues of GBV/SEA/SH

7.1.1 **Grievance Resolution Procedure**

Information about the GM will be publicized as part of the initial programme of consultations and disclosure in all the participating MMDAs. Brochures will be distributed during consultations and public meetings, and posters will be displayed in public places such as in GARCC and MMDA offices, contractors' offices, notice boards available to strategic

stakeholders such as the Teaching Hospital and Police Departments at Korle Bu, etc. Information about the GRM will also be posted online on websites of implementing MMDAs. The overall grievance resolution framework will include six steps described below. The six steps demonstrate a typical grievance resolution process.

Step 1: Reception and Registration

A formal grievance can be lodged at GARCC and AMA offices in Accra or any beneficiary district office with trained dedicated staff from the Public Relations and Complaints Committee (PRCC), or at the community level through the Contractors or the CGSCs. Grievances may be lodged by a variety of different means, including direct reporting in person to the project office/district office, use of suggestion boxes, by direct phone calls, through WhatsApp, by mail or on the web. For regular calls, a toll-free number or dedicated phone number will be promoted through posters and local radio stations for lodging formal complaints or grievances. Stakeholders will be required to report instances of gender-based discrimination, sexual harassment, and sexual violence either directly or through email or phone calls. The PRCCs will accept any complaint submitted anonymously and any complaint from individuals who identify themselves initially but request anonymity during the investigation and adjudication process. Although it is inherently difficult to investigate anonymous complaints, investigations into such complaints will be as thorough as is practicable and will be appropriate to the allegations. All Project staff will be trained to pass on all submissions that could be considered to form a grievance directly to the Communication Specialist / Project Liaison Officer as soon as possible after they are received. The complaints will be recorded on the complaint form in cases where the complainant is unable to fill in the form.

Details of the person lodging the grievance and information regarding the grievance will be recorded in the register. All grievances will be recorded by the Communication Specialist or Environmental and Social Specialist, who will ensure the grievance is captured in a centralized electronic Grievance Database where the status of the grievance captured will be linked to all the IAs or various levels of grievance redress mechanism. Community and village leaders and government departments will also be advised to pass any complaints they receive to local offices of the IAs from where they will be forwarded to the PCUs.

The PRCC staff responsible will record each grievance on a standard Grievance Form and will ensure that the name of the community, the date recorded, the name of the complainant and the name of the person that received the grievance are noted. The complainant will be required to complete a grievance form with the assistance of the Communication Specialist, who will record the grievance in a grievance log according to the category of grievances (for example, unfair employment process being followed, loss of livelihood or communication and information not transparent). A grievance can also be lodged by sending a grievance form or written complaint directly to the Contractors or the CGSCs. All grievances will be logged in a grievance log file.

All incoming inquiries and grievances will be reflected in a dedicated grievance register and assigned an individual reference number. The grievance register will also be used to track the

status of an inquiry/grievance, analyse the frequency of complaints arising, their geographic distribution, typical sources and causes of complaints, as well as to identify prevailing topics and any recurrent trends. The grievance register will contain the following information:

Grievance Register

1. a unique reference number;
2. date of incoming grievance;
3. location where the grievance was received/submitted and in what form;
4. complainant's name and contact details (in case of non-anonymous inquiries and grievances); contents;
5. identification of parties responsible for addressing and resolution of the issue;

Step 2: Screening, Prioritization and Assignment

Complaints received by the project will be handled as is reasonably practicable, depending on the nature and complexity of the grievance. To expedite the screening process, all incoming grievances will be lodged into the central database, according to their nature based on the following categories:

- A0: Request for information not directly related to the Project
- A1: Questions/Doubts
- A2: Requests/Petitions
- A3: Complaints

Following this preliminary assessment, the grievance will be directed to the respective project entity for resolution. The respective entity will report back on the grievance. Grievances will be prioritized according to their severity and complexity level. Table 7.2 shows the priority levels that will be applied:

Table 7.2 *Grievance Priority Classification*

Priority Level	Description	Example
High	Concern, claim or grievance involving stakeholders of high priority, and: • Reports on a breach of human rights • Relates to legal non-compliance • Poses a short-term risk to the project continuity	• Group complaints; Issues involving third parties (e.g., social, environmental impacts)
Medium	Concern, claim or grievance from stakeholders (individual or as a group) that could impact the project reputation or compromise its development at medium term.	• Individual complaints. • Issues involving other departments within AMA, Contracting Entities
Low	Concern, claim or grievance regarding lack of information or unclear information provided.	• Lack of information

Step 3: Examination

As part of the “admissibility verification,” an examination of the grievances shall be undertaken in order to verify the validity of the complaint, determine its causes and develop corrective actions to minimize or avoid recurrence of the causes. Then, a file and registration number are assigned, giving treatment within a period no longer than 30 days. The resolution process should be performed within 10 working days after having finalized the examination process for high priority grievance, 14 working days for medium priority and 28 days for low priority (Table 7.3). In that period, the corresponding response must be raised, whether the complaint is justified or not, and leave a record of what has been expressed. The timeframe will be communicated to the complainant, in written form if needed. The approach definition depends on the priority level of the issue raised. The actions and accountability of managing every grievance will be different.

Table 7.3 *Grievance Actions*

Step	Action	Resolution Time
1	Receive and register the grievance	within 5 Days
2	Acknowledge, assess grievance and assign responsibility	within 7 Days
3	Development of response	within 14 Days
4	Implementation of response if an agreement is reached	within 1 Month
6	Initiate a grievance review process if no agreement is reached at the first instance	within 1 Month
7	Implement review recommendation and close grievance	within 2 Months
8	Grievance taken to court by the complainant	-

Step 4: Grievance Closure

Once a complaint has been investigated, a letter will be sent to the complainant, explaining the outcome of the investigation and the proposed course of action to resolve the grievance. The Communication Specialist or the PRCC, in the case where the grievances are addressed at the local level, will contact the complainant in person if this is required and explain the results of the investigation and the proposed course of action. If the complainant is satisfied that the complaint has been resolved, he/she will be required to sign a statement confirming that the complaint has been resolved. If the complaint has not been resolved by mutual agreement, a re-assessment may be undertaken if new information becomes available in support of the claim/complaint. If the complainant is still not satisfied with the resolution, the grievance will then go into mediation. If applicable, the grievance committee will monitor the implementation of the resolution and the claimant’s satisfaction with this implementation. Resolution and sign-off on the grievance captured will be noted in the grievance issues database. All grievances, regardless of their status, will be kept since it will provide proof in case of litigation.

Step 5: Appeals

Unresolved grievances will be investigated by a grievance committee formed at the level of the GARCC/AMA. This committee will only meet to resolve problems that cannot be resolved during steps one to four. AMA will allow for an independent arbitrator if grievances cannot be resolved internally. It is important to note that the project will not cover the expenses for the services of the arbitrator. In exceptional cases, depending on the relevance of grievance, the

project may consider taking care of only transport costs borne by the plaintiff or complainant. Special attention will be given to SEA/SH grievances (marked as confidential) to ensure confidentiality and to avoid intimidation of complainants or survivors, through the referral pathway for redressing GBV / SEA / SH cases, as described below under section 7.1.2.

7.1.2 Protocol for Referral of GBV/SEA/SH Cases

The project GRM will have alternative channels for referral and handling Gender-based violence, Sexual Exploitation and Abuse, Sexual Harassment (GBV/SEA/ SH) cases, given that the general GRM may not be appropriate for reporting or handling the sensitivities associated with GBV / SEA / SH cases which require specific professional intervention to ensure minimized trauma and facilitation of recovery of the survivor. Therefore, referral mechanisms will be instituted to ensure that the survivor receives the right attention on an SEA / SH issue.

In each project MMDA, the relevant state and non-state agencies that are available and accessible can be used as both entry points and referral agencies for GBV/ SEA/ SH cases, including the Domestic Violence and Victims Support Unit (DOVVSU) of the Ghana Police Service and the Department of Social Welfare will be identified, mapped out and integrated into the GBV/ SEA/ SH procedure. Thus, for GBV/SEA/SH cases, the project GRM primarily serve to: (i) refer complainants to the GBV service provider; and (ii) record resolution of the complaint. Information on a GBV/SEA/SH case in the GRM will be treated confidentially, especially when related to the identity of the complainant. No identifiable information on the survivor is stored in the GRM. The GM will not ask for, or record, information on more than the following related to the SEA/SH complaints:

1. The nature of the complaint (what the complainant says in her/his own words without direct questioning);
2. If, to the best of the survivor's knowledge, the perpetrator was associated with the project;
3. If possible, the age and sex of the survivor; and
4. If possible, information on whether the survivor was referred to GBV services.

There will be multiple complaint channels for GBV/SEA/SH cases, including local community organizations, health care providers, etc. Project communities will be provided with functional toll-free helplines, notably, the Single Window Citizens Engagement Service (SWCES) and the Orange Support Centre, both of which are operated by the Ministry of Gender, Children and Social Protection. These helplines are linked to a wide range of service providers and offer comprehensive support for complainants.

Immediately after receiving a complaint directly from a survivor, the GRM operator will assist the survivor by referring them to GBV service provider(s) for support, based on the list of service providers already available from the mapping exercise. However, if a case is first received by the GBV service provider or through other identified reporting channels, the report will be sent to the GRM operator to ensure it is recorded in the GRM system.

With their consent, a survivor will be provided with information on their options regarding the processing and resolution of the case and clearly communicate to the survivor any mandatory legal reporting requirements depending on the nature of the case. As part of the established resolution process of an SEA/SH case, an agreement will be reached on a plan for resolution as well as the appropriate disciplinary action for the perpetrator, all within the shortest timeframe possible to avoid further trauma to the survivor. Through the GBV service provider, the appointed GRM operator will be informed about the resolution of the SEA/ SH case, and it will then be closed in the GM and the World Bank will then be notified that the case is closed.

7.2 GRM Training

The AMA, with support from GARCC, will conduct GRM training for all relevant stakeholders within the AMA and surrounding MMDAs. The main objective of the training is to ensure that beneficiaries and supply chain participants understand the levels, structures, complaint submission channels and how complaints can be addressed. A step-down training will be organized for the contractors and CGSCs. The training will aim at building the capacity of these structures to be able to handle grievances at the community level per the GRM structure.

8.0 IMPLEMENTATION ARRANGEMENTS

The Project Implementation Unit (PIU) will be responsible for the overall implementation, coordination and monitoring of the Stakeholder Engagement Plan (SEP) throughout all phases of the Project. The PIU will ensure that stakeholder engagement activities are undertaken in a timely, inclusive and culturally appropriate manner, and in accordance with applicable national regulations and international standards.

The PIU will designate a Stakeholder Engagement Officer to coordinate SEP implementation and serve as the primary point of contact between the Project and stakeholders. The designated officer will be responsible for planning and organising stakeholder consultations, maintaining stakeholder databases, documenting engagement outcomes, managing information disclosure processes.

The key roles and responsibilities within the PIU for SEP implementation will include:

- Coordinating stakeholder engagement activities across all project phases;
- Ensuring timely disclosure of relevant project information to stakeholders;
- Maintaining records of consultations and feedback;
- Facilitating communication between affected communities, regulatory agencies, local authorities and the AMA;
- Monitoring stakeholder concerns and ensuring that appropriate corrective actions are implemented;
- Preparing periodic stakeholder engagement reports; and
- Ensuring compliance with national regulatory requirements and applicable international standards on stakeholder engagement.

The PIU will collaborate with relevant government institutions, local authorities, contractors, consultants and community representatives to support effective implementation of the SEP. Contractors and subcontractors engaged on the Project will also be required to comply with the stakeholder engagement requirements outlined in the SEP, particularly in relation to community relations, information disclosure, occupational health and safety communication and grievance management.

9.0 MONITORING AND REPORTING

9.1 Objective of Monitoring and Evaluation

Stakeholder engagement activity must be monitored and evaluated at all levels to ensure these are carried out in accordance with the relevant requirements of the SEP, and for follow up remedial actions, where necessary. The provisions for monitoring and evaluation (M&E) will ensure the proposed actions are implemented as intended and within the project stages established, and also that, the expected results are achieved. Where shortcomings or problems are found, M&E can initiate appropriate corrective action.

The monitoring of project activities related to stakeholder engagement must fit into the overall project M&E framework. The objective of the monitoring plan will be to ensure that all stakeholders are provided with timely and updated information with regards to the implementation of the project. The focus of the M&E will include an assessment of the following:

- SEP implementation is in accordance with the national and international regulations;
- Whether SEP implementation has to be adjusted due to changes that have occurred;
- Whether complaints and grievances are being properly and effectively addressed; and
- Inform decisions to resolve problems encountered during SEP implementation.

Actions will be monitored and evaluated internally by a Monitoring and Evaluation Team (MET) to be constituted by the PIU.

9.2 Purpose and Responsibility of Internal M&E

The purpose of the internal M&E will be to verify that:

- Actions and commitments described in this SEP are implemented;
- Eligible people to be affected by the works receive their full compensation; and
- Complaints and grievances lodged by project affected persons (PAPs) are followed-up and resolved.

Evaluation and monitoring are key components of the SEP. They have the following general objectives:

- Monitoring of specific situations or difficulties arising from the implementation, and of the compliance of the implementation with objectives and methods as set out in this SEP; and
- Evaluation of the mid- and long-term impacts of any project activity on affected households' livelihood, environment, local capacities, on economic development and settlement.

Monitoring aims to correct implementation methods during the course of a project, as required. Evaluation is intended at checking whether policies have been complied with and providing

lessons learnt for amending strategies and implementation in a longer-term perspective. Monitoring will be internal and evaluation external.

9.3 Stakeholder Engagement Feedback System

The PIU will establish a system for integrating stakeholder's feedback throughout all phases of the Project, including pre-construction, construction, operation, and decommissioning. The objective is to ensure that stakeholder concerns, suggestions and grievances are properly documented, reviewed and addressed in a timely and transparent manner.

Feedback received during consultations, meetings, surveys and other engagement activities will be recorded through meeting minutes, attendance sheets, consultation records and grievance logs. The feedback will be reviewed and categorised according to key environmental, social, health, safety and livelihood issues to support effective project management and decision making.

The Monitoring and Evaluation Team will monitor stakeholder concerns and assess the effectiveness of mitigation measures and engagement processes. Particular attention will be given to issues relating to community health and safety, compensation, environmental impacts and concerns affecting vulnerable groups.

The outcomes of stakeholder engagement and feedback management will be documented in periodic environmental and social monitoring reports to relevant regulatory agencies and stakeholders, where necessary. These reports will include a summary of key concerns raised, actions taken, grievance resolution status and any outstanding issues requiring further attention. To maintain transparency and accountability, responses to stakeholder concerns and actions taken by the AMA will be communicated back to stakeholders through appropriate channels such as community meetings, notices, and direct engagement.

The GRM will also be monitored regularly to ensure that complaints and concerns are addressed fairly, promptly and effectively. Records of grievances, investigations and resolutions will be maintained throughout the Project lifecycle to support continuous improvement in stakeholder engagement and project implementation.

9.4 Participatory Monitoring and Evaluation Plan Indicators

The Monitoring and Evaluation Team (MET) will be expected to develop and implement a Monitoring and Evaluation Plan (MEP). The main indicators the MEP will measure include:

- Impacts on affected individuals, households, and communities to be maintained at their pre-project standard of living, or better;
- Improvement of communities affected by the project;
- Timeliness and adequacy of information delivery; and
- Management of disputes or conflicts.

The PIU will undertake routine internal M&E of the implementation of the SEP so as to ensure that all the responsible units follow the schedule and comply with the principles of the SEP. The monitoring program will provide continuous feedback on the implementation of the SEP. Monitoring teams will be constituted and will report regularly to the PIU. The team will include an Environmental Safeguards Specialist and Social Safeguards Specialist. Through the M&E, PIU will establish a reporting system for the project SEP that will:

- Provide timely information to the project about all stakeholder engagement activity and issues arising;
- Identify any grievance, especially those that have not yet been resolved at the local level and which may require resolution at higher levels;
- Document completion of project resettlement and compensation that are still pending, including for all permanent and temporary losses; and
- Evaluate whether all PAPs have been compensated in accordance with the requirements of the RAP and that PAPs have better living conditions and livelihoods.

Instrument of monitoring will include the following:

- Questionnaires with data stored in a database for comparative analysis (before-after and with-without); and
- Documentation and recording of PAPs situation, including subsequent uses of assets and any improvements

9.5 Reporting

The monitoring unit will submit periodic (preferably bimonthly) reports to the PIU and copied to the Ministry of Local Government, Decentralisation and Rural Development and AMA. The report will cover activities regarding stakeholder engagement, the methods used, the issues raised, how those issues have been resolved and provision made for future engagement. This report will form part of the PIU's regular and agreed report to the World Bank.

9.6 Budget for Implementation

Table 8.1 shows the budget for the Stakeholder Engagement Plan. It excludes the project personnel costs, which will be charged directly to the project.

Table 9.1 *Budget for the Stakeholder Engagement Plan*

Activity	Budget (\$)
Logistics (Flip chart, notepads, pens, stickers, whiteboard markers, etc.)	10,000
Printing of technical reports	5,000
Implementation of GM (staffing, communication, training, record keeping, and contingency)	8,000
Monitoring and Reporting	20,000

Total	43,000
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Project Phase	Activity	Budget (\$)
Pre-construction	Community durbars, focus group discussions, institutional consultations, venue arrangements, transportation, refreshments and meeting materials	6,000
	Printing of brochures, flyers, notices, technical reports, disclosure materials, and digital communication	4,000
	Awareness creation on stakeholder rights, grievance procedures, Code of Conduct, GBV/SEA/SH awareness and stakeholder engagement procedures	3,000
Construction	Periodic consultations with communities, institutions, contractors and affected stakeholders during construction activities	5,000
	Grievance intake, staffing, record keeping, complaint resolution meetings, communication and monitoring of grievances	5,000
	Monitoring visits, stakeholder feedback tracking, preparation of monitoring reports and documentation	7,000
Operation	Engagements on waste segregation, environmental monitoring, occupational and community health and safety awareness	4,000
	Monitoring stakeholder concerns, reporting on SEP implementation, disclosure of monitoring findings and corrective actions	6,000
Decommissioning	Consultations on decommissioning schedules, restoration measures, closure impacts and dissemination of closure information	2,000
	Final stakeholder feedback assessments, grievance closure, and documentation of lessons learnt	1,000
Total		43,000

APPENDICES

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| 1.0 | List of Meetings with National and Local Government & Institutional Stakeholders |
| 2.0 | List of Meetings with Representatives of Communities and Religious Organisations in the Project Area |

Appendix 1.0 List of Meetings with National and Local Government & Institutional Stakeholders

Date	Stakeholder	Venue	Participant(s)
<i>National/Regional Agencies</i>			
25/11/24	Accra Metropolitan Assembly	Accra Metropolitan Assembly, Accra	Victor Kotey (AMA focal officer for the project)
	GIZ – Project Team		Abraham Afful (Senior Project Advisor)
13/01/25	Environmental Protection Authority	EPA Head Office, Accra	Andriana N.K. Nelson (Ag. Director, Environmental Assessment and Audit Department) Godson Cudjoe Voado (Director, Human Resettlement)
14/01/25	Department of Community Development (Ministry of Local Government Decentralisation and Rural Development)	Head Office - Accra	Samuel Blebu (Deputy Director) Kwasi Yeboah (Assistant Director) Philomina Mensah (C.T.I) Mavis Obodai (Assistant Director) Amooba Emmanuel (Principal)
	Forestry Commission (FSD, Wildlife Division)	Head Office, Accra	Ernestina Annie (Public Relation Manager - WD) Grace Barnes (District Manager - FSD)
15/01/25	Council for Scientific and Industrial Research (CSIR) – Water Research Institute (WRI)	CSIR - WRI, Accra	Saada Mohammed (Research Scientist) Martha Agyemang (Assistant Research Scientist) Michael Kumi (Senior Research Scientist) Jude Offei Quansah (Assistant Research Scientist) Patricia Graham (Assistant Research Scientist) Franklin Obiri-Nyarko (Research Scientist) Emmanuel Adu-Ofori (Assistant Research Scientist)
16/01/25	Fisheries Commission	Head Office - Accra	Esi B. Quayson (Director) Dr Charles Teye (Deputy Director) Eunice Ofoli-Anum (Deputy Director) Rosina Williams (Deputy Director) Hayford Agbekpornu (Head M&E) Abena Asante (Deputy Director) Samuel Onkwona (Assistant Manager) Jennifer E. Viglo (Deputy Director) Emmanuel Amevor (Officer) Alexander Adu (Deputy Director)
24/02/25	Ghana National Fire Service (GNFS) - Korle Bu Divisional Office	Korle Divisional Office, Korle Bu	Evans Osei Owusu (Deputy Regional Commander)
<i>Private Sector Associations & Companies/Industries</i>			
13/01/25	Zoomlion - IRECOP	AMA - Oko Vanderpuije Conference Room	Hardy Edem Agbevey (Head of Quality Control - IRECOP)
	Jekora Ventures		Emmanuel Chainortey (Innovations Manager - Jekora Ventures)
26/02/25	Environmental Service Providers Association (ESPA)	Head Office - Accra	Eric Aryeetey (Project Assistant/Field Officer)
26/02/25	Accra Compost and Recycling Plant (ACARP)	ACARP Office - Nsawam	Malik K. Ganyo (Operations Manager) Matilda Owusu (Senior Researcher)
21/03/25	Triple C Company	Triple C Office, Mudor	Nii Sowah-Mensah (Administration) Stella Tsetse (Secretary)

21/03/25	Bukom Boxing Arena	Bukom Boxing Arena, Bukom	Edward Buxton (Facilities & Operations Manager) Rena Enkson (HR & Admin Sup.) Thomas Budu (HR & Admin Manager)
06/05/25	Waste Pickers Association	Phone call	Mr. Divine (Chairman) Mr. Karim (Organiser WIEDO)
<i>Local Authorities</i>			
15/01/25	Sempe Korle-Bu Mantse	Sempe Korle-Bu Palace	Ni Adotey Kan Fra (Mantse/Chief) Nii Laryea Korle Bu (Akwashongtse I) Nii Armah Quaye (Secretary) Nii Gonwulu (Akwashongtse) Nii Sanoi Sentse (Stool Father) Ransford Quaye (Assembly Member - Korle Gonno) Richard Taigo (Assembly Member - Korle Bu) Musah Zayad (Assembly Member - Amamomo)
17/01/25	Gbese Mantse (Paramount Chief of Gbese)	The Gbese Palace	Numo Ayitey Cobblah III
17/01/25	Korle Wulormor	The Wulormor Palace	Nii Ayibontey II
<i>Communities</i>			
18/01/25	Amamomo/Jamestown	Ghana Muslim Mission, National Headquarters, Korle Gonno	Residents, youth and women's groups, Persons with Disability, urban farming groups, market traders, food vendors, scrap dealers
	Korle Gonno		
	Korle Budor		
	Holy Fadama		
	Agbogbloshie		
	Mamprobi		
	Bukom		
21/03/25	Mudor	Church of Christ (Spiritual Movement), Mudor	
	Korle Wokon		
	Adadienkpoo		

Appendix 2.0 List of Meetings with Representatives of Communities and Religious Organisations in the Project Area

Date	Activity	Location/Venue	Participants
18/01/25	Consultation with community members: Participants include residents, youth and women groups, PWDs, urban farming groups, etc. (Participating communities include: Amamomo/Jamestown, Korle Gonno, Korle Budor, Holy Fadama, Agbogbloshie, Mamprobi, Bukom)	Ghana Muslim Mission, National Headquarters, Korle Gonno	Ni Adotey Kan Fra (Mantse/Chief) Nii Laryea Korle Bu (Akwashongtse I) Nii Armah Quaye (Secretary) Nii Gonwulu (Akwashongtse) Nii Sanoi Sentse (Stool Father) Ransford Quaye (Assembly Member - Korle Gonno) Richard Taigo (Assembly Member - Korle Bu) Musah Zayad (Assembly Member - Amamomo)
18/01/25	Focus Group Discussion with women, market traders, and food vendors	Ghana Muslim Mission, National Headquarters, Korle Gonno	Edward Buxton (Facilities & Operations Manager) Rena Enkson (HR & Admin Sup.) Thomas Budu (HR & Admin Manager)

Date	Activity	Location/Venue	Participants
18/01/25	Focus Group Discussion with informal service providers (Mortuary Road Scrap Dealers)	Ghana Muslim Mission, National Headquarters, Korle Gonno	Edward Buxton (Facilities & Operations Manager) Rena Enkson (HR & Admin Sup.) Thomas Budu (HR & Admin Manager)
21/03/25	Community Forum (Mudor Electoral Area): Communities include Mudor, Korle Wokon Adadienkpo	Church of Christ (Spiritual Movement), Mudor	Mr. Divine (Chairman) Mr. Karim (Organiser WIEDO)
22/03/25	Community Forum (Amamomo Electoral Area): Communities include Amamomo Agbogloboshie Old Fadama Timber Market	Charles Quartey Boxing Foundation, Amamomo	
23/03/25	Community Forum: Communities include Jamestown	Nii Lante Bannerman Community Centre, Jamestown Police Station Headquarters	
21/3/25	International Central Gospel Church & School (ICGC)	ICGC, Christ Temple, Abossey Okai	Nii Sowah-Mensah (Administration) Stella Tsetse (Secretary)
21/03/25	Abossey Okai Central Mosque	Abossey Okai Central Mosque, Abossey Okai	