

**INTEGRATED SAFEGUARDS DATA SHEET  
APPRAISAL STAGE**

Date ISDS Prepared/Updated: 03-APR-14

**I. BASIC INFORMATION**

**1. Basic Project Data**

<b>Country:</b>	Ghana	<b>Project ID:</b>	P145139
<b>Project Name:</b>	OBA Urban Sanitation Facility for the Greater Accra Metropolitan Area		
<b>Task Team Leader:</b>	Ventura Bengoechea		
<b>Estimated Appraisal Date:</b>	14-Apr-2014	<b>Estimated Board Date:</b>	N/A
<b>Managing Unit:</b>	AFTU2	<b>Lending Instrument:</b>	Small RETF Grant
<b>Sector:</b>	Sanitation (100%)		
<b>Theme:</b>	Urban services and housing for the poor (85%), Infrastructure services for private sector development (10%), Micro, Small and Medium Enterprise support (5%)		
<b>Is this project processed under OP 8.50 (Emergency Recovery) or OP 8.00 (Rapid Response to Crises and Emergencies)?</b>			No
<b>Project Financing Data (in USD Million)</b>			
Total Project Cost:	8.76	Total Bank Financing:	0.00
Total Cofinancing:		Financing Gap:	0.00
<b>Financing Source</b>			<b>Amount</b>
BORROWER/RECIPIENT			0.00
Local Communities			3.91
Other (GPOBA Grant)			4.85
Total			8.76
<b>Environmental Category:</b>	B - Partial Assessment		
<b>Is this a Repeater project?</b>	No		
<b>Is this a Transferred project?</b>	No		

**2. Current Project Development Objectives**

The Project Development Objective is to increase access to improved sanitation to people living in low income communities in the GAMA. This objective will be achieved by providing OBA subsidies to

service providers as an incentive to provide access to improved sanitation to low-income households. OBA subsidies will be provided for the construction of sanitation facilities and the provision of desludging services. OBA subsidies will bridge the gap low-income household's face when trying to install in-house sanitation facilities and stop open defecation or the use of public toilets. The project will also leverage financial resources from micro-financing institutions and support the scale up of business models that include soft loans for the provision of sanitation facilities in LICs of the GAMA. Thereby, supporting the objective of increasing access to private sector finance in the sanitation sector, and making environmental sanitation more affordable to the poor in GAMA.

### **3. Project Description**

The project includes two components: (i) OBA subsidies for sanitation sub-projects; and (ii) implementation support.

Component 1: OBA subsidies for sanitation sub-projects (US\$3.91 million). The OBA Urban Sanitation Facility will provide OBA subsidies to sub-project implementers for the provision of sanitation facilities and desludging services to benefit people living in LICs in the GAMA, mostly crowded in compound houses. The funds of the OBA Facility will be managed by the LGPCU within the MLGRD. The provision of sanitation services will be delivered by sub-project implementers that can be MMAs, NGOs, MFIs, equipment or desludging service providers, or community-based organizations.

Targeting to Low Income Communities (LICs) in the GAMA. The project will focus on priority LICs proposed by MMAs to benefit from gaining access to sanitation and water. The proposed LICs will have to pass the "low income" test, which will be validated by Ghana Statistical Services (GSS) using data from the (2011) Census. Overcrowding will be used as a key proxy for "low income" status, together with lack of access to improved sanitation. Therefore the proposed LICs will have to pass the test that 75 percent of the households live in one single room and 75% of the households do not have access to improved sanitation facilities. Interventions will be prioritized if necessary taking into consideration other factors such as density to maximize the impact. The implementation of the project is expected to be very challenging due to the cramped nature of the LICs and at the same time very rewarding due to the very positive impact of the provision of access to improved sanitation facilities in an environmentally and sustainable manner.

There will be OBA subsidies for desludging operations to ensure the sustainability of the services. Currently there exist various business models for the provision of sanitation facilities for LICs in the GAMA. Some of them include subsidies either covered by donors or NGOs or through the provision of lower interest rates through micro-credits. These programs have been implemented in a low scale but have the potential to be scaled up with the availability of additional funding. Most of these NGOs focus mostly in providing the sanitation facilities to households and social promotion about the need of proper sanitation, hygiene and behavioral change. In addition, they structure the financing model of the sanitation facilities with contributions and commitments from landlords and tenants. However, most do not support the operation phase when the facilities have to be emptied. There is a general impression that desludging services are available in the GAMA and that they operate in general terms well. Current desludging services are typically provided to higher income households and to public toilet facilities, which can pay for the services because they are run as a business. In the case of LICs, affordability constraints may result in manual emptying of septic tanks and sludge being dumped indiscriminately nearby, which could have a significant negative health and environmental impact, especially as a result of the increased access to sanitation. Also, the provision of sanitation facilities for compound houses may imply new challenges in terms of having the right equipment (e.g. smaller trucks) that is able to access cramped areas. The current desludging companies may not be willing to invest in the necessary

equipment unless they are given some assurance that the people in the LICs can afford their services. Therefore, the OBA urban sanitation facility proposes to partially subsidize both, the provision of the toilet facilities and the desludging operation to LICs to ensure the sustainability of the sanitation facilities. The cost of providing targeted subsidies to LICs for desludging is considerable lower than the health and environmental cost of continuing in the status quo that will continue to be the same if subsidies are provided only for the provision of the sanitation facilities and households are not able to afford the desludging services.

Component 2: Implementation support for project management and sub-project implementers (US\$940,000). This component will support three main activities (i) project management; (ii) technical assistance to sub-project implementers and MMAs; and (iii) Independent verification of outputs.

2.1 Project management (US\$470,000). Project management will be carried out by the same PCU of the IDA project, LGPCU. However, given the amount of work expected to promote the funds of the OBA Facility, assess the sub-project proposals, and support sub-project implementation, is expected that specific staff would need to be appointed to carry out these activities. Thus under this component the project can hire consultants to manage and operate the OBA Facility, cover operating costs needed to carry out activities in the field, and hire the external audit during the years of the Facility.

2.2 Technical assistance (US\$100,000). This component will support the design and implementation of solid sub-project proposals. Among the activities, the following are eligible for funding:

- (i) Preparation and dissemination of promotional material for sanitation facilities and campaigns to publicize the OBA Facility (e.g. workshops) with service providers. This is expected to last throughout the project, but mostly concentrated in the first two years of implementation.
- (ii) Support to sub-project proponents to identify, undertake due diligence, baseline data collection, financial analysis, and business plans for the preparation of sub-project applications.
- (iii) Evaluation of sub-project applications to enable MMAs/WMDs to undertake necessary due diligence on applicants' proposals.
- (iv) Support sub-project implementers to implement proposal including social promotion, technical support and establishment of sustainable arrangements for operating and managing sanitation facilities with private sector participation.

2.3 Independent verification (US\$370,000). This component will cover the cost of hiring an independent verification agent (IVA) that will carry out base line studies of sub-project proposals that have been approved by LGPCU before they start implementation to verify the conditions on the ground according to the sub-project proposals. In addition, the IVA will verify the outputs, agreed in the implementation agreement between the Facility and the sub-project implementers, upon which subsidy payments will be approved.

#### **4. Project location and salient physical characteristics relevant to the safeguard analysis (if known)**

The project would be implemented in low income communities of the Greater Accra Metropolitan Area, which encompasses 11 Metropolitan and Municipal Assemblies (MMAs) within the GAMA.

## 5. Environmental and Social Safeguards Specialists on the Team

Felix Nii Tettey Oku (AFTN3 )

Afshan Khawaja (AFTCS )

6. Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	<b>Yes</b>	<p>The project includes the construction of toilet facilities and the provision of desludging services. These activities are of a routine nature in general and do not have any significant, long lasting environmental impacts, or such impacts which would reach beyond the immediate project area. Most impacts would be restricted to the construction phase and can be readily mitigated with available and well-tested, standard techniques and measures.</p> <p>The key environmental risk associated with the toilet facilities is their long term operation. If the facilities are not properly operated, they could negatively affect ground and surface water quality, spreading waterborne diseases, and causing nuisances to the adjacent population by odors and vectors. These are known issues and will be duly considered in project design and in the operational arrangements.</p> <p>This project complements the IDA GAMA Sanitation and Water Project that will be financing collection and treatment facilities. Since the specific sites were not known, the IDA project prepared an Environmental and Social Management Framework (ESMF) and a framework EMP. The framework EMP is specific on the nature of mitigation measures, but generic on the location and dimensions of project activities since these were not known before appraisal. The ESMF provides clear guidance for the preparation of site-specific EIAs and EMPs during project implementation when specific environmental and social issues will be analyzed in detail and a comprehensive environmental and social impact assessment (ESIA) developed, as well as ESMPs with a long term operational planning perspective</p>
Natural Habitats OP/BP 4.04	<b>No</b>	
Forests OP/BP 4.36	<b>No</b>	

Pest Management OP 4.09	No	
Physical Cultural Resources OP/BP 4.11	No	
Indigenous Peoples OP/BP 4.10	No	
Involuntary Resettlement OP/BP 4.12	Yes	The project triggers the OP 4.12 as there could be land take due to the construction of toilet facilities. The project has prepared a Resettlement Policy Framework (RPF) which has been disclosed in country and at the World Bank's InfoShop. An RPF was used due to the fact that, at project preparation was not possible to identify specific sites for any project activity likely to lead to involuntary resettlement. The RPF developed by the Government of Ghana (GoG) will be used to guide the preparation of Resettlement Action Plans (RAPs) or Abbreviated Resettlement Action Plans (ARAPs), where required, after screening of project activities and sites for particular activities are done. RAPs/ARAPs would then be properly reviewed, cleared and disclosed as required prior to implementation.
Safety of Dams OP/BP 4.37	No	
Projects on International Waterways OP/BP 7.50	No	
Projects in Disputed Areas OP/BP 7.60	No	

## II. Key Safeguard Policy Issues and Their Management

### A. Summary of Key Safeguard Issues

#### 1. Describe any safeguard issues and impacts associated with the Restructured project. Identify and describe any potential large scale, significant and/or irreversible impacts:

The environmental and social impacts for the actual civil works for which this OBA Facility will provide subsidies to are expected to be, site-specific and can be managed to an accepted level. Potential environmental impacts have been identified in regards to the provision of sanitation facilities and desludging services. These activities may involve air and dust emissions, noise and vibration, open pits/trenches, disposal of construction waste and public safety/health concerns. Other impacts include interruption of natural drainage/hydrological patterns, water contamination, improper waste water disposal (boreholes) and sludge/fecal matter disposal (latrines). All these environmental impacts are manageable and could be contained.

An ESMF has been prepared to give guidance on mitigation and management of these impacts. From the social side, the project may require pieces of land for the construction of the sanitation facilities, as described above. This may temporarily affect peoples' livelihoods, assets and access. For this reason the borrower has prepared a resettlement policy framework that will serve as the guide to address any involuntary resettlement issues related to the project. It is however expected that there will be no major

issues and possible cases would be easily addressed.

**2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:**

Given the fact that in the targeted communities, one major challenge is available space, acquiring land for the facilities could prove a major challenge. However, the extensive consultations undertaken and the participatory design will serve to mitigate those challenges. In addition the RPF will provide guidance and will be the reference point to address any such cases. On the other hand, the project is likely to lead to expansion of economic activities and opening up of the respective local economies. The positive social, health and economic impacts and influence of lifestyles can be considerable especially for women, children and other vulnerable groups.

**3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.**

**4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described.**

In response to all the policies triggered, the GOG has developed an Environmental and Social Management Framework (ESMF) which has an Environmental Management Plan (EMP) for the IDA project that contemplated the activities to be funded by the OBA. The framework considers institutional arrangements required to implement the environmental actions. The EMP also provides basis for the identification and costing of mitigation measures against adverse impacts of sub-projects. All subprojects will have to meet environmental standards as described in the POM, ESMF.

On social safeguards, a resettlement policy framework RPF sets the framework for addressing any potential involuntary resettlement regarding land acquisition, livelihoods impact, and restriction of access and what type of compensation or support a particular type of affectation can receive. The RPF therefore assesses the existing legal and administrative framework, clarifies the principles underlying the policy OP 4.12. it also considers the different types of possible impacts and their corresponding mitigation measures, consultation processes and an outline for a resettlement action plan (RAP) should that become necessary during project implementation. One important aspect of the RPF is a mechanism for grievance redress and identification of training requirements for the implementing agency staff.

Mitigation measures will be enforced through contractor performance monitoring and evaluation as well as the overall implementation of the ESMF with participatory supervision from the MMAs, the affected persons and in collaboration with the EPA. Environmental Health Officers will help to ensure that proper clearances and approvals are obtained for sanitation sub-projects. The GAMA will also sensitize low income communities on the environmental aspects of their subprojects, and if needed train them to understand their roles and responsibilities. Project staff will be responsible for the safeguards which will be monitored and reported on as part of the projects periodic reporting. These measures will help to identify environmental and social impacts way ahead and institute measures to address them effectively and timely.

**5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people.**

In the course of the preparation of the RPF and ESMF, there was considerable consultation with metropolitan assemblies, communities, the EPA, Ministry of Local Government and Rural Development and other stakeholders. The RPF and the ESMF details out the level of consultations and issues raised during these consultation processes with a broad spectrum of stakeholders including community leaders and institutional representatives. Some of the concerns raised and which have been

incorporated into the final documents included issues on land acquisition, community sensitization and engagement with potential project affected people.

**B. Disclosure Requirements**

<b>Environmental Assessment/Audit/Management Plan/Other</b>	
Date of receipt by the Bank	17-Dec-2012
Date of submission to InfoShop	09-June-2014
For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors	
"In country" Disclosure	
Ghana	19-Dec-2012
<i>Comments:</i>	
<b>Resettlement Action Plan/Framework/Policy Process</b>	
Date of receipt by the Bank	20-Feb-2013
Date of submission to InfoShop	09-June-2014
"In country" Disclosure	
Ghana	7-March-2013
<b>If the project triggers the Pest Management and/or Physical Cultural Resources policies, the respective issues are to be addressed and disclosed as part of the Environmental Assessment/Audit/or EMP.</b>	
<b>If in-country disclosure of any of the above documents is not expected, please explain why:</b>	

**C. Compliance Monitoring Indicators at the Corporate Level**

<b>OP/BP/GP 4.01 - Environment Assessment</b>			
Does the project require a stand-alone EA (including EMP) report?	Yes [ ]	No [X]	NA [ ]
If yes, then did the Regional Environment Unit or Sector Manager (SM) review and approve the EA report?	Yes [ ]	No [ ]	NA [ ]
Are the cost and the accountabilities for the EMP incorporated in the credit/loan?	Yes [X]	No [ ]	NA [ ]
<b>OP/BP 4.04 - Natural Habitats</b>			
Would the project result in any significant conversion or degradation of critical natural habitats?	Yes [ ]	No [X]	NA [ ]
If the project would result in significant conversion or degradation of other (non-critical) natural habitats, does the project include mitigation measures acceptable to the Bank?	Yes [ ]	No [ ]	NA [ ]
<b>OP/BP 4.12 - Involuntary Resettlement</b>			
Has a resettlement plan/abbreviated plan/policy framework/process	Yes [X]	No [ ]	NA [ ]

framework (as appropriate) been prepared?	
If yes, then did the Regional unit responsible for safeguards or Sector Manager review the plan?	Yes [ ] No [ ] NA [ ]
<b>The World Bank Policy on Disclosure of Information</b>	
Have relevant safeguard policies documents been sent to the World Bank's Infoshop?	Yes [X] No [ ] NA [ ]
Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?	Yes [X] No [ ] NA [ ]
<b>All Safeguard Policies</b>	
Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?	Yes [X] No [ ] NA [ ]
Have costs related to safeguard policy measures been included in the project cost?	Yes [X] No [ ] NA [ ]
Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?	Yes [X] No [ ] NA [ ]
Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?	Yes [X] No [ ] NA [ ]

### III. APPROVALS

Task Team Leader:	Name: Ventura Bengoechea	
Environmental Specialist	Name: Felix Nii Tettey Oku	
<i>Approved By:</i>		
Regional Safeguards Coord:	Name: Alexandra Bezeredi	Date: 05/04/2014
Sector Manager:	Name: Alexander Bakalian	Date: 06/05/2014