



## 1. Project Data

<b>Project ID</b> P120636	<b>Project Name</b> GH-Land Administration - 2	
<b>Country</b> Ghana	<b>Practice Area(Lead)</b> Urban, Resilience and Land	
<b>L/C/TF Number(s)</b> IDA-48700,IDA-63450,TF-14256	<b>Closing Date (Original)</b> 31-Mar-2016	<b>Total Project Cost (USD)</b> 49,296,023.50
<b>Bank Approval Date</b> 31-Mar-2011	<b>Closing Date (Actual)</b> 31-Jan-2019	
	<b>IBRD/IDA (USD)</b>	<b>Grants (USD)</b>
Original Commitment	50,000,000.00	2,879,706.49
Revised Commitment	52,500,919.13	2,500,919.13
Actual	49,296,023.50	2,500,919.13

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## 2. Project Objectives and Components

### a. Objectives

The Project Development Objective (PDO) as stated in the Financing Agreement (Schedule 1, page 5) and the Project Appraisal Document (PAD, page 7):

**"To support the Recipient's efforts to consolidate and strengthen land administration and management systems for efficient and transparent land service delivery".**



This project was completed on October 19, 2018. Following a government request in February 2018 for Additional Financing (AF) for the project, which would have taken implementation over ten years (March 2011 to March 2021), an interim Implementation Completion Report (ICR), was submitted to the Board on October 19, 2018, and the interim ICR was reviewed by the Implementation Evaluation Group (IEG). The AF was approved on November 21, 2018. However, shortly thereafter, the government decided to address land sector issues with Public-Private Partnership (PPP) arrangements. The government and the Bank could not reach satisfactory agreement on the modalities of the PPP within the AF in 2019. On January 20, 2020, the Bank withdrew the AF at government request, and the project closed on January 20, 2020. Since the original credit was disbursed and the AF not utilized, implementation ceased at the end of 2018. This IEG review of the project, includes the modifications that were made following the completion of the Interim ICR.

Since Land Administration and Land management activities are closely interconnected, this review will not parse the objective into those two sub-objectives. Instead the review will group together key activities under three sub-objectives cited in the PDO; namely, .

**(i) consolidation and strengthening of land administration and management: (ii) efficiency: and (iii) transparency.**

**b. Were the project objectives/key associated outcome targets revised during implementation?**

Yes

**Did the Board approve the revised objectives/key associated outcome targets?**

Yes

**Date of Board Approval**

17-Apr-2015

**c. Will a split evaluation be undertaken?**

No

**d. Components**

There were four components (PAD, pages 9 - 11).

**1. Strengthening the Policy, legal and regulatory Framework for Land Administration.** The estimated cost at appraisal was US\$5.00 million. The actual cost was US\$3.67 million. This component planned to finance technical assistance activities aimed at land law reforms, preparing land regulations, and establishing new land courts. Activities in this component included: (i) capacity building for land use planning bills and related legislative instruments: (ii) recruiting legal experts for consultations with stakeholders on legal reforms, dissemination of information on new laws, and training stakeholders: (iii) capacity building of the judiciary to review court processes and activities aimed at reducing the level of disputes that go through alternative dispute resolution programs: and, (iv) capacity building for reporting land cases, scanning and storage of files.

**2. Decentralization and Improving Business and Service Delivery Processes.** The estimated cost at appraisal was US\$23.2 million. The actual cost was US\$32.1 million. This component planned at improving transparency and reducing the time and cost of delivering land services. Activities in this component



included: (i) financing studies on customary land practices: (ii) establishing Customary Land Secretariats (CLS) for addressing statutory land rights: (iii) streamlining registration procedures through Information Technology (IT) systems and (iv) creating a digital version of backup records.

**3. Improved maps and spatial data for land administration.** The estimated cost at appraisal was US\$31.5 million. The actual cost was US\$35.6 million. This component planned to develop spatial land transaction products. Activities in this component included: (i) developing policies for surveying, mapping and other spatial activities: (ii) preparing base maps: (iii) establishing a geodetic reference network: (iv) pilot boundary demarcation for customary and private land holders: (v) preparing land use plans: (vi) revaluing properties in selected district capitals: and (vii) a 'street addressing system' for urban management.

**4. Human Resource Development and Project management.** The estimated cost at appraisal US\$10.7 million. The actual cost was US\$12.7 million. This component planned at developing the human resources capacity and providing logistical support to land sector agencies, land owners and surveyors. Activities in this component included: (i) training key land sector agencies: (ii) capacity building of private and public service providers (surveyors, planners, real estate agents, tenant farmers and Non-Governmental Organizations (NGOs): and (iii) construction of a regional lands office in Kumasi: and (iii) project management support.

There was an unallocated component of US\$1.4 million at appraisal. The actual cost of this component was US\$0.8 million.

#### e. **Comments on Project Cost, Financing, Borrower Contribution, and Dates**

**Project cost.** The estimated cost at appraisal was US\$72.0 million. With the AF of \$20.8 million, the revised estimate was US\$92.8 million. The AF was not activated. The actual project cost was US\$49.2 million.

**Project financing.** The project was financed by an IDA credit of US\$50.0 million. AF of US\$35.0 million was approved on November 21, 2018. With this, the Bank financing for the project was US\$85.0 million. The AF was not activated. The actual amount disbursed at closure was US\$46.7 million. The difference between the appraisal amount of Bank financing and actual disbursements was due to exchange fluctuations between the US\$ and Special Drawing Rights (SDR) during implementation. At appraisal, there was a Trust Fund (TF) financing from the Canadian International Development Agency (CIDA) estimated at US\$15.0 million. This amount was reduced to US\$ 2.8 million during implementation. At closure, the CIDA contribution was US\$2.5 million.

**Borrower contribution.** The borrower contribution was estimated at US\$5.0 million at appraisal. There was no borrower contribution during implementation.

**Dates.** The project was approved on March 31, 2011, became effective on August 8, 2011, and was scheduled to close on March 31, 2016. An AF for \$US 20.8 million was approved on November 21, 2018 but was withdrawn by the Bank at government request on January 20, 2020. Given that the original credit was disbursed, and the AF not effective, implementation ceased at the end of 2018. The project formally closed on January 2020, once the withdrawal of the AF was communicated to the government by the Bank.



**Other changes.** There were four Level 2 restructurings during the project lifetime.

The first restructuring on April 15, 2013 reallocated funds between categories in the wake of funding from the CIDA TF.

The closing date for the TF was extended by an year from March 31, 2017, to February 28, 2018., through the second restructuring on February 28, 2018.

The following major changes were made under the third project restructuring on April 15, 2015, following the Mid-Term Review (MTR) on June 2014 and approved by the Board on April 17, 2015.

- The results framework was modified.
- The credit proceeds were reallocated in the disbursement schedule.
- The closing date was extended by 12 months from March 31, 2017 to February 28, 2018.

The fourth restructuring on February 26, 2018, extended the closing date by a year from February 28, 2018, to January 31, 2019, for preparing an AF agreement.

The AF was approved on October 19, 2018 and with AF, the closing date was extended to December 31, 2021. At government request, the AF was withdrawn on December 11, 2019, and the project formally closed on January 20, 2020 (although implementation ceased at the end of December 2018).

**Split rating.** Given that the AF was not activated and the PDOs remained unchanged. this review is not based on a split rating of objectives..

### 3. Relevance of Objectives

#### Rationale

**Country context.** Ghana's economy is agrarian, with 90% of its export earnings coming from land-related activities. However, land sector issues and tenure insecurity hampered investments in land. In urban areas, limited land supply, migration from rural areas and growing urbanization, contributed to growing demand for land.

**Sector context.** The statutory land delivery system and the traditional system for administering land customary tenure, were weak to deliver services commensurate with the growing demand for land. These issues had led to: (i) high incidence of land-related disputes in urban areas; (ii) inadequate tenure security which undermined land investments; (iii) depressed national and local government revenues; and (iv) indeterminate boundaries of customarily held land. Hence creating, an efficient land management system (defined as the process of managing the use of land) and a land administration system (defined as the ways the rules of land tenure are applied), was important to the government strategy.

(The PAD (paragraph 8) notes that there are four categories of land ownership in Ghana: (a) state land: (b) vested lands held in trust by customary authorities: (c) private lands in customary areas that are held in



customary tenure: and (d) private lands. Under current legislation, only land ownership under private lands required registration):

**Government strategy.** At appraisal, the PDOs were relevant to the government strategies articulated in the Second Generation Growth and Poverty Reduction Strategy, (GPRS -11), the Ghana Shared Growth Development Agenda (GSGDA) for 2010-2013, and the Food and Agriculture Development Policy (FASDEP). The GSGDA recognized the crucial importance of land management for attaining the objectives identified in the strategy. The FASDEP emphasized sustainable land management policies as essential for addressing agricultural productivity and environmental resilience.

**Bank strategy.** The PDO was aligned with the Pillar One of the Country Assistance Strategy (CAS) for 2008-2011: Improving private sector competitiveness, through among other things, improving access to land and secure property rights (CAS, pages 6 - 8). The PDO was consistent with the first pillar of the Country Partnership Strategy (CPS) for 2013-2016: Improving economic institutions, through enhancing governance of natural resources and strengthening land administration. This CPS was extended to 2018, when the project effectively ceased operations.

The Bank has executed several projects in Ghana, including the prior Land Administration Project, which laid the policy and institutional foundations, and piloted initiatives in land administration, that were to be scaled up in future operations. This project aimed at addressing the issues identified in the prior land administration project, such as, addressing land tenure insecurity issues, land administration issues due to undocumented ownership claims, weak land administration systems, lack of public outreach on land laws, updating maps, and addressing delays in courts through alternative dispute resolution mechanisms.

**Development Problem.** Ultimately, the project and the objective sought to improve business development and economic growth by strengthening land administration and management systems. The project design and the PDO were however broad. While the development problems align with Ghana's CAS and CPS, the project design failed to include specific aspects of the development problem and lacked clarity on the intended outcomes. The ICR (paragraph 78) notes that the lessons from the prior Bank-financed project were either not available or not considered, and hence the project did not sufficiently capture the intended transformation required to address land issues. The relevance of objective is rated as substantial.

## Rating

Substantial

## 4. Achievement of Objectives (Efficacy)

### OBJECTIVE 1

#### Objective

Consolidation and strengthening of land administration and management



## Rationale

**Theory of change.** The links between the overall project activities, outputs and outcomes were logical. Enacting legislation and legislative instruments for land use, developing spatial data for land administration, and training stakeholders, were aimed at improving land administration. Technical assistance aimed at improving adjudicating land cases, training judges, alternative dispute resolution mechanisms and automating land courts, were aimed at expediting the judicial process for resolving land issues. Decentralizing the land administration services through establishing Client Service Access Units and providing publicly the information on land transactions fees and charges, were expected to improve land transactions. The combination of these activities was likely to aid in strengthening land administration and management for privately held lands. While these outcomes were logical, the PDO indicators only measured the time required for registering private lands. The project activities were expected to benefit less than 10% of the potential beneficiaries, since 80% of land was held under customary arrangements and 70% of urban properties were unregistered.

**Outputs** (ICR, pages 14 - 21 and pages 64 - 78).

- A Land Bill was submitted to parliament following Cabinet approval on October 23, 2017. The legislation had not been enacted when the project closed.
- These activities were completed as targeted. (1).The legislative instrument (LI) for Administration of Stools Land Act and the Land Commission Act was submitted to the Attorney General (AG); and (2) Manuals and documents for guiding the Customary Land Secretariat (CLS) were submitted to the AG. .
- Eight customary land practices were identified when the project closed, below the revised and original targets of ten and fifty respectively.
- 88 Customary Land Secretariats (CLS) were established to provide support to local residents in customary land areas. This exceeded the target of 51.
- 36,178 land rights cases were recorded, exceeding the target of 25,000.
- 62,633 backlog of land title applications were cleared when the project closed, short of the target of 79, 472. The ICR (page 38) notes that backlogs have developed from 2010 to 2018, although the exact figures are not yet known.
- 307 cases were resolved by CLSs using the Alternative Dispute Mechanism (ADR), short of the target of 2,000.
- Maps were completed for two regions as per the revised target (although short of the original target of four).
- Five policies for national spatial data infrastructure, survey and mapping and geodetic reference network were developed as targeted. Design of the Geodetic Reference System (GRS) architecture was completed as targeted. Three spatial development frameworks and regional frameworks were prepared as targeted. One customary boundary was demarcated as targeted.
- The project identified streets and street names for municipal decision making. Street signs were in place for 3,782 streets in the Accra Metropolitan Area (AMA).This exceeded the 2,850. 120,000 property parcels were identified. There were no targets for this indicator.
- Human resource development plan was completed as targeted.
- 76 Civil Society Organizations were trained in Gender equality, land rights and monitoring and evaluation, exceeding the target of 15.
- 5,792 stakeholders (judges, lawyers, land sector staff, civil society organizations) were trained, exceeding the target of 120.



- 20 people (14 males and six females) undertook postgraduate studies and over 5,500 people (31% females) were trained. There were no targets for this indicator.

#### **Outcomes.**

- 82,438 land transactions were registered, exceeding the target of 30,000. Of this, 16,490 transactions were registered for females. There were no targets for this indicator.

Although the number of land transactions registered exceeded the target, this referred to only private land registration. Given that this covered less than 10% of the land, and over 80% of land was under customary arrangements and 70% of properties in urban areas were unregistered, the extent to which project activities contributed to the PDO of consolidating and strengthening land administration and management, is modest.

#### **Rating**

Modest

## **OBJECTIVE 2**

### **Objective**

To increase efficiency of land administration operations.

#### **Rationale**

#### **Outputs.**

- Dedicated land courts increased from six to twelve when the project closed. These included six dedicated land courts in Accra, three regional land courts in Sekondi, Kumasi and Tamale, and one sub-regional Land court in the city of Tema. There were no targets for this indicator.
- 645 judges and key staff (of which 127 were judges and magistrates, and 236 other court officials) were trained. There were no targets for this indicator.
- A fully functional information system called LUPMIS was developed, and was in daily use when the project closed.
- The implementation of an automated system for Land Commission activities, the Ghana Enterprise Land Information System (GELIS) was subject to delays, and this activity was not complete when the project closed.

#### **Outcomes.**

- The turn-around time in registering land deeds in Client Service Access Units (CSAUs) reduced from three months at the baseline to 2.11 months when the project closed. This did not meet the target of one month.
- The turn-around time registering land titles in CSAUs was expected to reduce from seven months to two months by project closure. There was no data on the actual time taken to register land titles when the project closed. The ICR (paragraph 49) notes that the turn-around times recorded in the results framework for land title registration for the baseline data was inaccurate, and not based on sound



methodology. Subsequent reporting also did not reflect the realities on the ground. The ICR notes that although some applications at the Land Registration Division are processed within a within a few months, the majority will take several years to process.

Given the modest achievement towards this objective for private land, the extent to which the project activities contributed to increasing efficiency is rated as modest.

**Rating**

Modest

**OBJECTIVE 3**

**Objective**

To improve transparency of land administration operations.

**Rationale**

**Outputs.**

- Seven Client Service Access Units (CSAUs) were established to provide customer services as per the revised target, although below the original target of 12.
- 111 public outreach and awareness activities were conducted, exceeding the target of 100. Five gender equality desks were established at regional centers, exceeding the target of four.
- Basic information on standard statutory fees, land transactions were publicly available when the project closed.

**Outcomes.**

- While the ICR reported on the actions that were taken for dissemination of information, the actions were output-oriented. There were also no indicators to measure the public's increased trust in land management or their perception of transparency.

Given the lack of credible evidence, the efficacy of improving transparency of land administration operations is rated as modest

**Rating**

Modest

**OVERALL EFFICACY**

**Rationale**





The turnaround time for land deeds improved slightly, but the project was unable to measure the turn around time for registering land titles. More problematic, the backlog of application of title registrations remained huge, and there were no credible indicators to measure transparency. Finally, the activities potentially impacted only on the private lands which represented under 10% the land in Ghana.

**Overall Efficacy Rating**  
Modest

**Primary Reason**  
Low achievement

### 5. Efficiency

**Economic analysis.** A cost-benefit analysis was conducted at appraisal and at closure for activities associated with improving maps and spatial data for Land administration. These activities accounted for 43% of the appraisal estimate and actual cost. The project benefits were expected to come from: (i) land investments due to tenure security: (ii) efficient registration systems: and (iii) improved land information, through geo-referenced land information, land use planning and street addressing. These benefits according to research conducted in Australia, were expected to have a positive effect on Gross Domestic Product (GDP). The Net Present Value (NPV) at closure was US\$65.8 million with a 10% discount rate, as compared to the NPV of US\$27.8 million estimated at appraisal. The ex post Economic Internal Rate Of Return (EIRR) was 22% as compared to the ex ante EIRR of 15%. The Cost-Benefit Ratio (CBR) of was 2.61 at closure, as compared to 1.45 at appraisal.

**Financial analysis.** At appraisal, the Financial Rate of Return (FRR) was calculated by comparing the difference in net revenue collected by the Land Commission (LC), with and without the project. The LC collected revenue in the form of stamp duty and fees collected for registration of deeds, titles, certified copies, etc. The ex post FIRR was 57% as compared to the ex ante FRR of 27%.

**Administrative and Operational issues.** The administration costs allocated under component four activities nearly doubled from US\$8.3 million at appraisal to US\$17.7 million at completion. All other component costs were lower than planned at appraisal. The project was delayed for a total of 34 months and the rise in administration costs reflect the administrative inefficiencies during implementation.

In sum, efficiency is rated as substantial, in view of the economic and financial analysis of the project.

### Efficiency Rating

Substantial

a. If available, enter the Economic Rate of Return (ERR) and/or Financial Rate of Return (FRR) at appraisal and the re-estimated value at evaluation:

Rate Available?	Point value (%)	*Coverage/Scope (%)
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Appraisal	✓	15.00	43.00 <input type="checkbox"/> Not Applicable
ICR Estimate	✓	22.00	43.00 <input type="checkbox"/> Not Applicable

\* Refers to percent of total project cost for which ERR/FRR was calculated.

## 6. Outcome

Relevance of the PDO to the government and Bank strategy is substantial. Efficacy of the objectives of consolidating and strengthening land administration and management systems, increasing efficiency and transparency of land administration systems, is modest in view of the limited achievements. Efficiency is substantial, in view of the economic and financial analysis. Taking these ratings into account, outcome is rated as moderately unsatisfactory.

### a. Outcome Rating

Moderately Unsatisfactory

## 7. Risk to Development Outcome

**Financial risk.** The ICR (paragraph 105) notes that while the Land Use and Spatial Planning Authority (LUPSA) financed through the project is budget financed, local planning activities were financed through construction permit fees. The legislation that established LUPSA also identified the need for a revolving fund to ensure that there is a regular source of funding for local planning. Given that the government had not yet set up a revolving fund to date, there is no secure basis of funding for local planning activities.

**Technical risk.** The ICR (paragraph 106) notes that while many of the Customary Land Secretariats (CLS) established under the project were working when the project closed, there are opportunities for abuse of their role for financial gains. The ICR also notes that to date the methods for auditing and ensuring social equity are not robust and need to be continually monitored. Similarly, the Land Commission and the Client Service Access Units showed little improvement in addressing the registry backlog. The improvement of the registration process needs specific investments to address the registration backlog.

## 8. Assessment of Bank Performance

### a. Quality-at-Entry

This project was a follow-up project to a prior Bank-financed project (Land Administration Project 1). At appraisal, several risks were identified including, risks associated with political commitment to a long term reform agenda, the risk that benefits associated with new technologies and ICT applications may not be sustained due to inadequate budgets, and risks that actions taken at the levels of customary land secretariats could diminish the rights of existing holders. Mitigation measures incorporated at design



included, a review of the cost recovery measures, increase in the share of revenue that land agencies are allowed to retain, and public awareness programs and stakeholder consultations. With these measures, project risk was rated as medium at appraisal (PAD, page 47). The implementation arrangements were appropriate, with the Project Coordinating Unit (PCU), housed in the office of the implementing agency - the Ministry of Land and Natural Resources (MLNR). The MLNR was to report directly to the National Project Steering Committee (NPSC), chaired by the Minister of MLNR. At regional level, the regional PCUs were responsible for coordinating regional activities. (PAD, paragraphs 37 - 39). Appropriate arrangements were made at appraisal for safeguards and fiduciary compliance (discussed in sections 9 and 10).

There were significant shortcomings at Quality-at-Entry. One, as indicated in section 3 above, the design failed to include specific aspects of the development problem into the objective, and this contributed to the lack of clarity on the project's theory of change. Two, the lessons from the prior financed land project were not considered at preparation. And the present project ended up repeating the same mistake as the prior project regarding complexity and overstating what was achievable. Three, given the wider spectrum of activities, specialists were required to address different aspects (including in, land law, land registration, IT systems, planning, valuation and property taxation). The ICR (79) notes the preparation team did not include people with expertise in land registration, property taxation, IT, and planning, and the Task Team Leader (TTL) was not a land specialist. Four, the design included many activities the targets for which were unrealistic given the resources and the backlog of applications for title registrations: there were M&E shortcomings (discussed in section 9).

### **Quality-at-Entry Rating**

Unsatisfactory

#### **b. Quality of supervision**

Eighteen implementation Status Results Reports (ICRRs) were filed over a project lifetime of ten years, implying on average, twice a year missions. The continuity of leadership was maintained with three Task Team Leaders (TTLs) during the project lifetime. The ICR (paragraph 88) notes that handovers were well planned and transitions were smooth. The support provided by the supervision team aided in fiduciary and safeguards compliance.

There were significant shortcomings in supervision. The ICR (paragraph 87) acknowledges that for most of the project period until the appointment of the last TTL, a land specialist did not lead the team, and the team lacked people with sufficient expertise on addressing issues relating to land title registry and IT systems development. Two, although problems with backlog at the title registry were identified, there was no effort at addressing this issue. Three, while the Mid-Term Review addressed many issues such as simplifying the PDO statement, they were neither reflected in the project paper, nor addressed through subsequent project restructurings. and Four, there was no follow-ups on financial commitments. For example, during the restructuring process, the government's financial commitment decreased from US\$5.0 million to US\$1.0 million, and ultimately to zero (ICR, paragraph 82).

Given the significant shortcomings in Quality at Entry and in Supervision, overall Bank performance is rated as unsatisfactory.



### **Quality of Supervision Rating**

Unsatisfactory

### **Overall Bank Performance Rating**

Unsatisfactory

## **9. M&E Design, Implementation, & Utilization**

### **a. M&E Design**

The Policy, Planning, Monitoring and Evaluation department of the Ministry of Land and Natural Resources (MLNR), was in charge of monitoring project performance (PAD, paragraph 40) and the regional Project Coordination Units (PCUs) were responsible for collecting regional level data (PAD, paragraph 42).

The results framework had several gaps. For example, key aspects of land ownership - such as informally held land - were not covered by the PDO indicators (ICR, paragraph 8). While the intermediate indicators provided insight into the activities that were conducted, they did not describe the intended outcomes of these activities. The lack of critical indicators inhibited the project's ability to document its results. For example, there was no indicator to measure contributions towards the higher level of improving business development and economic growth. The results framework focused primarily on proxy indicators related to the efficiency of registration deeds and titles registration. Transparency was only measured by whether information on the land administration was made publicly available. This besides being an output indicator, is also a very limited definition of transparency.

### **b. M&E Implementation**

The project did not adequately focus on implementing a monitoring and evaluation system that would enable the project to capture results. Although data was collected regularly, the MTR recommendations relating to the inadequacy of PDO indicators were not followed through. The project team did not use the opportunity to address the significant results framework flaws through restructurings.

According to the ICR (paragraph 96), the M&E specialist was not filled for long periods time. Further, the data quality checks on key PDO targets was inadequate. For example, data collected to report on turnaround time for land title registry was not adequately disaggregated according to the registration of transaction and first time registration of property rights (ICR, paragraph 59).

### **c. M&E Utilization**

The results framework was utilized to monitor outputs and focus on areas that were not achieving expectations.



In sum, M&E is rated as modest in view of the shortcomings in design and failure to take corrective actions during implementation.

### M&E Quality Rating

Modest

## 10. Other Issues

### a. Safeguards

The project was classified as a Category B (partial assessment) project, under the World Bank safeguard policies. Two safeguard policies were triggered at appraisal: Environmental Assessment (OP/BP 4.01): and Involuntary Resettlement (OP/BP 4.12) (PAD, page ix).

**Environmental Assessment.** An Environmental and Social Impact Assessment (ESIA) was conducted at appraisal. The PAD (paragraph 61) noted that adverse environmental impacts were expected to be minimal. An Environmental and Social Mitigation Plan (ESMP) was prepared and publicly disclosed at appraisal (PAD, paragraph 61). According to the ICR (paragraph 99), there was compliance with environmental safeguards and there were no adverse environmental impacts during implementation.

**Involuntary Resettlement.** The PAD (paragraph 35) noted that there could be loss of livelihood of people currently occupying land spaces that was earmarked for developing a regional office for the Lands Commission in Kumasi. An Abbreviated Resettlement Action Plan (ARAP) was prepared and publicly displaced at appraisal. The ICR (paragraph 98) noted that, although there was no physical displacement, six farmers were economically displaced. The ICR (paragraphs 98 and 99) notes that the that resettlement activities relating to economic displacement were completed with proper disclosure of information and involvement of stakeholders.

### b. Fiduciary Compliance

**Financial management.** An assessment conducted at appraisal, to assess the financial capacity of the Ministry of Lands and Natural Resources (MLNR), concluded that the financial management performance of the MLNR was satisfactory and was rated as moderate in the PAD (paragraph 51).

**Procurement.** A procurement assessment was conducted at appraisal. The procurement risk was rated as substantial in view of the lack of experienced staff in the MLNR.. The mitigation measures incorporated at design, included recruiting a procurement specialist with experience in Bank procurement policies, training staff, and preparing a procurement plan. (PAD, paragraph 52). The ICR (paragraph 101) notes that there were no internal investigations and there was compliance with procurement management.

### c. Unintended impacts (Positive or Negative)



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**d. Other**

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**11. Ratings**

Ratings	ICR	IEG	Reason for Disagreements/Comment
Outcome	Moderately Unsatisfactory	Moderately Unsatisfactory	
Bank Performance	Moderately Unsatisfactory	Unsatisfactory	There were significant shortcomings both in Quality at Entry and in Bank Supervision.
Quality of M&E	Modest	Modest	
Quality of ICR	---	Substantial	

**12. Lessons**

The ICR draws the following main lessons from the experience of implementing this project, with some adaptation of language.

**1. Establishing sound management through steering committees can help project management and component ownership.** In this project, the project established a steering committee to ensure that that five ministries could work together. Each ministry took responsibility for their mandate and made sure that their activities succeeded. Furthermore, the Human resources strategy and training plan were developed at an early stage, and this plan included arrangements for post-graduate training for twenty staff. Each staff member was given specific roles and associated tasks upon training completion. This method proved to be effective.

**2. It is necessary to consider lessons from previous projects, prior to finalizing the next phase.** Although this was a follow-up project, the draft of the Implementation Completion Report (ICR) did not include any lessons from the project. And this project ended up repeating the same mistakes as the prior project, especially regarding complexity and overstating what was achievable.

**3. Implementation and completion of major Information Technology (IT) systems was not realistic within a five year project cycle.** The IT system for this project was not completed on time and this impacted the overall achievement of the key project indicators. The design and feasibility analysis of IT systems need to be concluded prior to appraisal and be fully operational within a three year period. The ICR recommends that if the IT system is not contracted within the first year of the project, then the project should rethink and take appropriate actions to either simplify or downsize expectations.

**4. Although land projects can be highly beneficial if they are successfully completed, they can be complex, expensive and time consuming.** Teams need to seriously consider such projects from a practical implementation perspective, and include experienced land administration



and land management specialists both at preparation and during implementation. Professional expertise is especially needed at the team leader level.

IEG draws the following lesson.

**1. Lack of attention to monitoring and evaluation systems can impede the ability of the project to measure and document its achievements.** The ICR highlights as key areas of achievement of the program, human resources planning and training. However, the project failed to collect supplementary data to demonstrate success at the outcome level. This failure to pay attention to the monitoring and evaluation system led to inadequate indicators that could fully capture the project story and document its achievements.

### 13. Assessment Recommended?

No

### 14. Comments on Quality of ICR

The ICR is well written and provided sufficient information. The ICR candidly acknowledges the shortcomings in the theory of change, which did not clearly illustrate what was achievable with the project activities. It also very candidly acknowledges the significant shortcomings in Bank performance both at Quality at Entry and at supervision. The information provided in Annex Seven is very useful. The ICR generally follows the guidelines and derives good lessons from the experience of implementing this project.

One minor shortcoming with the ICR is its length. The main body of the text at 30 pages is twice the recommended length of 15 pages.

- a. Quality of ICR Rating**  
Substantial