CWSA- Small Towns and Water Supply Project (STWSSP)

Environmental and Social Management Framework (ESMF)-

Addendum Report

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1.0 Introduction

This addendum document to the Environmental and Social Management Framework (ESMF) for the CWSP II which was prepared in 2004, is intended to provide further guidance to stakeholders for the successful implementation of safeguards for the new sub projects, to be supported by the IDA additional financing. The sub projects will be implemented in eleven (11) new towns located in four regions of Ghana namely, Upper East, Upper West, Central and Western regions.

The ESMF is derived from two important documents namely (1) The World Bank safeguard policies on Environmental Assessment (OP 4.01) and Involuntary Resettlement (OP 4.12), and (2) The Ghana EPA Act 1994, Act 490.

The ESMF provided a general impact identification framework to assist communities screen sub-projects and institute measures to address adverse environmental and social impacts. The framework included general guidelines for mitigation, monitoring and institutional measures to be taken during construction and operation of the sub-projects.

The main purpose of this addendum is to identify and/or emphasize any special environmental and social safeguards particularly relevant to the new project towns in order to provide adequate guidance to surmount all anticipated and peculiar environmental and social challenges.

1.1 Objective of this addendum report

The objective of this report is to ensure sufficient guidance to the implementation of the environmental and social safeguards, and in support of the documentation for additional financing to the STWSSP.

1.2 Legal and administrative framework

The project is governed by the following legal and administrative provisions:

- Community Water and Sanitation Agency (CWSA Act 1998, Act 564)
- Ghana Investment Promotion Centre (GIPC Act 1994, Act 478)
- Environmental Protection Agency (EPA Act 1994, Act 490)
- Ghana Water Company Limited (GWCL Act, 1993 Act 461)
- Local Government Act, 1993 Act 462
1.3 Institutional roles and responsibilities

Various public and private institutions have roles to play in the implementation of the safeguards which are summarized below:

**Environmental Protection Agency:** The Agency has statutory mandate to ensure compliance with national legislation to protect the environment. It generally plays an advisory and regulatory role. Its regional offices will carry out field inspections of project sites, Screen project for safeguard issues, Provide environmental permits. It will further guide the project to ensure adherence to social and environmental safeguards as stated in permitting conditions and then monitor implementation of safeguards.

**Community Water and Sanitation Agency:** Statutory responsibility for water supply and sanitation services in small towns. It will play a general supervisory role and linkage with the EPA. The RWSTs will provide general support to the project and assistance to districts to ensure satisfactory contractual, technical, financial arrangements/ terms including environmental and social safeguards.

**District Assemblies:** Local development agents and project hosts and support to communities. The DWSTs will give direct support to communities including training.

**Water and Sanitation Boards:** Implementation of safeguard issues at operation stage. It is their responsibility to ensure continued statutory reporting to the EPA as owners of the facilities.

**Technical Assistance teams (consultants):** Design and supervision of construction of facilities. They will spearhead implementation of safeguard issues at community level and provide training till expiry of defect liability period.

**Contractors:** Implementation of safeguard issues at construction stage.

**NGOs:** The safeguard principles further recognize the important role advocacy groups could play to ensure a successful project. The involvement of NGOs in project cycle is therefore greatly encouraged.
2.0 Project region and districts

The additional financing is limited to sub projects in four (4) regions and nine (9) districts. The eleven (11) small towns are listed in the table below:

<table>
<thead>
<tr>
<th>No</th>
<th>Region</th>
<th>District (DA)</th>
<th>Project Town</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Upper East</td>
<td>Garu Tempane</td>
<td>Denugu- Daneorga</td>
</tr>
<tr>
<td>2</td>
<td>Upper East</td>
<td>Garu Tempane</td>
<td>Tempane- Yabreago</td>
</tr>
<tr>
<td>3</td>
<td>Upper West</td>
<td>Nadowli</td>
<td>Kaleo</td>
</tr>
<tr>
<td>4</td>
<td>Upper West</td>
<td>Lawra</td>
<td>Gabile</td>
</tr>
<tr>
<td>5</td>
<td>Upper East</td>
<td>Wa Municipal</td>
<td>Busa</td>
</tr>
<tr>
<td>6</td>
<td>Upper West</td>
<td>Wa Municipal</td>
<td>Charia</td>
</tr>
<tr>
<td>7</td>
<td>Upper West</td>
<td>Wa East</td>
<td>Fumsi</td>
</tr>
<tr>
<td>8</td>
<td>Western Region</td>
<td>Jumoro</td>
<td>Beyin</td>
</tr>
<tr>
<td>9</td>
<td>Western Region</td>
<td>Bia</td>
<td>Ajuaful</td>
</tr>
<tr>
<td>10</td>
<td>Central Region</td>
<td>Twifo Hemang</td>
<td>Twifo Mukwa</td>
</tr>
<tr>
<td>11</td>
<td>Central Region</td>
<td>Upper Denkyira West Municipal</td>
<td>Denkyira- Asikuma</td>
</tr>
</tbody>
</table>

3.0 Project description

The three main components of CWSP II are the following:

1. Community sub-projects;
2. Sector strengthening; and
3. Programme management.

The financing is intended for small towns through their DAs for construction of water and sanitation facilities and also finance technical assistance and community development activities. The latter is designed to strengthen community capacity to plan, implement, operate and maintain water and sanitation facilities in an effective and sustainable manner.

The sub-project cycle is as follows:

(1) promotion; (2) application; (3) community pre-selection; (4) proposal formulation; (5) proposal appraisal; (6) subproject approval and disbursement; (7) contracting; (8) construction and community development; (9) supervision and completion report; (10) operation and maintenance; (11) auditing, monitoring and evaluation.
Technical design criteria for water supply

The CWSA has technical standards and manuals for small towns water supply. The current population is used to size the distribution system with estimated consumption of 20 to 45 litres/cap/day. The design covers 10 year population. The installation of mechanised pumps will preferably be made in small towns that are connected to the national grid, while solar energy and generator sets will only be considered under exceptional situations. In general, water sources are prioritized as follows: (1) spring development; (2) groundwater; (3) surface water.

Technical options for sanitation

For small towns the options include (1) 1-2 seater KVI; (2) Pour Flash; (3) other traditional latrines available. In the case of schools, the options are 4-, 6-, and 10- seater KVIPs. A standard of 50 pupils per drop hole would be used and both sitting and squatting positions may be used. The use of local materials like bamboo and thatch etc will be encouraged.

4.0 Key safeguard issues

A generic list of potential project impacts and possible mitigation measures has been presented in the main ESMF to guide the safe implementation of the subprojects. These have so far been screened and presented in the baseline reports by the project consultants during the implementation of the earlier subprojects. The EPA, in its contribution has further screened these issues when they inspected these project sites as part of the permitting process. Following from all these, the following are identified in most cases as the key potential social and environmental concerns requiring attention in the four (4) project regions to be covered by the additional financing:

Preparatory and Construction phase

- Public safety issues arising from (1) poor housekeeping by contractors while on site, (2) movement of heavy vehicles, (3) exposure to open trenches;
- Removal and destruction of properties (crops, trees, structures) to locate facilities, and also on the RoWs during pipe laying;
- Decommissioning of existing old/ abandoned water points (wells) for public safety reasons and as potential groundwater contamination sources; and
- Land acquisition

Operation and maintenance stage

- Wastewater management;
- Facility use training/ management
The prescribed mitigation measures given in the ESMF are adequate to address these concerns. However, further guidance is emphasized in the following sections to ensure complete adherence to statutory and project provisions in implementing the safeguards.

5.0 Key mitigation measures required

The following guidance is given to implement the safeguards for a successful project. These are in accordance with the ESMF prepared in 2004 and further fulfill the World Bank safeguard policies on Environmental Assessment (OP 4.01) and Involuntary Resettlement (OP 4.12) and the Ghana Environmental Protection Agency Act 1994, Act 490. It is important to mention that all other potential impacts and mitigation measures as given in the main ESMF are still be applicable to these additional subprojects (reference Chapters 4 and 5 of main ESMF document).

5.1 Identification and listing of PAPs

Alternative site selection procedures and redesigning options must be followed to ensure that trees, food and cash crops as well as structures were avoided. Livelihood issues must be identified and addressed including concerns about communal facilities and cultural sites. Compensation arrangements as described in the Resettlement Policy Framework (RPF) must be followed and adequate grievance mechanisms instituted to avoid conflicts.

5.2 Documentation on land acquired for the project

Specially designed forms are available to properly record the donation of land for the subprojects by community members. These must be accessed and carefully used. All landowners must be adequately sensitized about their right to full compensation if they so desire. All land donated must be properly witnessed/ endorsed by the District Assembly, Traditional ruler, Assemblymen, and Water Board chairperson.

5.3 Acquisition of environmental permits

As per the legislative requirements of the country, the Ghana EPA is responsible for the permitting of projects and there is a clear procedural arrangement set up in the EA regulations. This requires that projects are foremost registered with the EPA using the prescribed EA1 forms. The EPA will subsequently visit the project site to confirm the accuracy of details given in the completed forms, and also the effectiveness of any proposed mitigation measures. For projects of the size of the STWSSP, a detailed environmental assessment report is not required and the completed registration form
(described as Form EA1) provides adequate documentation for the granting of the permit. The consultants and RWST must ensure that the projects have acquired environmental permits prior to the start of construction.

5.4 Safeguards reporting

Comprehensive baseline reports must be prepared at the regional level by the various technical consultants. In these reports, existing environmental, sanitation and social conditions must be captured for each project site and which will provide the basis to anticipate any adverse or positive impacts as well as mitigation plan and monitoring plans.

The baseline report will be used to complete the Ghana EPA EA1 forms for project permitting as demanded by law. Each subproject must be covered by such documentation and lodged with the regional EPA. Copies are to be made available at the RWSTs.

Tender documents must include environmental and social safeguard specifications to be addressed by Contractors in their bid quotations.

The CWSA has designed the reporting format for use by consultants and the WSDBs for mandatory periodic reporting on safeguard implementation. It is expected that, quarterly reports are prepared by the consultant during the construction phase. The reporting timelines are 12 and 18 months after project implementation for the Ghana EPA. The former would be prepared by the consultant whereas the latter by the WSDBs.

5.5 Training on safeguards

Various training programmes both informal and formal especially, workshops have been implemented during the project life. It is expected that the stakeholders in the four project regions have benefitted from these workshops which have been held at regional and national levels. The workshops resulted in awareness creation concerning the importance of environmental and social considerations and also as urgent requirements for the overall success of the STWSSP.
6.0 Management Plan and Costs

The action plan provided below confirms activities as well as roles and responsibilities to implement key safeguard issues raised in the sections above.

<table>
<thead>
<tr>
<th>Item</th>
<th>Safeguard Issue</th>
<th>Action required</th>
<th>Responsibility/players- Action</th>
<th>Project phase</th>
<th>Estimated Mitigation Cost</th>
<th>Responsibility - Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.0</td>
<td>Identification and listing of Project affected Persons</td>
<td>-confirmation of project designs -rapid socio- economic survey of community -census and profiling of affected persons -trigger resettlement action if required</td>
<td>-RWST (as lead) -TAs -DWST -WSDBs</td>
<td>Design stage</td>
<td>USD22,000</td>
<td>Project</td>
</tr>
<tr>
<td>2.0</td>
<td>Land acquisition</td>
<td>-confirmation of project designs -identification of property owners -sensitisation of owners wrt compensation rights -payment of compensation, if required -documentation on land</td>
<td>- TAs (as lead) -RWSTs -DWSTs -WSDBs</td>
<td>Design stage</td>
<td>USD65,000</td>
<td>Ghana Government</td>
</tr>
<tr>
<td>3.0</td>
<td>Acquisition of environmental permit</td>
<td>-preparation of baseline reports -completion of EPA Registration Form EA1 -screening of project -payment of processing and permit fees</td>
<td>-TAs (as lead) -RWSTs -EPA -CWSA -WSDBs</td>
<td>Design stage</td>
<td>USD8,000</td>
<td>Project</td>
</tr>
<tr>
<td>4.0</td>
<td>Safeguard reporting</td>
<td>-baseline reports -EPA registration forms -safeguard specifications (including EMP) in tender documents -monitoring returns</td>
<td>-TAs (as lead) -RWSTs -Contractors -DWSTs -WSDBs</td>
<td>Design, Construction, DLP, Operation Stages</td>
<td>USD10,000</td>
<td>Project</td>
</tr>
<tr>
<td>5.0</td>
<td>Training</td>
<td>-safeguard training workshops</td>
<td>-RWST (as lead) -TAs -DWSTs -WSDBs</td>
<td>Design, Construction, DLP, Operation Stages</td>
<td>USD25,000</td>
<td>Project</td>
</tr>
</tbody>
</table>

7.0 Conclusion

It is expected that the awareness created and experience gained by the various players from the implementation of STWSSP safeguards during the earlier subprojects, provide adequate foundation to ensure satisfactory compliance under this additional financing.