

SAFEGUARDS

AND THE SUCCESSFUL IMPLEMENTATION OF THE GAMA SANITATION & WATER PROJECT

GAMA SWP
TECHNICAL
Brief

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Introduction

This learning brief highlights how adherence to the Environmental and Social Safeguards by the World Bank, main financier of the Greater Accra Metropolitan Area Sanitation and Water Project (GAMA SWP) of the Ministry of Sanitation and Water Resources (MSWR) has contributed to a successful project implementation. The main objective of this brief is to contribute to sector learning through sharing of project implementation experiences with a focus on adherence to environmental and social safeguards.

Background



GAMA SWP wins 2018 WASH Excellence Award



The GAMA SWP picked up the 'Most Impactful Project of the Decade' at the 2018 National WASH Stewardship Awards organized by the Coalition of NGOs in Water and Sanitation (CONIWAS). The project successfully facilitated the provision of about 28,000 household toilets in 25 Metropolitan and Municipal Assemblies in the Greater Accra Region as at the end of 2020. In addition, 406 ultra-modern school WASH facilities, including toilets and water supply, were provided, more than eleven thousand low-income households connected to pipelines from the Ghana Water Company, not forgetting a giant step into the provision of drainage systems to reduce flooding in parts of Accra. In every component of the project, it was either the target was met or remarkably exceeded.

One major factor that contributed to the success of the GAMA SWP was the strict adherence to/compliance with the World Bank's Environmental and Social Safeguards requirements of the project and the National Environmental Assessment Regulation of the Environmental Protection Agency (1652) of the 1992 Constitution. This practice contributed enormously to the avoidance or minimization of adverse effects of project implementation on the environment, communities and people's livelihoods and rights.

What Are Environmental And Social Safeguards And Why?



A cordoned off construction site

A safeguard is **a law, rule, or measure intended to prevent someone or something from being harmed**¹. According to the World Wildlife Forum, the term “Environmental and Social Safeguards (or Standards)” is used by development institutions, international treaties, and agencies to refer to policies, standards and operational procedures designed to first identify and then try to avoid, mitigate, and minimize adverse environmental and social impacts that may arise during the implementation of development projects². When the World Bank, for instance, provides governments with financing to invest in projects, the aim is to ensure that the people and the environment are protected against potential adverse impacts from project implementation. In simple terms, the investment must do no harm but rather do good. This is done through policies that identify, avoid, and minimize risks or harm to people and the environment, and in the event some harm is unavoidable, leading to physical and economic displacements, the project affected persons must be identified and compensated for their losses.

Summary Of The World Bank’s *10+1 Environmental And Social Safeguards And Their Policy Objectives³

OP/BP	SAFEGUARD	POLICY OBJECTIVES
4.01	Environmental Assessment	Help ensure the environmental and social soundness and sustainability of investment projects. Support integration of environmental and social aspects of projects in the decision-making process.
4.04	Natural Habitats	Promote environmentally sustainable development by supporting the protection, conservation, maintenance, and rehabilitation of natural habitats and their functions.
4.09	Pest Management	Minimize and manage the environmental and health risks associated with pesticide use and promote and support safe, effective, and environmentally sound pest management.
4.11	Physical Cultural Resources (PCR)	Assist in preserving PCR and in avoiding their destruction or damage. PCR includes resources of archeological, paleontological, historical, architectural, religious (including graveyards and burial sites), aesthetic, or other cultural significance.

OP/BP	SAFEGUARD	POLICY OBJECTIVES
4.12	Involuntary Resettlement	Avoid or minimize involuntary resettlement and, where this is not feasible, assist displaced persons in improving or at least restoring their livelihoods and standards of living in real terms relative to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.
4.20	Indigenous Peoples	Design and implement projects in a way that fosters full respect for indigenous peoples' dignity, human rights, and cultural uniqueness and so that they (1) receive culturally compatible social and economic benefits, and (2) do not suffer adverse effects during the development process.
4.36	Forests	Realize the potential of forests to reduce poverty in a sustainable manner, integrate forests effectively into sustainable economic development, and protect the vital local and global environmental services and values of forests.
4.37	Safety of Dams	Ensure quality and safety in the design and construction of new dams and the rehabilitation of existing dams, and in carrying out activities that may be affected by an existing dam.
7.50	Projects on International Waterways	Ensure that the international aspects of a project on an international waterway are dealt with at the earliest possible opportunity and that riparians are notified of the proposed project and its details.
7.60	Projects in Disputed Areas	Ensure that other claimants to the disputed area have no objection to the project, or that the special circumstances of the case warrant the Bank's support of the project notwithstanding any objection or lack of approval by the other claimants.

*The additional (+1) is Public Disclosure

The World Bank Safeguards Policies Triggered By The GAMA Project

Out of the (10+1) World Bank Safeguards Policies which are used to guide safe development of projects that it funds, the GAMA SWP triggered three that were most suitable for its context:

Environmental Assessment Policy (OP 4.01).

This policy was triggered due to the intended civil works to be carried out which have the potential for environmental and social impacts during construction and operation periods. Projects of this nature have the possibility to cause soil erosion, noise generation, air pollution, waste generation and disposal, contamination of water bodies, occupational and public health, and safety, hazards among others.

Natural Habitat Policy (OP 4.04)

This policy was triggered because some of the projects had the potential to disturb the natural habitats of certain species of animals during implementation, for which reason they had to be protected.

Involuntary Resettlement Policy (OP 4.12).

This policy was triggered because of the likelihood of economic and physical displacement of persons and livelihood activities during project implementation.

Adhering to the World Bank Safeguards Policies

1. Skills development for knowledge on safeguards

The project has undertaken development of skills and knowledge for safeguards implementation and compliance for the relevant staff of the participating MMAs, Consultants, Contractors, and Community Stakeholders. The training covered among others: the safeguards requirements of the GAMA SWP, environmental and social impacts screening of newly proposed projects, approaches to stakeholder engagement, monitoring and mitigation measures for environmental and social impacts, compensation payment procedures, grievance redress, reporting of safeguards implementation, etc.



A safeguards training session for field workers

2. Appropriate Staffing for Safeguards

To ensure that all the Environmental and Social Safeguards Policies triggered are adhered to, the project has hired experienced safeguards specialists who coordinate the safeguards implementation and compliance activities of the project. Again, the project has also set up Safeguards Teams in each of the participating Metropolitan and Municipal Assemblies (MMAs) that support the Specialists in supervising and monitoring of the safeguards measures at the municipal and community levels during project implementation.

3. Effective safeguards planning/design and management system

Timely assessment of newly proposed project interventions and development of appropriate safeguards instruments for mitigation of the adverse environmental and social impacts during construction activities are carried out. The safeguards instruments prepared for addressing environmental and social impacts of the sub-projects to respond to OP 4.01 were: Environmental and Social Impacts Assessment (ESIA) and Environmental and Social Management Plans (ESMPs). In all, two ESIA and 26 ESMPs were prepared for the GAMA SWP.

4. Monitoring and Supervision

The Safeguards Specialists and Teams ensure regular monitoring visits to construction sites and support construction workers on safeguards activities implementation on the ground in order to avoid or minimize risks to the environment and people. Among others, the Safeguards Teams pay attention

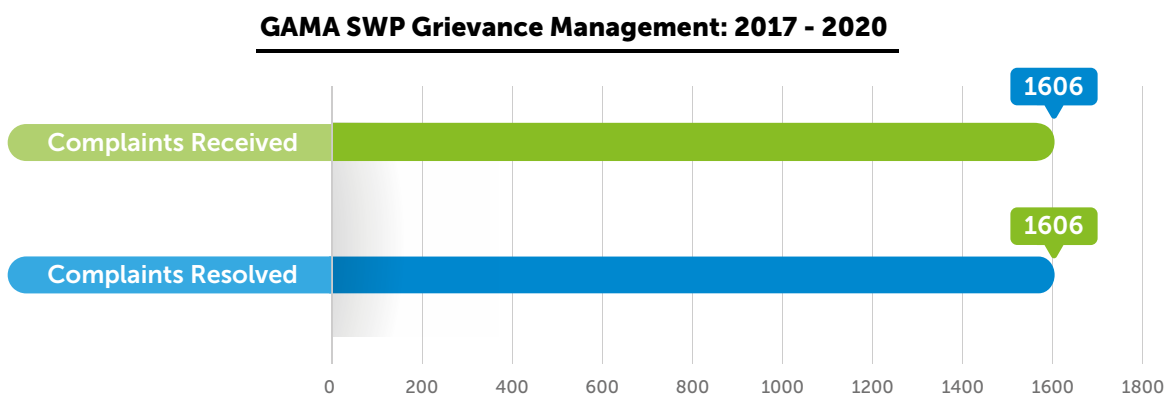
to destruction to the environment, obstruction to roads and access paths, displacement of people, disruption of people’s livelihoods, negative effects on people’s health and safety, effects on cultural heritage, and discrimination towards individuals and groups.

5. Fair and prompt payment of compensation to Project Affected Persons (PAPs)

Where compensation was required to be paid, the Project-Affected Persons (PAPs) were identified through preparation of Resettlement Action Plan / Abbreviated Resettlement Action Plan (RAP/ARAP) early in the project design stage. In all one RAP and ten ARAPs were prepared to respond to OP 4.12 and 968 PAPs were compensated. The appropriate compensation was paid to each PAP and on time prior to their vacation of the sites for the works to commence. Through this, conflicts and delays in the construction activities were rarely experienced.

6. Effective Grievance Resolution

One very key component of the Safeguards Strategy, which led to smooth and conflict-free project implementation, was the fair and prompt manner in which grievances of people affected by the sub-projects were addressed. This was achieved through the establishment of a three-tier Grievance Redress Mechanism (GRM) – a platform where all grievances from aggrieved individuals, groups or institutions can be channeled through the (1) local project community level (2) MMA level and (3) at the level of the MSWR/PCU. Where grievances could not be resolved at community level, they were forwarded to the MMA level and finally to the MSWR/PCU for final redress. All 1,606 grievances lodged by people were amicably resolved through the GRM and no grievance reached the courts as a final resort.



7. Effective Management of COVID-19 Disease during construction

The duration of the GAMA SWP coincided with the COVID-19 era. In order to prevent the spread of the disease among construction workers and adjacent communities, the project developed COVID-19 Health and Safety Guidelines for Construction Works. The Guidelines ensured and enforced among

others, wearing of nose masks by construction workers and visitors to the construction sites; provision of handwashing stand with liquid soap, running water and hand cleaning tissues, temperature measurements, and daily registration of workers and visitors to the construction site, among other protocols. Adequate budgetary provisions were made into the construction costs to take care of these protocols.

Main Outcomes From Adhering To The Safeguards



A happy household toilet beneficiary

Adherence to these standards and procedures ensured that major risks to the environment and people, which are also equally risks to the credibility of the project, were avoided, minimized, or at worst, compensated for. Because of this culture, the GAMA SWP was successfully implemented without major environmental issues raised, while all grievances from affected persons, groups or institutions were amicably resolved without any court action or civil society protests. No accidents, no illicit behaviours, no COVID-19 incidents were recorded.

Due to the successful implementation of the GAMA SWP, the Government of Ghana was able to convince the World Bank to provide additional financing to extend the project by four more years, this time, with focus on the second largest city in Ghana – Kumasi. There is therefore opportunity for low-income communities within eight MMAs constituting the Greater Kumasi Metropolitan Area

(GKMA) to access 30,000 household toilets, 120 institutional toilet facilities for selected schools and healthcare facilities, piped water into premises, and redevelopment and expansion of the Asafo Sewerage System within the Kumasi Metropolitan Assembly. Their counterparts within GAMA will also enjoy 12,000 more household toilets and 30 more institutional toilet facilities. These benefits are exclusive of the job opportunities available in about 24 small and medium scale enterprises in the Ashanti Region, in addition to a boost for local economies along the supply chain.

Lessons

Experience has shown how very good intentions to improve the living conditions of intended project beneficiaries can equally result in encroachments on their economic, environmental, and socio-cultural echo systems. With commitment and strict adherence to the World Bank's Environmental and Social Safeguards, the GAMA SWP has indeed learnt a few more lessons during project implementation.

- Every development project will likely pose problems for some people including residents or natives in beneficiary communities. These problems may stem from depriving one's access to land, displacement, disruption of businesses, blocking or impeding access to some locations, land degradation, environmental pollution among others.
- Early assessment for environmental and social impacts creates the environment for 'do no harm.'
- Project affected persons are usually less angry if they know where to make complaints about their grievances, and most importantly, if their grievances are adequately addressed with a high degree of professionalism.
- Extensive consultations with all necessary stakeholders on project intentions generate understanding, interest, confidence, and ownership and pave way for smooth project implementation.
- Project credibility is high if potential risks are pre-empted, and mitigation measures carefully planned for, and plans well executed.

Challenges

The project, nonetheless, experienced a number of challenges in its resolve to adhere to all the applicable Environmental and Social safeguards:

- Adherence to Environmental and Social Safeguards is time consuming and always has the potential to delay project implementation.
- Adherence to the safeguards is quite expensive as it requires professional staff, funds for impact assessments, funds for stakeholder consultations and publicity, funds for mitigation measures, and sometimes funds for compensation and even public disclosure.

- MMAs do not easily accept compensations for individuals and institutions especially when they consider their occupancy and/or activities as illegal. This sometimes results in delays in project implementation.

Case Study⁴

GAMA SWP HEALTH AND SAFETY MEASURES DURING RECONSTRUCTION OF MALLAM JUNCTION DRAINAGE SYSTEM

The Problem

In 2018, the Ministry of Sanitation and Water Resources (MSWR) agreed to support the reconstruction of the Mallam Junction Drainage System to end the perineal flooding on the Accra Cape Coast Highway through the GAMA SWP.

Main Interventions Involved

- Construction of a 150mx4mx2.5m double cell drain across the seven lane NI Highway
- Construction of a reinforced open rectangular channel of size 80mx7mx2.5m
- Deepening and widening of 230m long earth channel

Safeguards Measures Implemented

Health and safety of people

With project located on one of the busiest roads in Ghana, the GAMA SWP, in addition to meeting environmental safeguards, was compelled to integrate health and safety standards in project planning, design and implementation so that the health and safety of construction workers, supervisors, motorists, pedestrians, the business community and the general public would not be compromised. Active project construction areas were secured and hoarded, and there were periodic monitoring and site review meetings. There was also the use of effective situation-friendly construction methodology including the use of pre-cast units to save time.

Traffic management planning

Traffic Management Planning involved installation of signages, provision of alternative routes and diversions, involvement of the Motor Transport & Travel Directorate (MTTD) of

the Ghana Police Service in managing human and vehicular traffic. Selected works were deliberately scheduled for the night to take advantage of off-peak traffic times.

Effective stakeholder Engagement

Beyond the project-affected persons, other stakeholders engaged include the Ghana Police Service, Transport Unions, Telecommunication Companies, Local Government Institutions, National Security, Ghana Highway Authority, and Media Houses.

Compensation of project-affected persons

Project-affected persons were identified and engaged; those who qualified for compensation were settled on timely basis before the start of the project.

Project Communication Plan

There was a dedicated project communication plan involving a media tour of the project site, mass and social media discussions and publications, development and dissemination of flyers, videos, brochures for continuous public education.

Results

Even though the project interrupted the activities of millions of people that live around or commute along the busy road, there were no major delays in project implementation and no accidents or significant health hazards were recorded. There was massive public support, successful traffic flow with minimal interruptions, and reduced risk to public image of the Ministry and the Project.

Conclusions

Despite the challenges with and the cost of adhering to Environmental and Social Safeguards, it is still a worthy effort since the credibility of a project is enshrined in how well it has been implemented with little or no compromises made to people and the environment. After all, a development project is meant to improve the living conditions of the target beneficiary and not to harm them.

The GAMA SWP has been quite successful since it has managed to implement the project with little or no concerns raised about the environment and with virtually no legal actions against the Ministry. It is worth spending time and resources on protecting the environment and making people happy rather than spending time and resources in the law courts.

Commitment and adherence to the World Bank’s Environmental and Social Safeguards has therefore been a major factor in the successful and litigation-free project implementation, resulting in hundreds of thousands of people living in low-income communities gaining access to improved sanitation and drinking water. It would therefore be very appropriate for knowledge on safeguards to be integrated into the planning schemes of MMDAs.

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