MINISTRY OF EMPLOYMENT AND LABOUR RELATIONS

GHANA JOBS AND SKILLS PROJECT

REDEVELOPMENT OF LABOUR DEPARTMENT HEAD OFFICE

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

Osu – Korle Klottey Municipality

Greater Accra Region

GHANA JOBS & SKILLS PROJECT

May 2023

List of Acronyms

AIDS	Acquired Immunodeficiency Syndrome	**KoKMA**	Korle Klottey Municipal Assembly
AMSU	Accra Metro Sewage Unit	**LD**	Labour Department
		LPG	Liquefied Petroleum Gas
DW	Department of Works	**MELR**	Ministry of Employment and Labour Relations
DSWCD	Department of Social Welfare and Community Development		
EA	Environmental Assessment	**MoF**	Ministry of Finance
ECG	Electricity Company of Ghana	**NADMO**	National Disaster Management Organisation
EHS	Environmental Health and Safety	**OP**	Operational Policy
EHSD	Environmental Health and Sanitation Departments	**OSH**	Occupational Safety and Health
EPA	Environmental Protection Agency	**PAP**	Project Affected Persons
ESMP	Environmental and Social Management Plan	**PCU**	Project Coordinating Unit
ESSS	Environmental and Social Safeguards Specialist	**PIU**	Project Implementation Unit
FID	Factories Inspectorate Department	**PPDD**	Physical Planning and Development Department
GAMA	Greater Accra Metropolitan Area	**PPME**	Policy Planning Monitoring and Evaluation
GJSP	Ghana Jobs and Skills Project	**PWD**	Persons With Disability
GLMIS	Ghana Labour Market Information System	**SEA**	Sexual Exploitation and Abuse
GNFS	Ghana National Fire Service	**SH**	Sexual Harassment
GPS	Ghana Police Service	**SDG**	Sustainable Development Goals
GRC	Grievance Redress Committee	**TIA**	Traffic Impact Assessment
GRM	Grievance Redress Mechanism	**TLD**	Traders at the Labour Department
GTSS	Grid Tied Solar Systems	**WB**	World Bank
HIV	Human Immunodeficiency Virus	**WBG**	World Bank Group
ILO	International Labour Organisation	**WMD**	Waste Management Department
KoKMA	Korle Klottey Municipal Assembly	**WEEE**	Waste Electronic and Electrical Equipment

Executive Summary

Background

The Government of Ghana, through the Ministry of Finance (MoF), has received financing from the World Bank for the implementation of the Ghana Jobs and Skills Project (GJSP). The Project Development Objective is to support the Government of Ghana in skills development and job creation. The Ministry of Employment and Labour Relations (MELR) is implementing the Component 3 of GJSP. Under Subcomponent 3.2 of Component 3, the project will support the Redevelopment of the Old Labour Department Head Office, located in the Ministerial Enclave, Osu-Accra, into a four (4)-storey building modern office complex.

Project Justification

The Labour Department Head Office in Accra was constructed in the 1960s to serve as the focal centre for coordinating the activities of the regional and district offices. Due to the lack of significant renovation on the Labour Department Head Office structures, the facility has developed major structural defects, which expose workers, clients and other facility users to public health and safety risks. Besides the structural defects, the Labour Department Head Office facilities are not accessible to persons with disabilities (PWDs).

The Ministry of Employment and Labour Relations intends to redevelop the facility to befit the status of the national head office of the Labour Department. The facility, upon completion, will have an ultra-modern office complex and mixed-use facility, which blends a combination of offices, and conference rooms, with disability-friendly features.

Objectives/Purpose of the ESMP

The prime objective of this Environmental and Social Management Plan (ESMP) is to bring the project into compliance with applicable national environmental and social legal requirements and the World Bank's Environmental and Social Safeguards Policies.

Project Description

The proposed project will cover a gross floor area of 2300m^2 and will have the following key facilities and features, which will be accessible to PWDs:

- Offices,
- Labour Complaint Centre,

- Conference rooms;
- Washrooms;
- Storerooms;
- Reception/Waiting Area; and
- Car Park.

Pre-construction phase activities include the following:

- Geo-technical studies;
- Feasibility studies, including surveying, concept and general design of the project;
- Structural and architectural designs;
- General layout planning;
- Compensation and resettlement of Project Affected Persons (PAPs); and
- Relocation of Labour Department staff to a temporary office at NDK Building (located about 1km from the project site).

The construction phase activities will last about thirteen (13) months with an estimated (60) workers. The main activities will involve the following:

- Mobilisation of construction workforce;
- Equipment mobilisation and raw material sourcing;
- Disconnection of Utility Infrastructure;
- Demolition and land preparation activities;
- Erecting of structure;
- External works; and
- Utility provisions.

The decommissioning activities will involve the following:

- Dismantling and evacuation of temporary structures and storage facilities;
- Evacuation of waste of the site; and
- Evacuation of heavy-duty machinery/equipment off the project site.

The structure's functionality, utility facilities, internal washrooms and other auxiliary facilities will be evaluated during the post-construction phase.

The management activities during the occupancy phase will include:

- Waste management provision;
- Fire control system;
- Rainwater harvesting system; and
- General maintenance of the facility.

The applicable national and World Bank policy, legal and institutional framework reviewed include the following:

National Environmental Policy and Related Requirements

- Ghana's Environmental Policy (2013);
- Environmental Protection Agency Act, 1994(Act 490);
- Environmental Assessment Regulations 1999 (LI 1652);
- Fees and Charges (Amendment) Instrument, 2019 (LI 2386);
- Ghana National Climate Change Policy, 2013; and
- Hazardous and Electronic Waste Control and Management Act, 2016 (Act 917)

National Environmental Quality Standards

- Ghana Standards for Health Protection – Requirements for Ambient Noise Control (GS 1222, 2018); and
- Ghana Standards for Environment and Health Protection – Requirements for Ambient Air Quality and Point Source/Stack Emissions (GS 1236, 2019)

Framework for National Planning and Development

- Land Use and Spatial Planning Act, 2016 (Act 925);
- Local Governance Act 2016 (Act 936);
- Ghana Building Code (GhBC GS 1207:2018);
- Persons with Disability Act, 2006, (Act 715);

- National Gender Policy, 2015; and
- Renewable Energy Act, 2011 (Act 832)

National Labour, Safety and Health Requirements

- Factories, Offices and Shops Act, 1970 (Act 328);
- Draft Occupational Safety and Health Policy of Ghana (Draft, 2004);
- Labour Act, 2003 (Act 651);
- Children's Act 2016 (Act 937);
- Workmen's Compensation Law;
- National Health Policy, 2020;
- Road Traffic Act, 2008 (Act 761);
- Ghana National Fire Service Act, 1997 (Act 537);
- Fire Precaution (Premises)(Amendments) Regulations 2016 (LI 2249);
- National HIV and AIDS Policy; and
- National Workplace HIV/AIDS Policy.

World Bank Requirements

- Environmental Assessment Policy OP4.01;
- Involuntary Resettlement Policy OP4.12; and
- WBG General Environmental Health and Safety Guidelines.

A comparison of the applicable Environmental and Social Safeguards of the World Bank and Ghanaian policies and legislative instruments was carried out, with the view that the one that provides the highest and better protection of the environment would be adopted and implemented.

Institutions with roles relevant to the ESMP implementation include the following:

- Ministry of Finance;
- Ministry of Employment and Labour Relations;
- Ministry of Local Government and Rural Development;
- Environmental Protection Agency.

Environmental and Social Baseline Information

The baseline information reviewed included the following:

- Physical Environment
    - Geographic location;
    - Climatic conditions;
    - Topography;
    - Geology and soil;
    - Seismic risk assessment;
    - Ambient air quality; and
    - Ambient noise levels.

- Biological Environment
    - Vegetation; and
    - Fauna Composition of the project area.

- Socio-Economic Baseline
    - Population and demographics;
    - Land use;
    - Socio-economic activities;
    - Traffic conditions and forecast;
    - Health;
    - Water and sanitation; and
    - Electricity.

Stakeholder Involvement

The following stakeholders were engaged as part of the ESMP preparation:

- Environmental Protection Agency;
- Labour Department;
- Korle Klottey Municipal Assembly
    - Department of Works
    - Department of Social Welfare and Community Development
    - Environmental Health and Sanitation Department
    - National Disaster Management Organisation
    - Physical Planning and Development Department
- Ghana Police Service;

- Accra Metro Sewage Unit
- Ghana National Fire Service;
- Ghana Water Company Ltd;
- Electricity Company of Ghana;
- Petty Traders and Food vendors at the Labour Department; and
- Ghana Federation of Disability Organisations.

Environmental and Social Risks and Impacts and Mitigation

The potential environmental and social Risks and impacts and mitigation are presented in the table below:

Impact	Source	Mitigation Measure
Pre-construction Phase		
Socio-economic and Livelihoods Impacts	Disruption of livelihoods activities by construction works	• Preparation of an Abbreviated Resettlement Action Plan • Consultations with affected groups or persons • Ensuring a functional Grievance Redress Mechanism
Disruption of Utility Services	Disconnection/disengagement of utility lines	• Coordinating with affected utility providers to disconnect or disengage the utility infrastructure
Construction Phase		
Waste handling and disposal impacts	• Old asbestos roofing sheets	• Safe handling and disposal of asbestos roofing sheets measures (Details attached as Appendix 4)
	• Construction waste	• Segregation of domestic waste • Giving out metal waste to accredited scrap dealers • Contracting the services of a registered waste management company to cart waste from the site
	• Domestic waste	• Provision of coded waste bins • Segregation of waste • Contracting the services of a registered waste management company to cart waste from the site • Sensitisation of construction workers on good housekeeping practices, such as waste segregation
	• Liquid waste – faecal matter and urine	• Provision of mobile toilet facilities
	• Contaminates/hazardous waste	• Servicing of construction machinery and equipment offsite by a third-party contractor offsite
Potential Vehicular Traffic and Accidents	• Haulage of construction materials/equipment and construction waste from the project site during peak hours	• Drivers with a Valid Driving License D will be engaged • Haulage of construction material/equipment and construction waste will be done during off-peak hours or weekends, or holidays

	• Overspeeding and careless driving • Breakdown of haulage vehicles in transit obstructing traffic and causing accidents	• Speed limits will be enforced • Mobile phone numbers will be posted on haulage trucks for the general public to report cases of reckless driving • Broken-down vehicles will be towed promptly
Potential impacts from raw material sourcing	• Extraction of construction materials,	• Construction materials will be obtained from only EPA Certified Suppliers
Loss of Vegetation Cover	• Felling of trees	• Seek approval from EPA/Department of Parks and Gardens Department for felling seven (7) trees • Replace seven (7) trees to be felled during clearing/construction with twenty-one (21) of the same species • Avoid excessive clearing (Only demarcated sites approved by the Project Consultant and marked trees by the EPA should be cleared)
Potential Impacts on Air Quality	• Demolition activities • Stockpiling of demolished waste on site • Transportation (including and off-loading) of sand and other aggregates • Adherence to a speed limit of (30km/hr) by drivers when moving on untarred roads along communities	• Dousing the sandcrete structure with water before demolition • Provision of PPE (nose masks and eye goggles) to workers • Undertaking demolition activities during weekends or holidays • Carting of demolished waste from the site promptly • All trucks and other equipment will follow a planned maintenance regime, and records kept • Provision of nose masks to construction workers • Trucks hauling excavated spoil and fine aggregates construction materials will be covered with tarpaulin to prevent fly-offs • Haulage trucks will be required to reduce speed to 30km/h when approaching untarred roads.
Public Occupational Health and Safety Risks	• Use of construction machinery and equipment • Exposure to chemicals • Unavailability of PPE • Poor enforcement of PPE usage • Poor housekeeping • Medically unfit workers	• Cordon off (hoard) the site and prevent unauthorised entry by employing private security • Provision of safety signages • All workers will undergo medical screening before they are employed • Supply and enforce the use of Personal Protective Equipment (PPE), such as hard hats, reflector jackets, and overalls for all workers and others such as nose masks, hand gloves and ear plugs appropriate for specific tasks • Sanctioning workers who fail to use PPE • Employ a Health and Safety Officer • Scaffolding must be used for activities that will be above 2 metres • Scaffolding must be on a solid footing, not on boxes, loose bricks and stones, etc. • Provision of First Aid Kits on site • Training of workers to administer First Aid • Visitors to the construction site will be required to register in a logbook

		• Visitors to the construction site will be provided with the appropriate PPE (safety gear, e.g., reflector vests, hard boots, and helmets) • Reverse alarms will be fixed on construction vehicles and other movable equipment.
Noise and vibration impacts	• Demolition activities • Use of construction equipment • Movement of haulage trucks	• Major construction activities (e.g., demolition) which generate noise will be undertaken after 7pm or during weekends or holidays • Use of earplugs or ear muffs by workers operating or working close to heavy machinery such as excavators and compactors • Use of high-dexterity hand gloves when working with vibrating equipment • Operators of machinery and vehicles will be required to switch off idling engines • All trucks and other equipment will follow a maintenance regime, and records kept • Haulage of construction and waste material will be undertaken after 7pm
Potential Fire Risks	• Cigarette butts, naked flames	• Acquisition of Fire Permit from GNFS • Post caution signs like 'No Smoking', 'Switch Engines' and 'Mobile Phones Off', 'Emergency Hotlines', etc., conspicuously in fire-sensitive areas. • Provision of firefighting equipment; • Construct concrete floor and bunded area for fuel storage to contain spills and prevent unauthorised entry; • Train construction workers as fire marshals to fight fire in the event of an outbreak; and • Conduct weekly toolbox meetings on fire safety.
	• Ignition sources • LPG • Faulty electrical equipment	• Post caution signs like 'No Smoking', 'Switch Engines' and 'Mobile Phones Off', 'Emergency Hotlines', etc., conspicuously in fire-sensitive areas. • Install smoke detectors and heat alarms in various offices and facilities; • Provide firefighting equipment such as fire beaters, extinguishers, foam concentrates, hose reels, dry chemical powder, and CO_2 fire extinguishers at vantage points and generator plant areas, and various offices and facilities; • Restrict cooking and smoking to designated areas • Provide fire emergency exits and assembly points • Provide hydrants at strategic locations within the premises of the facility • Conduct annual firefighting drills and search-and-rescue operations to check the efficiency of emergency response and preparedness plans.
Risk of Potential Spills	• Transportation of chemicals • Unsecured containers	• Ensure that all hazardous substances and materials, such as thinners and paint, are stored in appropriate

		locations with impervious surfaces and adequate secondary containment. • Install oil traps on drains from storage areas and work zone; • Construction workers are to be provided with adequate training on the use, storage and handling of hazardous substances; • Place drip pans under small equipment and vehicles during servicing and routine maintenance to collect waste oils/fuel and lubricant for re-use or sell to other entities, e.g., chain saw and/or machine operators • Undertake off-site repair and maintenance of haulage vehicles and large equipment • Portable spill containment and clean-up equipment are provided at appropriate locations on site, and training in the use of the equipment • Material Safety Data Sheets (MSDS) for each material in stock should be kept within the storage area where substances are stored and at the site office • Develop a procedure for managing the discovery of contamination, such as daily inspection of oil/fuel and lubricant storage areas and equipment; and • Where there is evidence of spillage and leakage, assess the activities carried out on-site and review the operational procedures in place. Modify these where appropriate.
Potential poor working conditions	• Payment of salaries below the prevailing minimum wage • Poor working conditions	• Workers will be paid according to the prevailing national minimum wage • Work will commence at 8.00 am and close at 5.00 pm with a mandatory one-hour break • Workers will be provided with Contracts specifying the type of job they have been hired for and their working conditions (conditions of service) in line with The Labour Act, 2003 (Act 651) • Workers will be hired (employed) based on a structured system of hiring through a human resource officer/manager/agency
Potential use of child labour on site	• Recruitment of minors	• Contractors will check Birth Certificates and other identity cards of potential employees before being offered employment and in the absence of a birth certificate and other identity cards, responsible persons/opinion leaders in the applicant's community, e.g., religious leaders, Civil Servants will have to guarantee that they are above 18 years as part of the recruitment processes • A Code of Conduct prepared for the Project Contractor and Sub-Contractor employees will inform them that persons 18 years and below are not allowed on site and the sanctions for Child Labour.

Incidence of Gender-Based Violence and Sexual Exploitation	• Site workers and residents of the project communities	• Contractual Clauses (see Appendix 5) on mandatory and regular training for workers on required lawful conduct and legal consequences for failure to comply with laws on non-discrimination and GBV; • Contractual Clauses with a commitment to cooperate with law enforcement agencies (DOVVSU) investigating cases of gender-based violence will be inserted into the Contract documents of the Contractor and Supervising Consultant • The Contractor will be required to consider alternative work schedules or shifts to accommodate the hiring of more female workers. • Contractual clauses against rape, defilement and other Gender-based Violence, as well as child and forced labour, will be inserted into the contract of the Contractor and Supervising Consultant. These will be binding on all Sub Contractors and Third-Party Suppliers under the Project • Workers on site will sign the Code of Conduct (see Appendix 6) for sample Code of Conduct) with sanctions on rape defilement, abuse and other Gender-Based Violence related acts. • Contact numbers of representative on the Grievance Redress Committee and GBV Service Providers will be pasted around the project site and within the immediate project zone. • Issues of Gender Based Violence will be discussed at the daily Toolbox meeting. • Prohibition posters on sexual exploitation and harassment will be posted on and around the site. • The Contractor will paste the contact numbers of the nearest DOVVSU/Police Station within the site and its environs. • Organize one sensitization session on GBV for site workers
Risks of HIV/AIDS and STIs spread	• Causal sex between construction workers and petty traders and neighbouring community members	• Sensitization on HIV/AIDS and other STIs will be undertaken as part of the daily toolbox meeting. • Condoms will be provided for construction workers. • A Code of Conduct will be prepared for the employees of contractors and sub-contractors' employees to inform them of the sanctions for illicit sexual affairs and stigmatization of Persons Living HIV/AIDS
Operational Phase		
Waste handling and disposal impacts	• Liquid waste	• Channelling of liquid waste generated into a centralised sewerage system
	• Domestic waste	• Segregation of domestic waste bins at vantage locations • Provision of coded waste bins

		• Sensitisation of construction workers on good housekeeping practices, such as waste segregation
	• Electronic waste	• Contracting EPA certified special waste management company to dispose of WEEE
Potential Impacts on Air Quality	• Exhaust fumes from the generator set	• Regular services of generator set
Potential Fire Risks	• Ignition sources • LPG • Faulty electrical equipment	• Post caution signs like 'No Smoking', 'Switch Engines' and 'Mobile Phones Off', 'Emergency Hotlines', etc., conspicuously in fire-sensitive areas. • Install smoke detectors and heat alarms in various offices and facilities; • Provide firefighting equipment such as fire beaters, extinguishers, foam concentrates, hose reels, dry chemical powder, and CO_2 fire extinguishers at vantage points and generator plant areas, and various offices and facilities; • Restrict cooking and smoking to designated areas • Provide fire emergency exits and assembly points • Provide hydrants at strategic locations within the premises of the facility • Conduct annual firefighting drills and search-and-rescue operations to check the efficiency of emergency response and preparedness plans.

ESMP Implementation Cost

The estimated cost for implementing this ESMP outside the works contract price is sixteen thousand, five hundred American Dollars (**UDS16,500.00**). The Ministry of Employment and Labour Relations is responsible for providing this amount to implement the ESMP.

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1.0 INTRODUCTION

1.1 Background

The Government of Ghana, through the Ministry of Finance (MoF), has received financing from the World Bank for the implementation of the Ghana Jobs and Skills Project (GJSP). The Project Development Objective is to support the Government of Ghana in skills development and job creation. The project will have national coverage and will comprise multiple activities that promote the employment and productivity of workers, as well as initiatives to strengthen the efficiency and capacity of government agencies for the various activities to be implemented under the project.

The project (GJSP) has the following four (4) components:

- Component 1 – Provision of Apprenticeship Training for Jobs;
- Component 2 – Provision of Entrepreneurship and Small and Micro Enterprise Support for Jobs;
- Component 3: Operationalisation of the Ghana LMIS, Upgradation of District Public Employment Centres and Services, and Independent Reviews of Government Youth Employment and Skills Development Program; and
- Component 4 – Capacity Development, Technical Assistance, and Project Management Support for Enhanced Skills and Jobs Impact.

The Ministry of Employment and Labour Relations (MELR) is implementing the Component 3 of GJSP. Under Subcomponent 3.2 of Component 3, the project will support the Redevelopment of the Old Labour Department Head Office, located in the Ministerial Enclave, Osu-Accra, into a four (4)-storey building modern office complex.

1.2 Project Justification

The Labour Department of the MELR enforces labour laws and regulations in Ghana. The Department provide workers' and employers employment-related services such as job-matching, job counselling and mediation; and generates reliable labour market information for employment policy and national development planning. The Labour Department Head Office in Accra was constructed in the 1960s to serve as the focal centre for coordinating the activities of the regional and district offices. Though the Public Works Department has been periodically

engaged to undertake minor maintenance and, in some circumstances, other ad hoc maintenance works, the facility has not seen any major maintenance work since its inauguration. Due to the lack of significant renovation on the Labour Department Head Office structures, the facility has developed major structural defects, which expose workers, clients and other facility users to public health and safety. Besides the structural defects, the Labour Department Head Office facilities are not accessible to people with disabilities (PWDs).

The Ministry of Employment and Labour Relations intends to redevelop the facility to befit the status of the national head office of the Labour Department. The facility, upon completion, will have an ultra-modern office complex and mixed-use facility, which blends a combination of offices, and conference rooms, with disability-friendly features. The facility will also be equipped with energy-efficient ICT infrastructure and office equipment to modernise the operations of the Labour Department.

1.3 Objectives/Purpose of the ESMP

The prime objective of this Environmental and Social Management Plan (ESMP) is to bring the project into compliance with applicable national environmental and social legal requirements and the World Bank's Environmental and Social Safeguards Policies. The ESMP also seeks to define and outline the mitigation/enhancement, monitoring, consultative and institutional strengthening measures to be undertaken during project implementation and operation to prevent, minimise, mitigate or compensate for adverse environmental and social impacts resulting from the sub-project. In addition, the ESMP seeks to enhance the project's beneficial impacts.

1.4 Methodology for the ESMP

The key methodologies for the ESMP processes involved stakeholder engagements (Appendix 1), site and specialised studies, baseline surveys, and document review, including:

- Population and Housing Census, General Report Vol 3A_Population of Regions and Districts (2021);
- Population and Housing Census, General Report Volume 3E_Economic Activity (2021);
- Medium-Term Development Plan of the Korle Klottey Municipal Assembly (2022 – 2025);

- Environmental and Social Management Framework for Ghana Jobs and Skills Project;
- Stakeholder Engagement Plan for Ghana Jobs and Skills Project;
- Ghana Jobs and Skill Project Appraisal Manual;
- World Bank's Environmental and Social Safeguards Policies; and
- World Bank Group Environmental, Health and Safety Guidelines.

The site investigations and traffic and road assessments covered the following:

- Location and land use;
- Biodiversity survey;
- Ambient air quality and noise level;
- Road network and traffic conditions;
- Socio-economic survey;
- Employment and gender-related issues; and
- Waste management.

Stakeholders involved in the ESMP process included:

- Korle Klottey Municipal Assembly;
- Ghana Fire Service;
- Ghana Police Service;
- Environmental Protection Agency;
- Ghana Water Company Limited;
- Electricity Company of Ghana;
- Accra Metro Sewage Unit;
- Labour Department;
- Ghana Revenue Authority; and
- Project Affected Persons.

1.5 Report Organisation

The ESMP Report is organised into twelve (12) main chapters, preceded by an Executive Summary, as follows:

- Chapter 1: Introduction;
- Chapter 2: Description of proposed project activities;

- Chapter 3: Relevant policies, legal and administrative frameworks;
- Chapter 4: Environmental and social baseline conditions;
- Chapter 5: Stakeholder Consultation;
- Chapter 6: Identification and Evaluation Of Environmental and Social Risks and Impacts;
- Chapter 7: Environmental and social mitigation and management plan;
- Chapter 8: Environmental and social monitoring plan;
- Chapter 9: ESMP reporting;
- Chapter 10: Grievance redress mechanisms;
- Chapter 11: Emergency preparedness plan; and
- Chapter 12: Conclusion.

2.0 DESCRIPTION OF PROPOSED PROJECT ACTIVITIES

2.1 Project Overview

The Labour Department Head Office in Accra was constructed in the 1960s to serve as the national focal centre for coordinating the activities of the district and regional Labour Department Secretariats. The facility has not seen any major maintenance work since its construction. Although minor maintenance and, in some circumstances, other ad hoc maintenance works have been undertaken by the Public Works Department of the Ministry of Works and Housing. As a result of the lack of major maintenance works, the building has developed major structural defects (Figure 2.1), such as cracked walls, broken down sewerage systems (resulting in leakages) and broken down roofing which leads to leakages during downpours. The structural defects of the facility expose workers, clients and other users of the facility to safety and public health risks. Besides the structural defects, the Labour Department Head Office facilities are not accessible to people with disabilities.

The Ministry of Employment and Labour Relations intends to redevelop the facility to befit the status of the national head office of the Labour Department. The facility, upon completion, will have an ultra-modern office complex and mixed-use facility, which blends a combination of offices, and conference rooms, with disability-friendly features. The facility will also be equipped with energy-efficient ICT infrastructure and office equipment to enhance the operations of the Labour Department.

2.2 Project Location

The project site is located (Figure 2.2) along Starlet 91 Road, opposite (northern boundary) the Accra Sports Stadium and adjacent (western boundary) to the Head Office of the Ghana Revenue Authority in the Korle Klottey Municipality. The site also shares boundaries (Figure 2.3) with the Black Star Square (eastern boundary) and the Head Office of the Ghana Water Company (southern boundary). The areas adjoining the project site are built-up locations (Figure 2.3). The site covers a total area of 0.933 acres (Appendix 2) and is about 20m above mean sea level.

Figure 2. 1 Current State of the Labour Department Head Office

Figure 2. 2 Aerial Map of Project Location

a. Western Boundary

b. Southern Boundary

c. Northern Boundary

d. Eastern Boundary

Figure 2. 3 Areas Adjioing the Project Site

2.3 Project Components and Activities

The proposed project involves the construction of a four (4) storey office building for the Labour Department Head Office (A model of the Proposed Building and architectural designs are presented in Appendix 3). The proposed project will cover a gross floor area of 2300m^2 and will have the following key facilities and features, which will be accessible to PWDs:

- Offices,
- Labour Complaint Centre,
- Conference rooms;
- Washrooms;
- Storerooms;
- Reception/Waiting Area; and
- Car Park.

The project will involve pre-construction, construction, post-construction, and occupancy phases activities described below.

2.3.1 Pre-Construction Phase Activities

The key pre-construction phase activities include the following:

- Geo-technical studies;
- Feasibility studies, including surveying, concept and general design of the project;
- Structural and architectural designs;
- General layout planning;
- Compensation and resettlement of Project Affected Persons (PAPs); and
- Relocation of Labour Department staff to a temporary office at NDK Building (located about 1km from the project site).

2.3.2 Construction Phase

The construction phase activities will last about thirteen (13) months with an estimated sixty (60) workers. The main activities will involve the following:

1. Mobilisation of construction workforce;
2. Equipment mobilisation and raw material sourcing;
3. Disconnection of utility Infrastructure;
4. Demolition and land preparation activities;
5. Erecting of structure;
6. External works; and
7. Utility provisions.

2.3.2.1 Mobilisation of the Construction Workforce

Construction activities will begin with the creation of offices and warehouses on site (for storage of machinery and equipment). The project's construction phase will involve employing about sixty (60) workers at various stages. The project contractor will hire unskilled labour from communities near the proposed sub-project site. The skilled workforce (mainly site engineers and supervisors) will be sourced from the project municipality and other parts of the Greater Accra Metropolitan Area (GAMA). Hence there will be no on-site accommodation

facilities. An indicative list of the roles/activities required for the construction and related works is provided in Table 2.1.

Table 2. 1 Indicative List of Roles Required in the Construction Phase

Role/Activity	No.	Role/Activity	No.
Project Manager	1	Labourers	20
Surveyor	1	Project Engineer	2
Construction/Concrete Supervisors	2	Form fixing / Steel fixing / Scaffolding	2
Steelworks Supervisors	2	Carpenters	2
Plumbing Supervisors	2	Masons	3
Electrical works Supervisors	2	Plumbers	2
Construction and Yard Foremen	3	Tiling/Joining	3
Joining/Tiling Foremen	2	Painting	5
Steel bending Foremen	3	Electricians	3

Table 2. 2 Equipment and Machinery

S/n	Machinery/Equipment	No.	Function
1.	Chainsaw	1	Cutting of trees
2.	Excavator (320 CL)	1	Digging and handling of materials
3.	Backhoe	2	Digging, cutting, levelling and loading
4.	Tipper Truck (20m^3)	2	Carting of aggregates
5.	Poker Vibrator	1	Compaction of concrete works
6.	CAT 140k Grader	1	For creating flat surfaces during levelling of the land
7.	Sheep foot Roller CAT CS74	1	For compacting levelled surfaces
8.	Water Bowser	1	Water conveying
9.	Mobile Concrete Mixers	2	Mixing of concrete
10.	Dumpers	2	Transportation of concrete
11.	Crane	1	Lifting heavy objects

2.3.2.2 Equipment Mobilisation and Raw Material Sourcing

All Construction facilities, turnover materials, and engineering equipment, including bulldozers, and excavators, will be rented within GAMA. An indicative list of the equipment/machinery to be used is provided above in Table 2.2.

2.3.2.3 Disconnection of Utility Infrastructure

This will involve the disconnection or disengagement of the following public utility infrastructure from the existing structure:

- Electricity power supply;
- Potable water supply; and
- Sewerage network connections.

2.3.2.4 Land Preparation and Demolition Activities

Land preparatory activities will involve demolishing existing structures, excavating for foundation works, regrading and levelling the site. The demolishing activities will be preceded by the manual removal of about 180 pieces of asbestos roofing sheets. Approximately 400m^3 of demolition spoil will be generated from demolition works. Land preparatory activities will cover about one (1) month. The initial layout of the drainage network will also be created. About 800m^3 of excavated spoil will be generated from excavation activities.

2.3.2.5 Construction of the Super Structure and Ancillary Works

Construction activities will involve the following:

- Civil works for the foundation, substructure and superstructure;
- Civil works for the utility infrastructure facilities;
- Installation works involving the electrical fittings, plumbing works, windows, doors, flooring and landscaping of the exterior facade and surroundings; and
- Painting of the structure and other exterior and interior decorations.

2.3.2.6 External Works

The external works will involve the construction of the following auxiliary facilities:

- Drainage works;
- Car park (50 capacity); and
- Landscaping.

2.3.2.7 Utility Provisions

Water Supply

Water supply to the project site will be sourced from Ghana Water Company Limited. Water storage tanks will be installed to serve as reservoirs. During the occupancy phase, an estimated two hundred (200) people will use the facility weekly. The anticipated water demand for the facility will be in the range of 5000 litres per day. Rainwater would be harvested for non-potable purposes such as landscaping, sanitary purposes and firefighting.

Electricity Supply

A Grid Tied Solar System. (GTSS) will generate the primary source of electricity supply to the facility throughout the day during the occupancy phase. GTSS are solar power setups connected to the electricity grid and work without any battery backup equipment. The system exports the excess power generated from the solar panels to the larger utility grid instead of storing it in a battery. During the evenings, the facility will switch entirely on the national

electricity to be sourced from the Electricity Company of Ghana. To ensure an uninterrupted electrical power supply, the facility will have a 400kv generator set; a prime three-phase four-wire diesel generator installed to serve as an alternative power source. Light Emitting Diode (LED) bulbs will be used in the building to minimise heating and conserve energy. The facility will be designed to harvest daylight to reduce reliance on electricity for illumination.

Liquid Waste Treatment

Liquid waste from washrooms and other sanitary areas will be channelled through PVC pipes to a centralised sewerage network managed by the Accra Metro-Sewage Unit.

2.4 Project Decommissioning Phase Activities

The continued presence of any work camp, containers for storing materials, including equipment/machinery, fuel/lubricant, and temporary structures on the site after construction will reduce the facility's aesthetic value. Therefore, these structures would be decommissioned.

The decommissioning activities will involve the following:

- Dismantling and evacuation of temporary structures and storage facilities;
- Evacuation of waste of the site; and
- Evacuation of heavy-duty machinery/equipment off the project site.

2.5 Post - Construction Works

This would involve the commissioning of the project. The structure's functionality, utility facilities, internal washrooms and other auxiliary facilities will be evaluated.

2.6 Occupancy Phase Activities

The management activities during the occupancy phase will include:

- Waste management provision;
- Fire control system;
- Rainwater harvesting system; and
- General maintenance of the facility.

2.6.1 Waste Management Provision

Domestic waste will be segregated into organic, plastic, glass, paper, cardboard, and general waste. Colour-coded bins will be provided at vantage points around facilities at the office complex for workers and patrons for waste segregation. Liquid waste in the form of faecal matter and urine will be channelled into the centralised sewerage system.

2.6.2 Fire Control System

The entire facility will be fitted with a firefighting system. All high-risk areas, such as the generator plant and fuel storage area, will be equipped with horse wheels. Other areas, such as offices, conference centres, restaurants, etc., will have early warning fire alarm systems and fire extinguishers of various kinds posited at vantage points. The staff of the Labour Department will be trained and equipped with firefighting skills that will be periodically tested by conducting fire drills. A fire assembly point will be designated at a vantage point.

2.6.3 Rainwater Harvesting System

Rain gutters will be fitted on the facility's roof to harvest rainwater. About 10,000m^3 of rainwater would be harvested yearly. The rainwater harvested will be channelled into underground storage tanks and used for non-potable uses, such as landscaping, firefighting and flushing of toilet in water closets.

2.6.4 General Maintenance of Facility

There will be regular maintenance of all infrastructure. Well-trained personnel will be in charge of housekeeping of the facility daily. Landscaping activities will be done weekly to ensure facilities are always presentable. Electronic and electrical appliances, such as air conditioners, computers, and fans, will be changed every five (5) years.

3.0 POLICY, LEGAL AND INSTITUTIONAL FRAMEWORK

The relevant policy and regulatory framework to the construction sector and specifically to the proposed Redevelopment of the Labour Department Head Office have been reviewed in relation to National and World Bank requirements. The requirements, as reviewed and applied in the ESMP process, have been grouped under six (6) broad themes as follows:

- National environmental policy and related requirements;
- National environmental quality standards;
- Framework for national planning and development;
- National labour, safety, and health requirements;
- World Bank requirements;
- Difference between Ghana and the World Bank's EA requirements; and
- Relevant institutions.

3.1 National Environmental Policy and Related Requirements

The relevant National Environmental Policy and Related Requirements reviewed include:

1. Ghana's Environmental Policy (2013);
2. Environmental Protection Agency Act, 1994(Act 490);
3. Environmental Assessment Regulations 1999 (LI 1652);
4. Fees and Charges (Amendment) Instrument, 2019 (LI 2386); and
5. Ghana National Climate Change Policy, 2013; and
6. Hazardous and Electronic Waste Control and Management Act, 2016 (Act 917).

3.1.1 Ghana's Environmental Policy, 2013

The Ghana National Environmental Policy was formulated in 1995 and revised in 2013. The ultimate aim of the Policy is to improve the surroundings, living conditions and the quality of life of the citizenry, both present and future. This policy sets the framework for environmental management in Ghana and seeks to promote sustainable development by ensuring a balance between economic growth and natural resource conservation. The policy thus makes a high-quality environment a key element supporting the country's economic and social development.

3.1.2 Environmental Protection Agency Act, 1994(Act 490)

The Environmental Protection Agency (EPA) is vested with the power to ensure compliance with the procedures and regulations of the Environmental Protection Agency Act 1994 (Act 490). The Act mandates the Agency to ensure compliance with the Ghana EIA procedures, and it is the parent law to the Environmental Assessment Regulations, 1999 (LI 1652). The Agency is also required to control and monitor the generation and disposal of waste.

The Agency, accordingly, has the mandate to require EIAs for 'undertakings' and serve as an Enforcement Notice for any offending or non-complying undertaking. MELR, in compliance with the EIA procedures, has held engagement sessions with the EPA on the proposed project, with the Agency providing the necessary guidance on the process to ensure a credible ESMP.

3.1.3 Environmental Assessment Regulations, 1999 (LI 1652)

The Environmental Assessment Regulations, 1999 (LI 1652) require that proposed undertakings are registered with EPA and an environmental permit secured before commencing the undertaking. The LI groups undertakings into schedules to facilitate screening. Schedule 1 undertakings require registration (by filling out the Registration Form EA1) as the basis for consideration for an environmental permit. The Schedule 2 undertakings are the EIA mandatory undertakings, which are considered to have potentially significant impacts and therefore require detailed assessment.

The LI 1652 also requires an Environmental Management Plan (EMP) and Annual Environmental Report (AER) for projects approved for implementation. The provisional EMP in this report will be converted to construction phase EMP before implementation. AER will be prepared accordingly for submission to EPA, as required by the schedule of permit conditions. Form EA 1 was duly completed and submitted for the project.

The process outlined in the LI 1652 was duly followed, including engaging EPA and all other relevant stakeholders towards preparing the ESMP report. The ESMP also has a Provisional EMP chapter, which incorporates a monitoring plan that will enable follow-up on mitigation measures and other safeguards commitments and management stewardship during implementation.

3.1.4 Fees and Charges (Miscellaneous Provisions) Act, 2022 (Act 1080)

The Fees and Charges (Miscellaneous Provisions) Act, 2022 (Act 1080) sets out the fee regime for processing and environmental permits associated with the Environmental Assessment Regulations 1999 (LI 1652). MELR will be required to pay processing and permit fees for the EPA issuance of the Environmental Permit.

3.1.5 Ghana National Climate Change Policy, 2013

The National Climate Change Policy (NCCP) is an integrated response to climate change concerns in Ghana. The policy aims to ensure a climate-resilient and climate-compatible economy while pursuing a sustainable development agenda through equitable low-carbon economic growth.

The policy areas have been divided into programme areas. This is meant to improve food security, increase the resilience of infrastructure and communities, improve environmental management practices and ecosystems for greater biodiversity and carbon sequestration, optimise key socio-economic factors, and achieve more efficient systems for improved economic growth. The project will rely extensively on solar energy during the occupancy phase to reduce the reliance on the national grid (which has a greater thermal generation mix). The project has been designed to harvest daylight to reduce reliance on electricity for illumination.

3.1.6 Hazardous and Electronic Waste Control and Management Act, 2016 (Act 917)

The Hazardous and Electronic Waste Control and Management Act, 2016 (Act 917) provides control, management, and disposal of electrical and electronic waste. It also provides a list of hazardous and other waste. Hazardous waste generally refers to waste with properties that make it potentially dangerous or harmful to human health and the environment. They include liquids, solids, or gases, which cannot be treated or disposed of through commonly used methods. The Act will also ensure that harmful elements associated with hazardous and other waste products are captured and processed safely to preserve critical ecological components such as the soil, groundwater, flora, and fauna. Rehabilitation works and connection of households to the sewerage network will involve using hazardous substances. The project contractor and the management of MELR will ensure that proper disposal of the asbestos waste, electronic waste and other hazardous substances to be generated during the construction and occupancy phases are in accordance to the provisions of the Act.

3.2 National Environmental Quality Standards

The reviewed national environmental quality standards applicable to the project – noise and dust, and other emissions included:

- Ghana Standards for Health Protection – Requirements for Ambient Noise Control (GS 1222: 2018); and
- Ghana Standards for Environment and Health Protection – Requirements for Ambient Air Quality and Point Source/Stack Emissions (GS 1236: 2019).

3.2.1 Ghana Standards for Health Protection – Requirements for Ambient Noise Control (GS 1222, 2018)

The Ambient Noise Controls provide maximum permissible noise levels based on categorised zones (Table 3.1). The standard also provides noise requirement for a construction site which includes:

- Erecting an acoustic barrier around the construction site; and
- Ensuring that the maximum noise level near the construction site does not exceed 66dB(A) Leq (5min) in areas other than industrial areas.

Measures such as turning off all idle machinery and vehicles will be put in place to ensure that noise generated on the project site does not exceed the permissible limits.

Table 3. 1 Requirement for Ambient Noise Control

Zone	**Permissible Noise Level in dB(A)**	
	Day (6:00am-10:00pm)	**Night (10:00pm-6:00am)**
Residential Area	55	48
Educational, health facilities, offices, and law courts	55	50
Mixed used	60	55
Area with some light industry	65	60
Commercial Areas	75	65
Light Industry Areas	70	60
Heavy Industry Areas	70	70

Source: Ghana Standards Authority, 2019

3.2.2 Ghana Standards – Requirements for Ambient Air Quality and Emissions (GS 1236: 2019)

The Ghana Standard for Environment and Health Protection - Requirements for Ambient Air Quality and Point Source/Stack Emissions provides the maximum limit for ambient air pollutants (Table 3.2).

Table 3. 2 Requirements for Ambient Air Quality – Maximum Limit for 24 Hours

Substance	Maximum Limit (µg/m^3)
Sulphur Dioxide (SO_2)	50
Nitrogen Oxide (NO_2)	250
Total suspended particulate matter	150
PM_{10}	70
$PM_{2.5}$	35

Source: Ghana Standards Authority, 2019

Relevant ambient air quality and noise baseline monitoring was conducted and compiled for the assessment, and the GPS coordinates of the sampling sites were taken as the reference location for future monitoring purposes.

3.3 Framework for National Planning and Development

The review covered the following areas:

1. Land Use and Spatial Planning Act, 2016 (925);
2. Local Governance Act 2016 (Act 936);
3. Ghana Building Code (GhBC GS 1207: 2018);
4. Persons with Disability Act, 2006, (Act 715);
5. National Gender Policy, 2015; and
6. Renewable Energy Act, 2011 (Act 832).

3.3.1 Land Use and Spatial Planning Act, 2016 (925)

The Land Use and Spatial Planning Law seeks to provide sustainable development of land and human settlements through a decentralised planning system and ensures judicious use of land. This is to improve the quality of life, promote health and safety in respect of human settlements. It further regulates national, regional, district and local spatial planning and generally provides for spatial aspects of socio-economic development and related matters. The Act gives a more precise direction to ensure Ghanaian society's compliance and enforcement of spatial development regulations. It seeks to also contribute to a more sustainable and well-functioning

land administration system that is fair, efficient, cost-effective and decentralised and will enhance land tenure security in the country. The Physical Planning Unit of the Korle Klottey Municipal Assembly will be involved in the planning, permitting and supervision during the project implementation.

3.3.2 Local Governance Act, 2016

In accordance with the Act, the Ministry of Local Government and Rural Development is responsible for the sixteen administrative regions of Ghana. These regions are subdivided into 254 Metropolitan, Municipal and District Assemblies (MMDAs). The Act mandates the MMDAs to take charge of the overall development of their respective areas, making them representatives of the central Government at the local level. The MMDAs are responsible for the physical/spatial planning of their areas, approval of all planning schemes in the districts, and development control through the grant of permits for development. The MMDAs are responsible for waste management and general sanitation enhancements compliance in their jurisdiction.

3.3.3 Ghana Building Code (GhBC GS 1207: 2018)

The Ghana Building Code sets out the requirements, recommendations, planning, management and practices that will lead to the smooth operation and construction of residential and non-residential buildings in the country. The proposed project will be designed according to the specification of the Ghana Building Code.

3.3.4 Persons with Disability Act, 2006 (Act 715)

The Persons with Disability Act, 2006 (Act 715) stipulates that the owner or occupier of a place to which the public has access shall provide appropriate facilities that make the place accessible to and available for use by a person with a disability. The Act also states that a person who provides service to the public shall put in place the necessary facilities that make the service available and accessible to a person with a disability. The project will incorporate disability-friendly facilities, such as ramps and elevators, to make the facility accessible to people with disabilities.

3.3.5 National Gender Policy, 2015

The policy's overarching goal is to mainstream gender equality concerns into the national development processes by improving the social, legal, civic, political, economic, and socio-

cultural conditions of the people of Ghana, particularly women, girls, children, the vulnerable and people with special needs, persons with disability and the marginalised. The project will allocate a quota for females during the construction phase recruitment processes.

3.3.5 Renewable Energy Act, 2011 (Act 832)

The Act seeks to create favourable regulatory and fiscal regimes and attractive pricing incentives for developing and using its renewable energy resources. Its provisions support the country's development, utilisation, and efficient management of renewable energy sources. It also provides for the utilisation, sustainability, and adequate supply of renewable energy for electricity and heat generation. The project, upon completion, will rely extensively on solar energy to meet its daytime electricity consumption need.

3.4 National Labour, Safety and Health Requirements

The requirements and provisions for the protection of workers, the promotion of health and safety, and the general well-being of the project workforce and the public in relation to the project implementation, which was reviewed, included:

1. Factories, Offices and Shops Act, 1970 (Act 328);
2. Draft Occupational Safety and Health Policy of Ghana (Draft, 2004);
3. Labour Act, 2003 (Act 651);
4. Children's Act 2016 (Act 937);
5. Workmen's Compensation Law;
6. National Health Policy, 2020;
7. Imposition Restriction Act, 2020 (Act 490);
8. Road Traffic Act, 2008 (Act 761);
9. Ghana National Fire Service Act, 1997 (Act 537);
10. Fire Precaution (Premises)(Amendments) Regulations 2016 (LI 2249);
11. National HIV and AIDS Policy; and
12. National Workplace HIV/AIDS Policy.

3.4.1 Factories, Offices and Shops Act 1970 (Act 328)

The Factories, Offices and Shops Act, 1970 (Act 328) spells out the responsibilities of an employer in ensuring a safe and healthy work environment for employees. It defines a factory to include any premises (whether or not in a building) in which one or more persons are employed in manual labour in any process.

The Act mandates the Factories Inspectorate Department (FID) to register such activities and ensure that internationally accepted standards of providing safety, health and welfare of persons are adhered to. The Act also requires work-related accidents that result in death or disability (for more than three (3) days) to be reported to the Chief Inspector, whether on or off-premises. The project contractor must register with the Factories Inspectorate Department of the Ministry of Employment and Labour and follow all the statutory guidelines.

3.4.2 Draft Occupational Safety and Health Policy of Ghana

The statement of the Occupational Safety and Health Policy of Ghana (Draft, 2004) is: 'to prevent accidents and injuries arising out of or linked with or occurring in the course of work, by minimising as far as reasonably practicable the cause of the hazards in the working environment and, therefore the risk to which employees and the public may be exposed'. The policy is derived from provisions of the International Labour Organisation (ILO) Conventions 155 and 161. The policy highlights specific strategies and awareness creation which ensure that workers engaged are protected.

The ESMP identified and assessed potential sources of accidents and injuries that could occur in the course of work and incorporated safeguards to prevent or minimise safety risks and health hazards in the work environment for employees and the public, as required by the draft OSH Policy.

3.4.3 Labour Act, 2003 (Act 651)

The purpose of the Labour Act, 2003 (Act 651) is to amend and consolidate existing laws relating to labour, employers, trade unions and industrial relations. The Act provides for the rights and duties of employers and workers; guarantees trade unions and freedom of associations and establishes the Labour Commission to mediate and act in respect of all labour issues. The provisions under Part XV (Occupational Health, Safety and Environment), of the Act, explicitly prescribe the duty of an employer to ensure that every worker works under satisfactory, safe, and healthy conditions and is relied on extensively to cater for workers at both construction and operation phase of the project.

3.4.4 Children's Act 2016 (Act 937)

The Children's Act 2016 (Act 937) seeks to reform and consolidate the law relating to children, provide for the child's rights, maintenance, and adoption, regulate child labour and

apprenticeship for ancillary matters concerning children generally, and to provide for related matters. Section 87 of this Act states, "No person shall subject a child to exploitative labour". Therefore, no project activities shall engage children below the legal working age (18 years for hazardous work). Provisions against exploiting child labour have been included in the ESMP.

3.4.5 Workmen's Compensation Law

The law holds employers responsible for the payment of compensation to workmen for personal injuries caused by accidents arising out and in the course of their employment. Where an employee sustains a personal injury by accident arising out of and in the course of employment, the employer is liable, subject to this Act, to pay compensation in accordance with this Act.

Provision has been made in the ESMP for all contractor employees to comply with the Workmen's Compensation Law by taking the required insurance for its workers.

3.4.6 National Health Policy 2008

The National Health Policy serves as the basis for developing health sector priorities and planning. It aims at creating wealth through health, among other things. It emphasises improvements in personal hygiene, immunisation of mothers and children, the practice of safe sex and the prevention of injuries at both workplaces and on the road. Ghana's health policy is hinged on the vision of 'creating wealth through health'. It comprises three inter-related and mutually reinforcing objectives:

- To ensure that people live long, healthy and productive lives and reproduce without an increased risk of injury or death;
- To reduce the excessive risk and burden of morbidity, mortality and disability, especially among poor and marginalised groups; and
- To reduce the inequalities in access to health, reproduction and nutrition services and health outcomes.

The necessary safety enhancement measures, such as the provision of PPE, will be put in place to protect construction workers from injuries.

3.4.7 Road Traffic Act 2008 (Act 761)

The Road Traffic Act, 2008 (Act 761) provides comprehensive regulation of traffic and road use to ensure safety and related matters on our roads. It offers methods and measures to prevent road users from being killed or seriously injured. Typical road users include pedestrians, cyclists, motorists, vehicle passengers, horse riders, and passengers of on-road public transport.

The ESMP has incorporated measures in line with this Act (and conducted a traffic Impact Assessment) to regulate traffic and improve the access routes to ensure the safety of road users and the general public along the haulage routes.

3.4.8 Ghana National Fire Service Act, 1997 (Act 537)

The Ghana National Fire Service (GNFS) Act, 1997 (Act 537) re-establishes the Fire Service to manage undesired fires and make provisions for related matters. To achieve its objective, the Service organises public fire education programmes and provides technical advice for building plans and structural layouts to facilitate escape from fire, rescue operations and fire management. The Ministries GNFS Division has been engaged as part of the ESMP consultation process.

3.4.9 Fire Precaution (Premises)(Amendments) Regulations 2016 (LI 2249)

The Fire Precaution (Premises) (Amendment) Regulations, 2016 (LI 2249), requires a fire certificate for premises used as a public place or place of work. It is incumbent on any project developer to ensure that adequate provisions and measures are introduced to minimise or prevent fire outbreaks.

Fire prevention and control measures and the requirements of GNFS have been incorporated into the ESMP.

3.4.10 National HIV and AIDS Policy, 2019

The National HIV and AIDS Policy 2019 provides the overarching perspective, position and direction of Ghana as it continues on its journey to reach the 90-90-90 fast track targets by 2020 and, ultimately, the SDG 3 specific target 3.3, which calls for an end to the epidemic of AIDS by 2030. The four objectives of the policy are to:

- Empower the population to prevent new HIV infections;

- Ensure the availability of and accessibility to prevention, treatment, care and support services;
- Mitigate the social and economic effect of HIV on persons infected and or affected by HIV; and
- Ensure the availability of adequate funding to execute the policy strategies.

3.4.11 National Workplace HIV/AIDS Policy

The broad objectives of the National Workplace HIV/AIDS Policy, among others, are to provide protection from discrimination in the workplace to people living with HIV and AIDS; prevent HIV and AIDS spread among workers; and provide care, support and counselling for those infected and affected. The proposed project will receive substantial local community involvement. The number of migrant workers in a beneficiary community is expected to be very low. Therefore, the potential risk of HIV exposure and transmission from migrant workers in the communities is low. Despite the low risk, workplace HIV policy has been provided in the ESMP, consistent with the requirements of the national policy.

3.5 World Bank Requirements

The proposed project will trigger the following World Bank Operational Policies:

- Environmental Assessment Policy OP4.01;
- Involuntary Resettlement Policy OP4.12; and
- WBG General Environmental Health and Safety Guidelines.

3.5.1 Environmental Assessment Policy OP4.01

This policy ensures that projects proposed for World Bank financing have undergone environmental assessment and are environmentally feasible and viable and that decision-making is improved through the appropriate analysis of actions and their probable environmental impacts. This policy is triggered if the project is likely to cause potential (negative) environmental risks and impacts in its area of influence. The OP 4.01 takes into account the following, among others:

- Impacts on the physical environment (air, water and land);
- Life environment, health and safety of populations; and
- Cultural and physical resources.

The Bank undertakes environmental screening to determine the appropriate extent and type of environmental assessment to be conducted; classifies the proposed projects into categories depending on the type, location, project sensitivity, scale of the projects, and the nature and magnitude of their potential environmental impacts.

This project falls under Category B. Projects considered as Category B have potentially adverse environmental impacts on human populations or environmentally important areas that are site-specific. In most cases, mitigatory measures can be designed more readily.

3.5.2 Involuntary Resettlement Policy OP4.12

The main objectives of the Resettlement Policy are:

- Avoid or minimise involuntary resettlement whenever feasible;
- Develop resettlement activities as sustainable development programs, providing sufficient investment resources to enable the displaced persons to share in project benefits;
- Meaningfully consult displaced persons and give them opportunities to participate in planning and implementing resettlement programme;
- Assist displaced persons in their efforts to improve their livelihoods and living standards or at least restore them, or to pre-displacement levels or levels prevailing prior to the beginning of project implementation, whichever is higher.

The project implementation will result in a temporary economic displacement of petty traders close to the project site. The identified impacts on livelihoods and the likely resettlement or compensation will be fully addressed in an Abbreviated Resettlement Action Plan (ARAP) to be prepared and implemented in connection with the project.

3.5.3 WBG General Environmental Health and Safety Guidelines

The World Bank Group (WBG) General Environmental Health and Safety (EHS) Guidelines is a technical reference document containing information on cross-cutting environmental, health and safety issues potentially applicable to all industry sectors. The General EHS guidelines, which prescribe performance levels and measures, are designed to be used together with the relevant Industry Sector EHS Guidelines. The General Guidelines are in 4 main groups: Environmental; Occupational Health and Safety; Community Health and Safety; and Construction and Decommissioning.

3.6 Difference between Ghana and the World Bank's EA Requirements

The broad areas of differences addressed in Table 3.3 include the following:

- Impact category;
- Social assessment;
- Stakeholder consultation; and
- Minimisation of displacement.

Table 3. 3 Key Differences in Ghana and World Bank EA Requirements

Topic	National Requirements	WB OP 4.12 Policy	Gaps	Strategies in ESMP
Impact Category	LI 1652 groups undertakings into Schedules 1, 2 and 5-related siting to facilitate screening into No EA required beyond Screening, PEA or EIA	**OP 4.01** classifies proposed projects into four categories: • Category A: project likely to have significant adverse environmental impacts that are sensitive, diverse, or unprecedented and may affect a broader area - requires ESIA • Category B: potential adverse impacts are less adverse than Category A projects. Impacts are site-specific - require ESMP. • Category C: project likely to have minimal or no adverse environmental impacts. Beyond screening, no further EA action is required. • Category FI: if the proposed project involves an investment of Bank funds through a financial intermediary in sub-projects that may result in adverse environmental impacts.	The World Bank uses more detailed criteria of assessment categories for screening decision-making than Ghana legislation, but Ghana's is more precise, where the Schedules specify the projects.	Decision on the level of assessment was based on the type, location, sensitivity, scale of the project and the nature of its potential environmental impacts. Based on the outcome of the E&S Screening, the project requires the preparation of ESMP/PEA.
Social Assessment	Legislation has general guidelines	Assessment incorporates detailed social provision,	Ghana has no explicit provision.	Social aspects are incorporated into the

	for carrying out ESIA but has no specific detailed provision for carrying out social impact assessments.	especially involving involuntary resettlement, indigenous peoples, and physical and cultural resources.	Therefore, the WB requirements on social aspects should be adopted.	ESMP, but a separate ARAP will be carried out to meet WB criteria.
Stakeholder Consultation	Section 17(1) of LI 1652 mandates EPA to hold Public Hearing, especially where impacts extensive or involve dislocation, relocation and resettlement of communities, in addition to the normal stakeholder consultations	Affected/displaced persons should be meaningfully consulted throughout the assessment, and the stakeholder engagement plan should be prepared and followed.	The WB provision appears more structured and systematic	Developed and used a stakeholder engagement Plan for this ESMP. The RAP will follow detailed stages of: (i) planning (ii) implementation and (iii) monitoring and evaluation. Also, develop a comprehensive grievance mechanism.
Minimization of Displacement	Section 5(1) of LI 1652 requires an applicant to show a clear commitment to avoid any adverse environmental effects which can be avoided.	Requires avoidance of resettlement where possible and where impossible, minimized to the extent possible.	The LI is open to minimizing resettlement, while the WB's is more explicit.	Attention was paid to minimizing displacement.

3.7 Relevant Institutions

The institutions whose involvement was relevant to the project approval and implementation include:

1. Ministry of Finance;
2. Ministry of Employment and Labour Relations;
3. Ministry of Local Government and Rural Development;
4. Environmental Protection Agency.

3.7.1 Ministry of Finance

The Ministry of Finance must manage government financial assets, propose economic and financial policy, and coordinate and supervise these actions as empowered by law. Its main duties and functions are to: Prepare the annual fiscal budget and issue adequate regulations for its execution. The Project Coordinating Unit of the Ministry of Finance is coordinating the

GJSP. There is an Environmental and Social Safeguards Specialist at the GJSP PCU at MoH who coordinates the project's Environmental and Social Safeguards implementation activities.

3.7.2 Ministry of Employment and Labour Relations

The Ministry of Employment and Labour Relations (MELR) is mandated to formulate policies on Labour and Employment issues, develop sector plans, coordinate Employment and Labour related interventions across sectors, promote harmonious labour relations and workplace safety, and monitor & evaluate policies, programmes/ projects for accelerated employment creation for national development. The Component 3 of GJSP is being implemented by the Project Implementation Unit (PIU) of the MELR. There is an Environmental and Social Safeguards Specialist at the MELR PIU who ensures that the activities under the component meet the applicable national and World Bank Environmental and Social Safeguards requirements.

The Labour Department is a technical department under MELR. The Department is mandated to facilitate employment intermediation by linking jobseekers to direct jobs or promoting their employability to become fit in the labour market. The Department is also responsible for enforcing provisions of the Labour Act 2003 (Act 651).

3.7.3 Ministry of Local Government and Rural Development

The Ministry of Local Government and Rural Development is the supervisory ministry of the respective MMDAs in the country. The Local Governance Act, 2016 (Act 936) mandates the MMDAs to ensure proper waste and sanitation management in their respective jurisdictions through their Waste Management Departments (WMDs) and their Environmental Health and Sanitation Departments (EHSD). The Town and Country Planning Departments of the respective MMDAs are in charge of overall planning and development control within their jurisdiction. Among its core functions is to coordinate the diverse/various types of uses and development of land undertaken by various departments and agencies of government as well as private developers. The power to permit a development is vested in the relevant local government authority by virtue of the Local Governance Act, 2016 (Act 936). The Physical Planning Department of the Korle Klottey Municipal Assembly will issue Development Permit for the project implementation after all the necessary statutory requirements have been met.

3.7.4 Environmental Protection Agency

The Environmental Protection Agency (EPA) is a statutory agency mandated to deal with environmental protection and regulation of environmental issues and their related purposes. The EPA is mandated to decide on project screening, guide the conduct of EAs (including this ESMP) and grant environmental approval for projects to commence. Its mandate also covers monitoring project construction and operation phases to ensure compliance with approval conditions, mitigation measures, and other environmental commitments and quality standards. The EPA has an Environmental Assessment and Audit Department that can handle its mandate.

4.0 ENVIRONMENTAL AND SOCIAL BASELINE CONDITIONS

4.1 Introduction

The environmental and social baseline information covers the project site, municipality, and Greater Accra Region.

4.2 Baseline Study Methodology

The baseline information was obtained mainly from a literature review and consultations with stakeholders. The information obtained was complemented with field surveys/environmental media monitoring, including ambient air quality noise monitoring. A Traffic Impact Assessment (TIA) and road network surveys were conducted along the access routes to the project site.

The Literature review examined various sources, including:

- Population and Housing Census, General Report Vol 3A_Population of Regions and Districts (2021);
- Population and Housing Census, General Report Volume 3E_Economic Activity (2021);
- Medium-Term Development Plan of the Korle Klottey Municipal Assembly (2022 – 2025);
- Environmental and Social Management Framework for Ghana Jobs and Skills Project
- Stakeholder Engagement Plan for Ghana Jobs and Skills Project;
- Ghana Jobs and Skill Project Appraisal Manual;
- World Bank's Environmental and Social Safeguards Policies; and
- World Bank Group Environmental, Health and Safety Guidelines.

4.3 Physical Environment

4.3.1 Geographic Location

The Korle Klottey Municipality is located between Latitudes 5°32''50' N and Longitudes 0°11''15' W and Latitudes 5°38''0' N and Longitudes 0°7''50' W. The Municipality is bounded by the La Dade-Kotopon Municipal Assembly to the East, Ayawaso East Municipality and Ayawaso Central Municipality to the North, and Accra Metropolis to the North –West and West and the Gulf of Guinea to the South. The Municipality has a total land area of 12 sq. km

(about 0.37% of the total land size of the Greater Accra Region). The proposed project site is located on latitude 5.5515548N, and longitude -0.1959670W in the southwestern part of the Korle Klottey Municipality (Figure 4.1).

4.3.2 Climatic Conditions

The project municipality lies in the dry equatorial climatic zone. It experiences two rainy seasons. The first begins in May and ends in mid-July, while the second season begins in mid-August and ends in October. It has an average annual rainfall of about 730mm, which is the lowest in the country. There is very little variation in temperature throughout the year. The mean monthly temperature ranges from 24.7°C in August (the coolest) to 33°C in March (the hottest), with an annual average of 26.8°C (Damte *et al*., 2023). As the area is close to the equator, the daylight hours are practically uniform throughout the year. Relative humidity is generally high, varying from 65% in the mid-afternoon to 95% at night. The wind direction is predominantly WSW to WNW. Wind speed in the project area is generally between 8 to 16 km/h, with a maximum wind speed of about 107.4 km/h or 58 knot.

4.3.3 Topography

The Accra (coastal) plains are almost flat and descend gradually to the gulf from about 150m. The relief is generally gentle and undulating, a low plain with heights not exceeding 60 m (200 ft.) above sea level. The attribute of the topography is marked with a succession of ridges and valleys which are spoon-shaped in nature. The coastal plain, which encompasses the GAR, is broad in the east and west, stretching over 80 km inland and narrows inland, extending no more than 16 km from the sea. The coastal plain may be divided into two broad sections: the south-east coastal plains east of Accra and the plains west of Accra (Timpong *et al*., 2014). Along the West of Accra, the plains display different characteristics. The land is not flat but undulating. The rock types found here are granites which also result in the formation of hills. Along the coastline, there is the formation of a series of small bays and headlands. The project area has an elevation of about 20m above sea level.

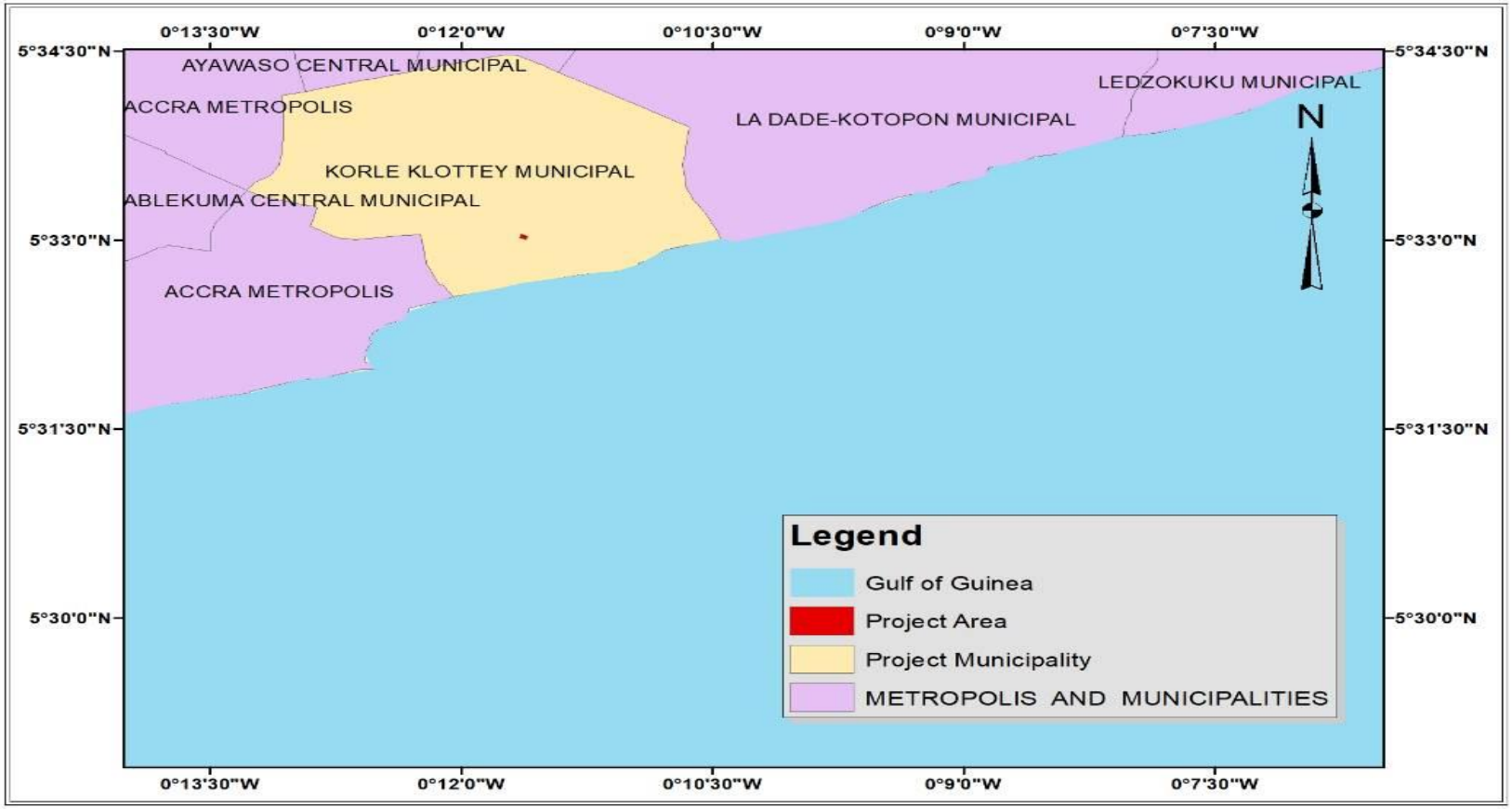

Figure 4. 1 Map of the Project District Showing the Adjoining Districts
Source: Ministry of Finance, 2023

4.3.4 Geology and Soil

The geology of the project municipality consists of Precambrian Dahomeyan Schists, Granodiorites, Granites Gneiss and Amphibolites to late Precambrian Togo Series comprising mainly Quartzite, Phillites, Phylitones and Quartz Breccias. Other formations found are the Palaeozoic Accraian Sediments - Sandstone, Shales and Interbedded Sandstone-Shale with Gypsum Lenses. The coastline of the Metropolis has a series of resistant rock outcrops, platforms, and sandy beaches near the mouth of the lagoons. The coastline is exposed and because of the close proximity of the continental shelf, a strong coastal and wind action, it is subject to severe erosion. The soils in the Metropolitan area can be divided into four main groups: drift materials resulting from deposits by windblown erosion; alluvial and marine motted clays of comparatively recent origin derived from underlying shales; residual clays and gravels derived from weathered quartzites, gneiss and schist rocks, and lateritic sandy clay soils derived from weathered Accraian sandstone bedrock formations. In many low lying, poorly drained areas, pockets of alluvial 'black cotton' soils are found. (Source MTDP of KOKMA, 2022).

4.3.5 Seismic Risk Assessment

Southern Ghana has been historically highly affected by earthquakes (for instance, in 1862, 1906 and 1939). The effect of an earthquake at any locality is dependent primarily upon its proximity to the epicentre, the local geology and a lesser extent, the local topography.

The epicentre of the June 1939 earthquake was calculated to be at approximate lat. 5^{o} 1Ĺ N, long. 0^{o} 8 W or about 25 miles south of Accra. This area lies immediately above the steep slope at the edge of the continental shelf bordering a deep submarine trough which runs parallel to the coast between Cape Palmas (Liberia) and Prampram near Tema. Steep-sided oceanic deeps of this nature are generally unstable and, therefore, a potential source of earthquakes. Although the greatest danger lies between Cape Coast and Accra, where the slope is steepest, the whole coastline lies close to a belt of possible seismic activity.

Although it was largely undeveloped at the time of the post-seismic damage surveys carried out by the Gold Coast (Ghana) Geological Survey after the 1939 seismic event placed the project zone within isoseismal VII derived from the earthquake, compared with the maximum shock intensity of IX experienced in the Weija area indicating that the project site is considered

to be located within a low to medium damage potential area. Therefore, sophisticated seismic design criteria will not be required. In the past five years (2018 – 2023), the city of Accra and its environs have recorded four (4) earth tremors (Table 4.1)

Table 4. 1 Earth Tremors Incidents in GAMA

S/n	Date/Year	Magnitude on the Richter Scale	Epicentre
1.	9 December 2018	2.6	Weija and Gbawe
2.	13 January 2019	2.6	Accra
3.	24 June 2020	4.2	Accra
4.	12 December 2022	4.0	10 km from Gbawe

Source: Ghana Geological Survey Authority, 2023

4.3.6 Ambient Air Quality

The ESMP study set out to establish the ambient baseline measurements at the project area to enable effective monitoring and management once the project commences. The air samples were taken at two locations (Table 4.2) within the project site. The results represent the environmental conditions of the proposed project area at the time (February 24 – 25, 2023) of the monitoring. The applicable Ghana Guideline (GS 1236:2019) for ambient air quality are also provided to put the results in perspective.

Table 4. 2 Summary of Air Quality Sampling Locations

Location	Location Description	GPS Coordinates	
		North	West
AQL1– West	Baseline Air Quality monitoring was conducted at the western side of the project site adjacent to the GRA main entrance.	5˚33’01.57”	0˚11’38.88”
AQL2 – East	The air quality monitoring equipment was mounted towards the project site's eastern side, towards Accra Sports Stadium.	5˚33’01.68”	0˚11’36.74”

4.3.6.1 Particulate Matter

Concentrations of TSP, PM_{10} and $PM_{2.5}$ in ambient air were monitored over a 24-hour period at each of the two (2) selected locations (Table 4.1), and the results were compared with the respective Ghana Standards. Particulate concentrations recorded at the Western Side of the Project Site (AQL1) for TSP, PM_{10} and $PM_{2.5}$ were 166.7µg/m^3, 111.1µg/m3 and 62.3µg/$m^{3,}$ respectively. Similarly, concentrations recorded at the Eastern Side of the project site (AQL2) for TSP, PM_{10} and $PM_{2.5}$ were 115.2µg/m^3, 97.2µg/m^3 and 55.5µg/$m^{3,}$ respectively. Concentrations recorded for TSP, PM10 and $PM_{2.5}$ at both locations were above the respective

Ghana standards of 150µg/m^3, 70µg/m^3 and 35µg/m^3. Notable sources of particulates observed during the assessment include vehicular movement and wind-blown dust from the acute harmattan weather season. Figure 4.2 shows a comparative analysis of the results with Ghana Standards.

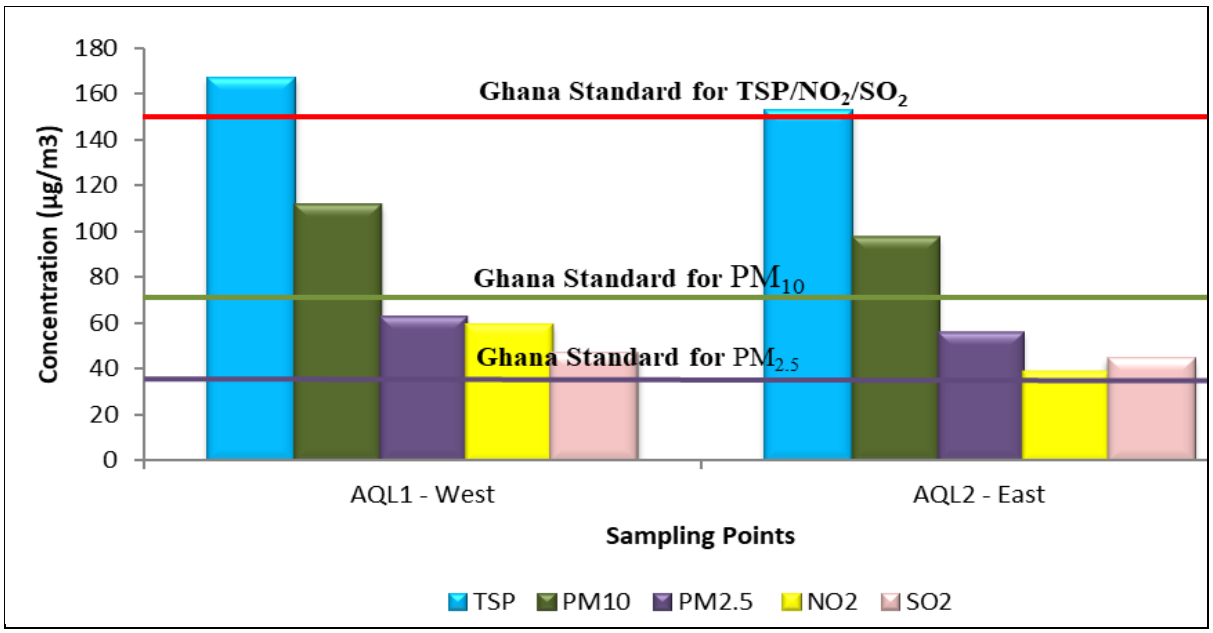

Figure 4. 2 Concentration of Air Emissions Concentration Comparison with Ghana Standard

Source: Ministry of Finance, 2023

4.3.6.2 Gaseous Emissions

Gaseous emissions monitoring was also carried out for nitrogen dioxide (NO_2) and sulphur dioxide (SO_2) for 24 hours. Concentrations recorded for NO_2 and SO_2 at the two locations were higher than the respective Ghana standards of 150 µg/m^3 and 50 µg/m^3. Gaseous emission sources observed were basically from the movement of vehicles and domestic activities.

4.3.7 Ambient Noise Levels

Noise levels recorded, computed and analysed for the 24 hours during monitoring at the Western and Eastern sections of the project site (Table 4.2) showed equivalent noise (LA_{eq}) levels of NSL1 (West) – 61.4 dB(A) and NSL2 (East) – 54.4dB(A) respectively for the day, and NSL1 (West) – 46.6 dB(A) and NSL2 (East) – 48.2 dB(A) respectively for the night.

The daytime equivalent noise level measured for NSL1 (West) exceeded the Ghana Standard permissible noise level of 55 dB(A) for Zone B (Educational and Health facilities, Office and

Law Courts). However, the daytime equivalent noise level measured for NSL2 (East) was within the Ghana Standard permissible noise level for Zone B. Primary noise sources observed during the monitoring period include noise from vehicular movement and driver honking. Figure 4.3 shows the noise levels compared to the Ghana Standard (GS 1222, 2018). The equivalent noise levels measured during the night-time monitoring for the two (2) sampling points (West and East) at the project site were within the Ghana Standard permissible noise level of 50 dB(A) for Zone B.

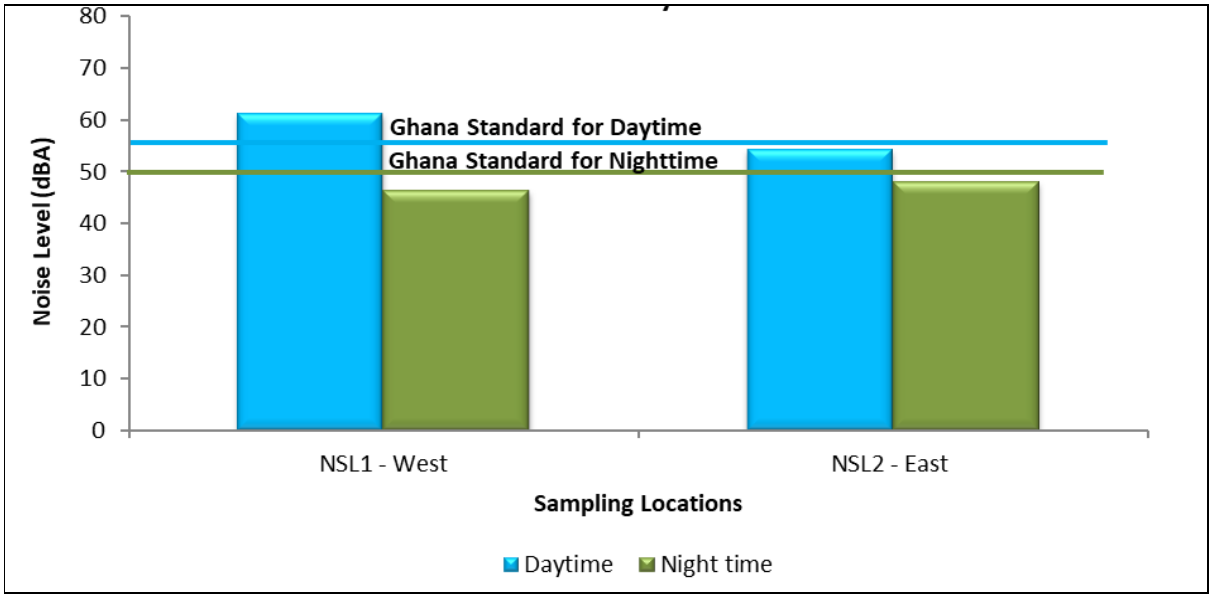

Figure 4. 3 Graphical Representation of the Noise Levels at the Proposed Site
Source: Ministry of Finance, 2023

4.4 Biological Environment

4.4.1 Vegetation

The vegetation of the Municipal areas has been altered in the more recent past century by climatic and other human factors. The terrestrial vegetation of the municipality consists of dense clusters of small trees and shrubs, which grow to an average height of six metres. The grass is a mixture of species found in the undergrowth of forests, and they are short, and rarely grow beyond One metre. Ground herbs are located on the edge of the shrub. They include species which normally flourish after fire. In addition to the natural vegetation zones, a number of introduced trees and shrubs thrive in the municipal area. Some trees in the municipality are neem, mangoes, acacias, avocados, coconuts, and palms. Introduced shrubs like Bougainvillea are also very prominent in the project municipal. The project site and adjoining areas are built environment with limited vegetation cover.

4.4.1.1 Flora Composition of the Project Area

Results from a biodiversity survey conducted at the project site indicated that are eleven (11) tree species (Table 4.3). The project area's trees (Figure 4.4) are mainly ornamental and fruit crop trees. Apart from the Manila Palm, all the other trees at the project site are widely distributed and are of minor conservation concern.

Table 4. 3 Tree Species Located at the Project Site and their IUCN Status

Family	Scientific Name	Common name	No. individuals	IUCN Status
Fabaceae	*Albizia lebbeck*	Woman's tongue tree	10	Least Concern
Moringaceae	*Moringa oleifera*	Moringa	1	Least Concern
Fabaceae	*Acacia auriculiformis*	Ear-leaf acacia	2	Least Concern
Arecaceae	*Veitchia merrillii*	Manila Palm	3	Vulnerable
Arecaceae	*Elaeis guineensis*	African Oil Palm	2	Least Concern
Rutaceae	*Citrus aurantium*	Orange	1	Least Concern
Asteraceae	*Vernonia amygdalina*	Bitter leaf	1	Least Concern
Meliaceae	*Azadirachta indica*	Neem	2	Least Concern
Anacardiaceae	*Mangifera indica*	Mango	7	Data Deficient
Arecaceae	*Cocos nucifera*	Coconut	1	Least Concern
Caricaceae	*Carica papaya*	Pawpaw	2	Data Deficient

Figure 4. 4 Some Trees Located at the Project Site

4.4.2 Fauna Composition of the Project Area

The fauna in the project area is similar to that of the moist semi-deciduous forest, but except for some species of birds, reptiles and insects, most of them have been decimated through hunting and general habitat degradation.

i. Birds - Resident species include the hooded vulture (*Neophron monachus*), Pied crow (*Corrus albas*), Cattle egrets (*Ardeola ibis*), and Grey headed/common bulbul (*Pycnonotus barbatus*). These are common Ghanaian species that are associated with forest habitats. No globally threatened species was observed in the project area.
ii. Reptiles - The common ones include the Agama lizard (*Agama agama*). wall gecko (*Gekkonidae*) and black cobra (*Naja melanoleuca*).
iii. Insects - Various pests and beneficial insects can be found in the area. These include various species of bees (e.g., *Apis mellifera*), moths (e.g., *Thaumatotibia leucotreta*), butterflies (e.g., *Battus polydamas*), mosquitoes (*Anophelis gambiae*) and ants (*Cataulacus guineensis*).
iv. Mammals - Various rodents and some domesticated animals can be found in the area. These include mice, rats, sheep, goats, and pigs.

4.5 Socio-Economic Baseline

4.5.1 Population and Demographics

According to the 2021 Population and Housing Census, the estimated population of the Korle Klottey Municipality was 68,6333, about 12.6% of the population (5,455,692) of the Greater Accra Region. About 48.2 % or 33,108 of the estimated population are males, and 51.8% or 35,525 are females. The entire population in the municipality live in urban locations.

4.5.2 Land Use

The built environment has almost overtaken the project municipality's natural environment. The increase in the built environment space is mainly attributed to the rapid rate of urbanisation in the Greater Accra Region. The Korle Klottey Municipality is a hub for the head offices of governmental and multinational institutions. The areas surrounding the proposed project sites (Figure 2.3) are built-up areas and host head offices of Ministries, Departments and Agencies (MDAs).

4.5.3 Socio-economic Activities

Livelihood activities (Figure 4.5) located close to the proposed project site are petty traders, mostly food vendors, mobile money service agents, a coconut seller and a cobbler/ shoemaker. There is a squatter residing close to the project site.

Figure 4. 5 Economic Activities Close to Project Site

4.5.4 Traffic Conditions and Forecast

Traffic studies were conducted in the project vicinity to quantify the current/existing traffic flows along the existing road network within the project zone. The studies were conducted from 25th to 27 of February 2023 between 6am to 6pm each day around the project site. The summary results of peak hour traffic on the various links and intersections are presented in Tables 4.4 to 4.6.

Table 4. 4 Summary Results of 12hr traffic Flows Along Starlet 91 Street – Stadium Junction

Classification	25th February	27th February
Cycles	212	197
Motor bike	892	1721
3-wheel cycle	105	27
Taxis	1568	2096
Private cars	2305	5736
Pick up/4wd	1248	5176
Small bus/van	445	760
Medium bus/mammy wagon	20	65
Large bus	14	4
Light truck	93	109
Medium truck	34	40
Heavy truck	14	30
Semi-trailer (light)	2	0
Semi-trailer (heavy)	4	7
Truck trailer	1	1
Extra-large truck	2	25

Table 4. 5 Summary Results of 12hr Traffic Flows along Starlet 91 Street – GRA Junction

Classification	25th February	27th February
Cycles	145	123
Motor bike	530	966
3-wheel cycle	31	48
Taxis	1186	1705
Private cars	1522	4802
Pick up/4wd	656	3820
Small bus/van	427	690
Medium bus/mammy wagon	10	32
Large bus	4	13
Light truck	80	72
Medium truck	21	31
Heavy truck	3	26
Semi-trailer (light)	0	5
Semi-trailer (heavy)	0	1
Truck trailer	1	1
Extra-large truck	13	19

4.5.4.1 Trip Assignment to Routes

The trips assigned to the existing road network during the operations of the proposed development were computed by adding the generated trips from the proposed development to the current traffic on the existing road network. The total traffic in the road network after the completion of the proposed development is presented in Table 4.6.

Table 4. 6 Assignment of the Total Traffic Flows along the Existing Transport Infrastructure

Existing Peak Traffic Flows	Generated Traffic Assigned from the Proposed Development	Total Traffic on Existing Road Network after Trip Assignment
79	55	134

4.5.4.2 Parking Requirements

Planning Standards (Part 2) of the zoning guidelines and planning standards (November 2011) recommends in Table 5 for the car parking requirements. It provides as follows:

i. Public buildings & places of Assembly – 1 parking space per 40m^2

The demand for parking is estimated from the parking rates and the appropriate measure of the proposed size. Table 4.7 shows the estimated parking demand.

Table 4. 7 Estimation of Parking Demand

Proxy Site	Gross Floor Area	Parking Demand Rate	Parking Required	Parking Provided
Offices	500 m^2	1 parking space per 40 m^2	13	20

The estimated parking requirement for the proposed development is 13 spaces, and the parking provision is 20, which is adequate parking. The required parking excludes the parking needed for the workers of the proposed facility.

4.5.5 Health

4.5.5.1 Health Institutions

There are twenty-one (21) health institutions in the municipality. The health institutions comprise six (6) health institutions, eleven (11) private health institutions and four (4) quasi-government health institutions (Table 4.8).

4.5.5.2 Top Out Patient Department Reported Cases

The top OPD cases in the project municipality are given in Table 4.8.

Table 4. 8 Health Facilities in Korle Klottey Municipality

S/n	Name Of Facility	Custodian	Location
1.	Osu Government Maternity Home	Government	Osu
2.	Regional Health Directorate (New site)	Government	Adabraka
3.	Regional Health Directorate	Government	Adabraka
4.	Accra Psychiatric Hospital	Government	Adabraka
5.	C&J Medicare	Private	Tudu
6.	Ridge Hospital	Government	Ridge
7.	Trust Hospital (SSNIT Hospital)	Quasi-Government	Osu
8.	GAK Clinic	Private	Osu-Nyaniba
9.	North Ridge Clinic	Private	North-Ridge
10.	Iran Clinic	Private	Circle
11.	SIC Bob Freeman Clinic	Quasi-Government	Adabraka (Near GOIL Headoffice)
12.	Bank of Ghana Clinic	Quasi-Government	Ridge
13.	Spaes Dental Clinic	Private	Ringway Estates
14.	Executive Health Care Unit	Private	Ringway Estates (Angola Road)
15.	Akai House Clinic	Private	Osu
16.	Rabito Clinic	Private	Osu
17.	Maabs Dental Clinic	Private	Osu
18.	Beijing Chinese Clinic	Private	Osu
19.	Parliament Clinic	Government	Osu
20.	Marcedarian Clinic	Private	Osu
21.	VRA Clinic	Quasi-Government	Osu

Source: KoKMA, 2023

Table 4. 9Top Out Patient Department Reported Cases in the Project Districts

Disease	Number of Cases
Malaria	5,087
Upper Respiratory Infections	4,948
Hypertension	4,554
Skin Disease	3,928
Rheumatism/Other joint pains/ Arthritis	3,623
Urinary Tract Infections	2,028
Diabetes Mellitus	1,537

Source: MoFEP, 2020

4.5.5.3 HIV Prevalence Rate

The HIV prevalence rate in the Greater Accra Region in 2019 was 2.4%, the highest among the country's sixteen (16) regions. The HIV prevalence rate in the Greater Accra Region was also higher than the national average of 1.7%. The HIV prevalence rate in the project municipality is 0.88% (Ghana AIDS Commission, 2020).

4.5.5.4 Coronavirus

The municipality recorded 446 case counts, 74 deaths (representing 12% of the national death toll) and 286 recoveries from coronavirus infections in the year 2020 (KoKMA MTDP 2022-2025).

4.5.6 Water and Sanitation

4.5.6.1 Water Supply

About 100% of households in the municipality are connected to pipe-born water. Potable water supply to the project municipality, including the project enclave, is supplied by Ghana Water Company Limited. The water supplies to the entire Greater Accra Region are sourced from the Weija Water Headworks, Kpong Water Headworks and the Teshie Desalination Plant.

4.5.6.2 Solid Waste Disposal

The average volume of solid waste generated in the project municipality is 136.89 tons daily. About 83% of the waste generated daily is collected. The uncollected waste is either burned or thrown into the gutters. Waste collection in the municipality is managed privately by Jekora Ventures. Private tricycle waste collectors offer door-to-door services to fill the gaps created by Jekora Ventures. Domestic and municipal waste collected into the municipality is either sent to the Kpone Landfill in the Kpone Katamaso Municipality or Adipa Landfill in the

Nsawam Adoagyiri Municipality. The two landfill sites (Kpone and Adepa) have specialised cells for disposing of hazardous waste.

4.5.6.3 Liquid Waste Disposal

A large proportion of households (44%) in the municipality use public toilets. About 43% of households use water closets, about 4.5% use KVIP and the rest (4%) resort to open defecation (KoKMA, 2023). Some areas in the Korle Klottey, including the Ministerial Enclave (project area), are connected to a centralised sewerage system. Liquid waste channelled into the centralised sewerage system is pumped to the Mudor Wastewater Treatment Plant, which Sewerage Systems Ghana Limited operates.

4.5.7 Electricity

The total installed capacity for existing plants in Ghana is 4,132MW consisting of Hydro 38%, Thermal 61% and Solar less than 1%. Almost every household in the Korle Klottey Municipality is connected to the national grid. The project area is connected to the national grid, and the electricity supply is reliable.

5.0 PUBLIC/STAKEHOLDER INVOLVEMENT

5.1 Purpose of Stakeholder Engagement

Stakeholders were engaged as required by good EA practice in line with the Ghana Environmental Assessment Regulations, 1999 (LI 1652) and the World Bank Group's Environmental Assessment Policy (OP 4.01), which also addresses the requirements for stakeholder consultation as part of the EA process.

Stakeholder engagements helped to:

- Engender openness and transparency in eliciting stakeholder contribution;
- Enhance the social acceptability of the project; and
- Improve projects' environmental and social sustainability and significantly contribute to successful project design and implementation.

5.2 Relevant Stakeholders Identified

The institutions identified for consultation have a regulatory mandate or some oversight responsibility in infrastructure development. On the other hand, the public refers to the local people, individuals, or communities likely to benefit or be adversely affected by the project.

In identifying the stakeholders, an initial prospective list was developed by matching the main components of the project (location/environmental features, project features, etc.), as well as potential impacts and baseline areas with the various stakeholder groups in a Stakeholder Identification Matrix (SIM). Table 5.1 lists the key stakeholders identified under the respective stakeholder categories. In contrast, Table 5.2 defines the matrix used to help elicit inputs from the various stakeholders concerning their relevance for involvement in the engagement processes.

Table 5. 1 Categorisation of Stakeholders

Stakeholders	
MDAs	• Environmental Protection Agency (EPA) • Labour Department (LD)
Local Government	• Korle Klottey Municipal Assembly (KoKMA) o Department of Works (DW) o Department of Social Welfare and Community Development (SWCDD) o Environmental Health and Sanitation Department (EHSD)

	○ National Disaster Management Organisation (NADMO) ○ Physical Planning and Development Department (PPDD) • Accra Metro Sewage Unit (AMSU)
Enforcement Agencies	• Environmental Protection Agency • Ghana Police Service (GPS) • Ghana National Fire Service
Utility Companies	• Ghana Water Company Ltd (GWCL) • Electricity Company of Ghana (ECG)
Project Affected Persons	• Traders at the Labour Department (TLD)
Vulnerable Groups	• Ghana Federation of Disability Organisations

Table 5. 2 Stakeholder Identification Matrix

Stakeholder Categories **Project Activities, Impacts/Issues**	**MDAs**	**Local Government**	**Utility Companies**	**Enforcement /Protection Agencies**	**Vulnerable Groups**	**Project Affected Persons**
Disruption to services	EC DUR	KoKMA AMSU	GWCL ECG			
Air quality and odour	EPA	KoKMA		EPA	PWDs	TLD
Noise and vibration	EPA	KoKMA		EPA	PWD	TLD
Flooding	EPA	NADMO				
Public health and safety risks	EPA DUR	KoKMA KoKMHD		EPA		
Occupational health and safety risk	EPA	KoKMA KoKMHD		EPA		
Disruption of economic activities and physical displacement	EPA	KoKMA WD		EPA		TLD
Waste handling and disposal impact	EPA	KoKMA EHSD AMSU		EPA		
Impacts and risks from labour influx	EPA	KoKMA SWCDD		EPA		TLD
Teenage Pregnancy	EPA	KoKMA				
Discrimination of vulnerable groups in employment	EPA	KoKMA SWCDD				
Gender-based violence/sexual harassment	EPA	KoKMA SWCDD		EPA GPS	PWD	TLD
Child labour	EPA	KoKMA SWCDD		EPA	PWD	TLD

HIV/AIDS	EPA	KoKMHD		EPA		
COVID-19	EPA	KoKMHD		EPA		

5.3 Stakeholder Engagement Highlights

Highlights of the issues/concerns and suggestions from the stakeholder engagements are summarized in Table 5.3 and presented in detail in Appendix 1. This informed the assessment of potential impacts and appraised the management and monitoring plans.

Table 5. 3 Engagement Highlights

Stakeholders	Key Highlights
EPA	• The registration of the project will begin with the filling of Form EA1 • The proposed project will require the preparation of a Preliminary Environmental Assessment (PEA) • The construction site should be hoarded to provide safety, security, and protection for the public and construction employees
GNFS	• Fire outbreak is rampant in the jurisdiction during the dry season. • The electricity power supply should be disconnected before demolition and reconstruction commence. • A Fire Permit should be applied for the construction of the building. • GNFS will have to look at the building plan to approve where the exit door should be located, how many exit doors the building should have and the type of door appropriate for the structure before issuing the fire permit
GPS	• Crime rate is not rampant in the ministerial enclave. Crimes normally reported in the enclave include petty theft, break-in, etc. Crimes of this nature are normally perpetrated by the workers in the offices. • Major crimes usually are recorded around Tudu, Agbogbloshie, Art Centre, Jamestown, Graphic Road, Accra Central and High Street.
LD	Challenges with the old labour Department include: • The structure has no washroom for visiting clients. • Some of the roofing is removed, and others have caved in • Potholes in the floor • Spillage of sewage system
PAPs	• The majority of the traders trade petty trading such as sales of fruits, coconut, foodstuff, mushroom, etc. Some earn 200 cedis daily others earn 25 cedis. Others are married, whilst others are single mothers or divorced with about three (3) or more dependents. Some traders would prefer a place to be relocated to for their business. Others would prefer compensation.
GWCL	• Ghana water company mostly have their pipes lines laid along roads. Due to that, during demolition and reconstruction, utility lines should be located to prevent disruptions. • The demand for water supply will increase in the labour department due to the additional facilities that will be added after the reconstruction. There will be a higher demand for water compared in the new structure compared to the old structure.

KoKMA EHSD	• The municipality does not have a designated site for construction waste, and the project implementers are responsible for finding a suitable site to dump construction debris. • The municipality has one waste management company, that is Jekora Ventures. Jekora does door-to-door or private collections. They also do general cleaning. Zoomlion Ghana Limited provides a public service known as the Sanitation Improvement Package (SIP). • Special waste can be taken to either the Kpone Landfill Site or Adepa Landfill Site
KoKMA PPDD	Documents needed to apply for a demolition permit include the following: • Land title certificate • Architectural drawing of the old structure • Pictures of the existing structure • Property rate receipt • Demolition plan • Waste management plan (including how noise and air pollution will be mitigated) • The Municipal Physical Planner and Municipal Engineer must be notified 48 hours before any demolition activity. The assembly will visit the site for inspection before the demolition day. • When demolition is completed, the assembly must be notified to visit the site to inspect whether everything is going on according to the waste management plan. Documents needed to apply for a construction permit include the following: • Indenture • Architectural drawings • Structural drawings • Electrical drawings • Plumbing works • Fire Permit • Geotechnical report • Structural design • Environmental permit • Traffic impact assessment • Waste management plan.
KoKMA SWCDD	• Cases of GBVs and social exploitation are hardly reported by the victims. The few cases reported are referred to DOVVSU. • There are a lot of children on the streets who have moved from their villages to the capital in search of greener pastures. • Their hopes of getting work are dashed since there is no system created for them to fit into; thus, they become stranded on the street.
KoKMA WD	• Officers from the WD will visit the site during the project implementation activities • The sandcrate should be watered before the demolition to prevent dust.
KoKMA NADMO	• The ministerial enclave does not usually record flooding, but the area around the Access Bank, close to the Accra Sports Stadium, usually experiences floods when it rains.
PWDs	• The project should be accessible to PWDs
AMSU	• Apart from the Accra Sports Stadium, the entire ministerial enclave is connected to a sewerage line • The demolition of the old structure and sewage pipes in the area should be identified and marked to avoid the destruction of the sewerage network.

ECG	• The project area has a reliable electricity supply. • The Electricity Company must be notified before demolition activities.

6.0 IDENTIFICATION AND EVALUATION OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

6.1 Methodology

The potential impacts and risks likely to be associated with the Redevelopment of the Labour Department Head Office have been assessed based on information collected during field visits and a literature review of similar projects. The significance of each impact was evaluated, taking into consideration stakeholders' opinions and applicable national, international, and industry standards. Each environmental and social issue impact will be identified and characterised by its nature, duration, extent, and scale. This will interact to determine the magnitude of the impacts or risks (see Table 6.1 for the definition of the various variables).

Table 6. 1 Definition for Level of Impacts

Term	Definition
Nature of Predicted Impacts	
Neutral	No overall environmental and social impacts or risks.
Adverse	Negative environmental and social impacts or risks.
Beneficial	Positive environmental and social impacts or risks
Duration of Predicted Impact	
Short-term	Impact persists for six months or less (i.e., during the construction period).
Medium-term	Impact persisting for between six months and two years (including the construction phase through to during initial phases of operations)
Long-term	Impact persisting for longer than two years
Scale of Predicted Impacts	
Small	The impact will affect less than 5% of the estimated population of the project catchment.
Medium	The impact will affect between 5-10% of the estimated population of the project catchment.
Large	The impact is greater than 10% of the project catchment.
Sensitivity/ Vulnerability/Importance/Value of Receiving Media or Receptor	
High	Receptor/Media is rare, legally protected (by national law or international law, treaty or convention) Receptor/Media susceptible to irreversible alteration/damage to its functioning (e.g., mortality, extinction, long term injury or morbidity due to anticipated impact/risk
Medium	Receptor/media susceptible to damage/alteration without comprise to its function and continued existence, e.g., injury and short morbidity due to the impact or risk.

Low	Receptor/media is impacted but not susceptible to any damage/alteration due to the impact/risk.
**Extent of Predicted Impact*	
Localised	Impact/Risk is limited to the site and demarcated project zone, community or the immediate source of the impact/risk the
Regional	Impact/Risk extends beyond the project community into the GAMA region but is limited to Ghana.
Global	Impact/risk extends beyond Ghana.
**Looking at the project activities, the extent of the predicted impacts /risks will be only localised or regional.*	

The magnitude of the impact/risk (high, medium and low) is measured by considering the following variables; extent, duration, and scale of the impact. Table 6.2 below indicates how these variables interact to determine the magnitude of impacts/risks for the proposed project.

Table 6. 2 Risk Evaluation/Assessment Criteria- Extent and Duration

S/n	Impact Characteristics			Magnitude of Impact/Risks
	Extent	**Duration**	**Scale**	
1.	Localised	Long term	Large	High
2.	Localised	Long term	Medium	Moderate
3.	Localised	Long term	Small	Low
4.	Localised	Medium term	Large	Moderate
5.	Localised	Medium term	Medium	Moderate
6.	Localised	Medium term	Small	Low
7.	Localised	Short term	Large	Moderate
8.	Localised	Short term	Medium	Low
9.	Localised	Short term	Small	Low
10.	Regional	Long term	Large	High
11.	Regional	Long term	Medium	High
12.	Regional	Long term	Small	High
13.	Regional	Medium term	Large	Moderate
14.	Regional	Medium term	Medium	Moderate
15.	Regional	Medium term	Small	Moderate
16.	Regional	Short term	Large	High
17.	Regional	Short term	Medium	Moderate
18.	Regional	Short term	Small	Moderate

Based on the combination of magnitude and importance/sensitivity/value/vulnerability, a number of possible outcomes can be obtained in terms of the significance of an identified impact/risk (see Table 6.3 below).

Table 6. 3 Significant Assessment Criteria

Magnitude	Sensitivity/ Vulnerability/ Importance		
	Low	Medium	High
Low	Insignificant	Moderate	Moderate
Moderate	Moderate	Moderate	Significant
High	Moderate	Significant	Highly Significant

6.2 Beneficial Impacts

Potential benefits to be derived from the project implementation will include the following:

6.2.1 Creation of Employment Opportunities

The project will offer great opportunities for economic and social development. The construction phase is expected to take up to about thirteen (13) months, involving an estimated workforce (both skilled and unskilled) of 60 persons (Table 2.4) in all the selected project communities employed at various stages of this phase. Those hired will gain some meaningful income in the form of wages. In addition, local food vendors and other itinerant traders will provide food and other services for the site workers.

6.2.2 Reduced Impacts on the Physical Environment

During the project's occupancy phase, the facility will rely extensively on renewable energy sources (GTSS) for electricity generation. GTSS will reduce the facility's dependency on the national grid, which has about 61% of its source generated from thermal energy. The GTSS will also export the excess electricity generated from the system to the national grid; this, though not significant, will contribute to the renewable energy mix in the national grid. The proposed facility will harvest daylight to reduce reliance on electrical power for illumination. The high dependency on renewable energy sources for electricity generation will lead to a reduction in greenhouse gas emissions (responsible for global warming).

6.2.3 Enhanced Accessibility and Operations of the Labour Department

The Labour Department Head Office is at present in a dilapidated state. The deplorable condition of the facility creates a safety risk to workers, clients and other users of the Labour Department Head Office. Besides the safety risks, most of the Labour Department Head Office facilities are old-fashioned and unsuitable. The facilities in the structure are not accessible to PWDs. The project, upon completion, will have modern working facilities, including ICT

facilities, to enhance the operations of the Department. The Redeveloped Labour Department Head Office facilities will also be accessible to PWDs.

6.3 Adverse Risks and Impacts

The potential adverse environmental and social risks and impacts that could arise from the project implementation are grouped under three main areas as follows:

- Pre-construction phase risks and impacts -
    - Potential socio-economic and livelihoods impacts; and
    - Disruption of utility services.
- Construction phase risks and impacts -
    - Waste handling and disposal impacts;
    - Potential vehicular traffic and accidents;
    - Potential impacts of raw material sourcing;
    - Loss of vegetation cover;
    - Potential impacts on air quality;
    - Public and occupational health and safety risks;
    - Noise and vibration impacts;
    - Potential fire risks;
    - Risk of potential spills;
    - Potential poor working conditions;
    - Potential use of child labour on site;
    - Incidents of Gender-Based Violence, Sexual Exploitation and Abuse;
    - Potential risk of spread of HIV/AIDS; and
    - Risk of contracting and spreading of coronavirus disease.

- Operational phase risks and impacts -
    - Waste handling and disposal impacts;
    - Potential impacts on air quality; and
    - Potential fire risks.

6.3.1 Pre-construction Risks and Impacts

6.3.1.1 Socio-economic and Livelihoods Impacts

The socio-economic activities located within the direct area of influence of the project are petty traders, food sellers, artisan (a cobbler) and a squatter. Twenty-two (22) people are engaged in these socioeconomic activities. Construction activities will pose public safety risks to the socioeconomic activities and disrupt the livelihoods of the twenty-two identified PAPs within the project's direct area of influence. The socio-economic impacts are all significant issues and trigger the World Bank's Policy on Involuntary Resettlement (OP4.12).

6.3.1.2 Disruption of Utility Services

Disconnection of utility services infrastructure (water, electricity, sewerage line and communication lines) before construction activities, if not coordinated with the respective utility companies, could disrupt utility services to other users of such facilities within the project enclave. Such disruptions will be a nuisance (such as blackouts and spillage of water and liquid waste) to institutions in the project area. Utility disruptions are rated moderate, short term and localized impacts.

6.3.2 Construction Phase Risks and Impacts

6.3.2.1 Waste Handling and Disposal Impacts

The sources of waste to be generated during the construction phase will include:

- Old asbestos roofing sheets;
- Construction waste – demolition spoil, Sandcrete, packaging materials, pieces of PVC pipes, cables, glass, metals, etc.;
- Domestic waste – plastics, papers, leftover food, etc.;
- Liquid waste – faecal matter and urine; and
- Contaminates/hazardous waste – spent oil.

Old Asbestos Roofing Sheets

Demolition of the Old Labour Department Structures will involve the removal of about 180 pieces of asbestos roofing sheets. Asbestos is known to cause asbestosis, lung cancer and mesothelioma when fine air-borne asbestos fibres are inhaled and lodged in the respiratory tract and lungs and subsequently get into the bloodstream (Mayo Clinic, 2023). Construction workers and workers of institutions close to the project site as well as the general public could be exposed to the risk during the removal of the roofing sheets when the removal action causes

the asbestos fibres to be released into the air and breathed in by the workers. Workers loading the removed roofing sheets at the temporary storage sites and unloading at the landfill site could also be exposed to asbestos fibres. Since the roofing sheets would be of value to the community folks close to the project site, there could be a scramble for them by the people in neighbouring communities should the sheets be left at their disposal. Community people could be exposed to the health risk of asbestos roofing while salvaging them. Exposure to asbestos fibres could result in long-term health risks; hence, the impact is ranked significant.

Construction Waste

Land preparation activities for construction will involve demolishing the entire Labour Department structure, and excavations will follow the demolition activities. The two activities would generate about 600m^3 of demolition spoil (mostly broken sandcrete) and some 800m^3 of excavated spoil (comprising of soil). Added to these would be packaging materials and construction debris, which typically comprise pieces of broken concrete and pipes, electrical cables, broken wood, nails, and glass. Demolished and excavated waste materials generated from the construction site could be heaped or dumped at fallow areas such as the banks of the Klottey Lagoon (located about 4km from the project site) and the seashore (which typically have isolated areas that can be exploited for waste dumping). The likelihoods of occurrence of the above impact are high, though localised, and the significance is therefore ranked medium.

Domestic Waste

The up to 60 workers engaged in construction activities would generate domestic solid waste and sewage. Domestic waste generated at construction worksites usually comprises food and water packaging and organic waste, mainly food leftovers. Organic matter, excavated material, and debris generated from construction activities could be heaped or dumped close to the project area. These waste streams could be washed into the drains, impeding water flow during downpours and resulting in a flood. Water could also collect in the disposed of mass (especially empty material containers) and promote the breeding mosquitoes and other disease-causing vectors and pathogens. The workers of institutions close to the project site could be exposed to infectious diseases such as cholera and malaria due to poor housekeeping by the construction workers. A low volume of domestic waste is expected to be generated during the construction phase, and the impact would be localized. However, regarding sensitivity, disease infections

could lead to mortality among the affected populace and are therefore ranked high. The significance of the impact is consequently ranked significant.

Liquid Waste

Workers could practice open defecation at the seashore (about 1.2km from the project site) if adequate toilet facilities are not provided at the construction site. The practice of open defecation at the seas could result in washing faecal matter (containing coliforms) into the sea. Faecal coliforms washed into the sea could be ingested by marine species and enter the food chain when consumed by the general public. The general public could be exposed to infectious diseases, such as cholera, diarrhoea, typhoid fever, and dysentery when they consume contaminated marine organisms. The likelihood of open defecation is ranked high. Though the construction period will be short-term, the impacts of sea pollution from open defecation will be regional, ranking the impact high.

Hazardous Waste

Servicing construction machinery and equipment during the 13 months of construction activities would generate about 40 litres of spent oil monthly. Workers could dispose of waste oil onto open vacant plots, fallow areas, etc., due to the lack of knowledge on the storage, physical, and environmental hazards of spent oils (Akpakpavi, 2015). When spent oil is disposed of inappropriately, the hydrocarbons adhere to the soil's surface and could contaminate groundwater. The likelihood of waste oil disposal is low, and however, spent fuel oil could persist in the environment, therefore ranked medium.

6.3.2.2 Potential Vehicular Traffic and Accidents

Haulage of demolished waste and construction materials and equipment will involve about (x 1) haulage truck trips to and from the construction site over a 2-month period. This will translate into 1 trip by 1 truck ($45m^3$) daily. The movement of these vehicles could pose the following risks to other road users, pedestrians, and the general public:

- Potential accidents on roads and major junctions;
- Potential increased traffic congestion, especially at peak periods; and
- Breakdown of haulage vehicles in transit obstructing traffic and causing accidents.

The Prof. Mills High Street – 28th February Road – Independent Avenue Road – Castle Road, the main access routes from the project site, are highly trafficked roads. The introduction of haulage vehicles to and from the site could impact the existing traffic situation during morning and evening peak periods, creating delays for road users travelling to various destinations. The introduction of haulage vehicles to and from the site could impact the existing traffic situation during morning and evening peak periods, creating delays for road users travelling to various destinations.

Reckless driving of haulage trucks, which includes over speeding, tailgating, aggressive driving, drunk driving, distracted driving, failing to use turn signals, and failure to yield the right-of-way, can cause road accidents and potential injuries and fatalities. This could be as a result of the nonchalant attitude of drivers or the lack of understanding of the code of driving, road signs, and signals. Driver fatigue could also result in road accidents.

Driving in fleets can significantly slow down traffic and create a traffic backlog, especially when entering and exiting these roads, since haulage trucks are known to manoeuvre slowly. Attempts to overtake such fleets or failure of the trucks to cede or give way to overtaking vehicles could pose accident risks, especially on single-carriage roads.

Breakdown of haulage trucks along the route could lead to traffic congestion, delay delivery of materials and serve as a death trap, especially at night for other road users.

The impacts of vehicular traffic and accident risks will be limited to the 13-month construction period(short-term). The magnitude of the impact will be along the haulage routes and access routes to the project site, which makes it of medium scale, and the impact is therefore ranked significant.

6.3.2.3 Potential Impacts of Raw Material Sourcing

- *Construction Phase*

Construction activities will involve the use of materials from the natural environment, such as sand, water, wood and quarry stones. The contractors could source these materials from poorly managed and uncertified sources. This could result in possible adverse externalities, such as rainwater collecting in the burrow pits and depressions, creating pools of stagnant water.

Stagnant water provides a suitable habitat for breeding mosquitoes and snails, which are vectors for the bacteria that cause malaria and bilharzia. The excavated pits could serve as death traps for animals and human beings near the sand and burrow pits.

The impact of the project is localised, long-term, and small-scale. However, it is of medium magnitude and can lead to the destruction of the natural ecosystem and the breeding of disease vectors making it highly sensitive. The impact is therefore rated significant because of the high sensitivity and medium rating in terms of magnitude.

6.3.2.4 Loss of Vegetation Cover

A total of seven (7) trees consisting of four (4) *Azadirachta indica* (nim trees) and three (3) *Mangefira indica* (mango trees) will be cleared to make way for the project. The trees support the local ecosystem and improve the micro-climate of the project zone. Removal of the vegetation cover on site is rated as moderate, localised and short-term.

6.3.2.5 Potential Impacts on Air Quality

Particulate matter (TSP, PM_{10} and $PM_{2.5}$) and gaseous emissions (NO_2 and SO_2) recorded at the project site (Figure 4.2) were generally poor and above the Ghana Standard (GS 1236:2019). The potential sources of impact on air quality during the construction phase will come from demolishing the existing structures and land preparatory activities (re-grading). Other sources of impact on air quality will emanate from fly-offs and dust blown from haulage of excavation spoil and fine aggregate construction materials (e.g., sand and gravels); and exhaust fumes from the combustion of fossil fuel by construction equipment and machinery. The construction activities' duration (13 months) would lead to elevated levels of particulate matter and gaseous emissions at the project site and haulage route. Workers and community members along the haulage routes would be the recipient of the potential poor air quality impacts from construction-related activities. Prolonged exposure to PM, NO_2 and SO_2 may increase the risk of respiratory tract infections through the pollutants' interaction with the immune system (Tze-Ming Chen *et al,* 2007). Hence, the impact is ranked as significant.

6.3.2.6 Public and Occupational Health and Safety Risks

The operation of various equipment, machinery, and construction activities will expose the site workers to work-related injuries such as falls, cuts and burns. These may be due to human

errors, workers not wearing PPEs and mechanical faults on equipment or improper fixing, handling or operation of equipment such as cranes, scaffolds and concrete mixers. Another occupational health and safety risk source is exposure to toxic chemicals such as lead-based paints and thinners, which may contain Volatile Organic Compounds (VOCs). Workers who are not medically fit to undertake certain construction activities may unknowingly engage in the activities putting themselves at risk. Vehicular and machinery movement, such as haulage of materials or movement of construction machinery on operation on site, could result in knockdowns. Construction workers could be at risk of knockdowns or run-over due to unorganised manoeuvring of trucks, careless driving, speeding, as well as unsupervised reversing or turning of trucks. Public and occupational health and safety risks are rated significant because they lead to mortality and long-term morbidity, and it is localised and short-term.

6.3.2.7 Noise and Vibration Impacts

Background ambient noise levels recorded during the day (Figure 4.3) are above the Ghana Standard (GS 1222, 2018) recommended noise levels for Zone B (Educational and Health facilities, Office and Law Courts). Demolishing existing structures and felling and pruning trees using a chainsaw and other on-site equipment will increase noise levels within the project zone. The noise generated from construction-related activities will create short-term inconveniences for workers and the general public close to the project site. Intermittent noise would be generated during the construction phase of the project. The background noise level and ground vibration at the site will increase due to the movement of construction trucks carting construction waste from the project site and delivering construction materials to the project site. Other sources of noise pollution will come from the movement or operations of heavy earthmoving equipment and machinery, such as excavators and concrete mixers, during earthworks.

The project site is in a sensitive zone, comprising offices with many workers and clients. Noise pollution and vibration associated with the construction phase are rated significant but will be localized and short-term.

6.3.2.8 Potential Fire Risks

Construction phase ignition sources could be lit cigarette butts, naked flames from matches dropped by smoking workers, or sparks from welding activities. When ignitions come in contact with flammable materials, this could start an unintended fire. This can spread to the whole site and cause damage to construction machinery and vehicles and affect some of the workers nearby. Fire outbreaks from the project site could also spread to other offices and facilities close to the project site and lead to the destruction of properties. The effects of fire outbreaks will be localised and short-term; hence the magnitude is low. However, it is highly sensitive since a fire outbreak can lead to fatalities, injuries, and the destruction of properties. Hence, the impact is ranked significant.

6.3.2.9 Risk of Potential Spills

Oil, fuel, lubricants, and paint in transit or storage can spill accidentally. Spillage and/or dripping of oil and fuel can also occur during the operation and/or maintenance of construction vehicles and equipment. These can percolate the soil contaminating the soil and groundwater resources. The spilt material can be washed by runoff into drains and surface water. The impact of spills is rated significant because it has human health and eco-system disruption implications, but it is short-term and localised.

6.3.2.10 Potential Poor Working Conditions

Workers may be paid rates below the stipulated national minimum wage or work under poor service conditions without contracts if the necessary actions are not implemented to guarantee their rights and define conditions of service to ensure proper working conditions. Poor labour working conditions are rated moderate scale, localized, and short term. Hence, this impact is low in magnitude. It is also highly sensitive since subjecting employees to poor conditions of service and working conditions is against Ghana's labour laws, such as the Labour Act 2003.

6.3.2.11 Potential Use of Child Labour on Site

There is a tendency for Contractors and Sub-Contractors to engage children below 18 years on-site, exposing them to hazards associated with civil works, such as digging trenches and concrete mixing, which can adversely affect their educational attainment, health, and development. Consultations with the Social Welfare Department of the Korle Klottey and the Ghana Police Service (Ministries Division) indicated that streetism is very high in the project

municipality and adjoining districts. Street children in slum localities (e.g., Arts Centre, Children's Park and Agbogbloshie) close to the project site could avail themselves of employment opportunities during recruitment. The incidence of child labour is short-term as it is limited to a thirteen-month construction period, regional, as the work will be drawn from the GAMA region but small scale as there will only be a maximum of sixty (60) workers on site. In terms of sensitivity, the incidence of child labour is highly sensitive as both national law and international conventions ratified by Ghana abhor the practice of child labour. Child labour can also result in long-term health and psychological problems for the children involved. The incidence of child labour is rated moderately significant as it is low in magnitude but high in sensitivity.

6.3.2.12 Incidents of Gender-Based Violence, Sexual Exploitation and Abuse

The project site is located close to low-income communities such as Osu, Labadi and Jamestown. Construction workers working at the project site with relatively high incomes could lure food vendors and other petty traders who supply them with food and other services and defile or rape them. Workers may also physically and verbally abuse hawkers, petty traders, and food vendors over a misunderstanding over prices of goods and services and other issues.

Project managers and supervisors may solicit sexual favours in exchange for employment opportunities, during negotiations for pay increments and improved conditions of service, or in the assignment of tasks on site. Women may also be denied employment opportunities and/or their services may be undervalued because of cultural norms. The incidence of rape, defilement, and other forms of Gender Based Violence is rated regional, short-term, and small-scale, making it moderate in terms of magnitude. However, the perpetration of rape, defilement and other forms of Gender Based Violence is against national laws and international conventions. Its effects include long-term morbidity, including STIs infection, emotional trauma, and disorders. Given the foregone discussions, the incidence of Gender Based Violence is assigned a high rating in terms of sensitivity. Since the incidence of gender-based violence has a high sensitivity and moderate magnitude rating, it is assigned a significant impact.

6.3.2.13 Potential Risk of Spread of HIV/AIDS

The nation's goal through the Ghana AIDS Commission is to prevent new HIV infections as well as to mitigate the socio-economic and psychological effects of HIV/AIDS on individuals,

communities, and the nation as a whole. The HIV prevalence rate for the Greater Accra Region is 2.5%, much higher than the national prevalence of 1.67% (2017 HIV Sentinel Survey Report). Having casual sex with an infected person has been a common means of transmitting HIV/AIDS. Before a sexual episode, the parties involved usually had prior acquaintance.

The project's construction phase will attract food vendors who will provide services to the construction workers. Hence, the likelihood of interaction with construction workers would be high. Although the workers will not be housed at the site, some arrangements for casual sex could be made nevertheless out of these interactions. Workers' interactions with female food vendors can hardly be controlled.

6.3.3 Operational Phase Risks and Impacts

6.3.3.1 Waste Handling and Disposal Impacts

The types of waste to be generated during the occupancy phase will be liquid, solid, and electronic waste. At full occupancy of the facility, the water intake will be approximately 5,000 litres per day, and over 80% of the water will be discharged as wastewater from kitchenettes and toilets. Domestic solid waste, such as food residue and paper, will constitute the bulk of the solid waste generated by employees and clients using the facility during the occupancy phase of the project. The waste generation could result in public health risks among the workers and other users of the facility if not well managed. Poor waste management will also lead to the breeding of pests and rodents.

Electronic and electrical waste sources will come from broken down and obsolete or end electrical gadgets and accessories (e.g., communication equipment, air conditioners, bulbs and solar panels, etc.). The indiscriminate disposal of electrical and electronic wastes is a major concern as scavengers may engage in hazardous handling methods, posing health risks to the handlers and polluting the environment.

Waste generation-related impacts are significant because poor methods of collection, storage, transportation and disposal of liquid and solid waste at the premises during the occupancy phase of the project can cause or facilitate the outbreak and spread of sanitary-related diseases like typhoid fever and diarrhoea among employees of Labour Department, clients, visitors. Exposure to electronic and electrical waste could result in long-term health effects. Waste generation impacts are also regional and long-term.

6.3.3.2 Potential Impacts on Air Quality

The operation of the standby generator will be the major source of emissions from the premises during the occupancy phase of the project. This will, however, be insignificant, short term and localized.

6.3.3.3 Potential Fire Risks

During the operational phase, ignition from a match in contact with leaking liquefied petroleum gas (LPG) for cooking and other activities could result in an explosion. The smoke produced will spread vertically, reaching upper levels to cause asphyxiation to occupants. In a panic, residents may rush and cause a stampede at the exit point, prolonging the danger.

Faulty electrical equipment, such as air conditioners or water dispensers, as well as defective wiring and overloaded power outlets, could start a fire in any section of the facility. Workers, clients and other facility users could be at risk of injuries and facilities in the event of a fire outbreak.

7.0 ENVIRONMENT AND SOCIAL MITIGATION AND MANAGEMENT PLAN

7.1 Introduction

This chapter describes the measures that will be implemented to avoid, minimise/remedy or compensate for the anticipated social and environmental impacts/risks of the proposed sub-project. These are presented in Table 7.1, together with responsible entities for implementation and supervision. The ESMP also includes environmental and social monitoring indicators, cost and responsibility for monitoring.

Table 7. 1 Environmental and Social Impacts and Mitigation Plan

Impact	Source	Mitigation Measure	Responsible Party	Cost ($)
Pre-construction Phase				
Socio-economic and Livelihoods Impacts	Disruption of livelihoods activities by construction works	• Preparation of an Abbreviated Resettlement Action Plan • Consultations with affected groups or persons • Ensuring a functional Grievance Redress Mechanism	• ESSS MELR	**No Separate Cost** **(***Cost will be paid by the Government of Ghana)*
Disruption of Utility Services	Disconnection/disengagement of utility lines	• Coordinating with affected utility providers to disconnect or disengage the utility infrastructure	• Project Contractor	**No Separate Cost** *(Cost will be captured in the BOQ)*
Construction Phase				
Waste handling and disposal impacts	• Old asbestos roofing sheets	• Safe handling and disposal of asbestos roofing sheets measures (Details attached as Appendix 4)	• Project Contractor	**No Separate Cost** *(The cost of waste management and haulage will be captured in the BOQ)*
	• Construction waste	• Segregation of domestic waste • Giving out metal waste to accredited scrap dealers • Contracting the services of a registered waste management company to cart waste from the site	• Project Contractor	
	• Domestic waste	• Provision of coded waste bins • Segregation of waste • Contracting the services of a registered waste management company to cart waste from the site • Sensitisation of construction workers on good housekeeping practices, such as waste segregation		

	• Liquid waste – faecal matter and urine • Contaminates/hazardous waste	• Provision of mobile toilet facilities • Servicing of construction machinery and equipment offsite by a third-party contractor offsite		
Potential Vehicular Traffic and Accidents	• Haulage of construction materials/equipment and construction waste from the project site during peak hours • Over speeding and careless driving • Breakdown of haulage vehicles in transit obstructing traffic and causing accidents	• Drivers with a Valid Driving License D will be engaged • Haulage of construction material/equipment and construction waste will be done during off-peak hours or weekends, or holidays • Speed limits will be enforced • Mobile phone numbers will be posted on haulage trucks for the general public to report cases of reckless driving • Broken-down vehicles will be towed promptly	• Project Contractor	**No Separate Cost** *(Cost will be covered in the unit cost materials in the BOQ)*
Potential impacts from raw material sourcing	• Extraction of construction materials,	• Construction materials will be obtained from only EPA Certified Suppliers	• Project Contractor	**No Separate Cost** *(Cost will be covered in the unit cost materials in the BOQ)*
Loss of Vegetation Cover	• Felling of trees	• Seek approval from EPA/Department of Parks and Gardens Department for felling seven (7) trees • Replace seven (7) trees to be felled during clearing/construction with twenty-one (21) of the same species • Avoid excessive clearing (Only demarcated sites approved by the Project Consultant and marked trees by the EPA should be cleared)	• Project Contractor	**No Separate Cost** *(Cost will be covered in the unit cost materials in the BOQ)*
Potential Impacts on Air Quality	• Demolition activities • Stockpiling of demolished waste on site • Transportation (including and off-loading) of sand and other aggregates	• Dousing the sandcrete structure with water before demolition • Provision of PPE (nose masks and eye goggles) to workers • Undertaking demolition activities during weekends or holidays	• Project Contractor	**No Separate Cost** *(Cost will be captured in the BOQ)*

	• Adherence to a speed limit of (30km/hr) by drivers when moving on untarred roads along communities	• Carting of demolished waste from the site promptly • All trucks and other equipment will follow a planned maintenance regime, and records kept • Provision of nose masks to construction workers • Trucks hauling excavated spoil and fine aggregates construction materials will be covered with tarpaulin to prevent fly-offs • Haulage trucks will be required to reduce speed to 30km/h when approaching untarred roads.		
Public Occupational Health and Safety Risks	• Use of construction machinery and equipment • Exposure to chemicals • Unavailability of PPE • Poor enforcement of PPE usage • Poor housekeeping • Medically unfit workers	• Cordon off (hoard) the site and prevent unauthorised entry by employing private security • Provision of safety signages • All workers will undergo medical screening before they are employed • Supply and enforce the use of Personal Protective Equipment (PPE), such as hard hats, reflector jackets, and overalls for all workers and others such as nose masks, hand gloves and ear plug appropriate for specific tasks • Sanctioning workers who fail to use PPE • Employ a Health and Safety Officer • Scaffolding must be used for activities that will be above 2 metres • Scaffolding must be on a solid footing, not on boxes, loose bricks and stones, etc. • Provision of First Aid Kits on site • Training of workers to administer First Aid • Visitors to the construction site will be required to register in a logbook	• Project Contractor	**No Separate Cost** *(Cost will be captured in the BOQ)*

		• Visitors to the construction site will be provided with the appropriate PPE (safety gear, e.g., reflector vests, hard boots, and helmets) • Reverse alarms will be fixed on construction vehicles and other movable equipment.		
Noise and vibration impacts	• Demolition activities • Use of construction equipment • Movement of haulage trucks	• Major construction activities (e.g., demolition) which generate noise will be undertaken after 7pm or during weekends or holidays • Use of earplugs or earmuffs by workers operating or working close to heavy machinery such as excavators and compactors • Use of high-dexterity hand gloves when working with vibrating equipment • Operators of machinery and vehicles will be required to switch off idling engines • All trucks and other equipment will follow a maintenance regime, and records kept • Haulage of construction and waste material will be undertaken after 7pm	• Project Contractor	**No Separate Cost** *(Cost will be captured in the BOQ)*
Potential Fire Risks	• Cigarette butts, naked flames	• Acquisition of Fire Permit from GNFS • Post caution signs like 'No Smoking', 'Switch Engines' and 'Mobile Phones Off', 'Emergency Hotlines', etc., conspicuously in fire-sensitive areas. • Provision of firefighting equipment; • Construct concrete floor and bunded area for fuel storage to contain spills and prevent unauthorised entry; • Train construction workers as fire marshals to fight fire in the event of an outbreak; and • Conduct weekly toolbox meetings on fire safety.	• Project Contractor	**No Separate Cost** *(Cost will be captured in the BOQ)*
	• Ignition sources • LPG	• Post caution signs like 'No Smoking', 'Switch Engines' and 'Mobile Phones Off', 'Emergency	• Estate Manager	**No Separate Cost** *(The cost will be part*

	• Faulty electrical equipment	Hotlines', etc., conspicuously in fire-sensitive areas. • Install smoke detectors and heat alarms in various offices and facilities; • Provide firefighting equipment such as fire beaters, extinguishers, foam concentrates, hose reels, dry chemical powder, and CO_2 fire extinguishers at vantage points and generator plant areas, and various offices and facilities; • Restrict cooking and smoking to designated areas • Provide fire emergency exits and assembly points • Provide hydrants at strategic locations within the premises of the facility • Conduct annual firefighting drills and search-and-rescue operations to check the efficiency of emergency response and preparedness plans.		*of the annual budget of MELR)*
Risk of Potential Spills	• Transportation of chemicals • Unsecured containers	• Ensure that all hazardous substances and materials, such as thinners and paint, are stored in appropriate locations with impervious surfaces and adequate secondary containment. • Install oil traps on drains from storage areas and work zone; • Construction workers are to be provided with adequate training on the use, storage and handling of hazardous substances; • Place drip pans under small equipment and vehicles during servicing and routine maintenance to collect waste oils/fuel and lubricant for re-use or sell to other entities, e.g., chain saw and/or machine operators	• Project Contractor	**No Separate Cost** *(Cost will be captured in the BOQ)*

		• Undertake off-site repair and maintenance of haulage vehicles and large equipment • Portable spill containment and clean-up equipment are provided at appropriate locations on site, and training in the use of the equipment • Material Safety Data Sheets (MSDS) for each material in stock should be kept within the storage area where substances are stored and at the site office • Develop a procedure for managing the discovery of contamination, such as daily inspection of oil/fuel and lubricant storage areas and equipment; and • Where there is evidence of spillage and leakage, assess the activities carried out on-site and review the operational procedures in place. Modify these where appropriate.		
Potential poor working conditions	• Payment of salaries below the prevailing minimum wage • Poor working conditions	• Workers will be paid according to the prevailing national minimum wage • Work will commence at 8.00 am and close at 5.00 pm with a mandatory one-hour break • Workers will be provided with Contracts specifying the type of job they have been hired for and their working conditions (conditions of service) in line with The Labour Act, 2003 (Act 651) • Workers will be hired (employed) based on a structured system of hiring through a human resource officer/manager/agency	• Project Contractor	**No Separate Cost** (*Mitigation measures are part of operational activities and cost of the Project Contractor)*
Potential use of child labour on site	• Recruitment of minors	• Contractors will check the Birth Certificates and other identity cards of potential employees before being offered employment, and in the absence of a birth certificate and other identity cards, responsible persons/opinion leaders in	• Project Contractor	**No Separate Cost** (*Mitigation measures are part of operational activities*

		the applicant's community, e.g., religious leaders, Civil Servants will have to guarantee that they are above 18 years as part of the recruitment processes • A Code of Conduct prepared for the Project Contractor and Sub-Contractor employees will inform them that persons 18 years and below are not allowed on site and the sanctions for Child Labour.		*and cost of the Project Contractor)*
Incidence of Gender-Based Violence and Sexual Exploitation	• Site workers and residents of the project communities	• Contractual Clauses (see Appendix 5) on mandatory and regular training for workers on required lawful conduct and legal consequences for failure to comply with laws on non-discrimination and GBV; • Contractual Clauses with a commitment to cooperate with law enforcement agencies (DOVVSU) investigating cases of gender-based violence will be inserted into the Contract documents of the Contractor and Supervising Consultant • The Contractor will be required to consider alternative work schedules or shifts to accommodate the hiring of more female workers. • Contractual clauses against rape, defilement, and other Gender-based Violence, as well as child and forced labour, will be inserted into the contract of the Contractor and Supervising Consultant. These will be binding on all Sub Contractors and Third-Party Suppliers under the Project • Workers on site will sign the Code of Conduct (see Appendix 6) for sample Code of Conduct) with sanctions on rape defilement, abuse and other Gender-Based Violence related acts.	• Project Contractor	**No Separate Cost** (*Mitigation measures are part of operational activities and cost of the Project Contractor)*

		• Contact numbers of representative on the Grievance Redress Committee and GBV Service Providers will be pasted around the project site and within the immediate project zone. • Issues of Gender Based Violence will be discussed at the daily Toolbox meeting. • Prohibition posters on sexual exploitation and harassment will be posted on and around the site. • The Contractor will paste the contact numbers of the nearest DOVVSU/Police Station within the site and its environs. • Organize one sensitization session on GBV for site workers		
Risks of HIV/AIDS and STIs spread	• Causal sex between construction workers and petty traders and neighbouring community members	• Sensitization on HIV/AIDS and other STIs will be undertaken as part of the daily toolbox meeting. • Condoms will be provided for construction workers. • A Code of Conduct will be prepared for the employees of contractors and sub-contractors' employees to inform them of the sanctions for illicit sexual affairs and stigmatization of Persons Living HIV/AIDS	• Project Contractor	**No Separate Cost** (*Mitigation measures are part of operational activities and cost of the Project Contractor)*
Operational Phase				
Waste handling and disposal impacts	• Liquid waste	• Channelling of liquid waste generated into a centralised sewerage system	Estate Manager	**No Separate Cost** *(The cost will be part of the annual budget of MELR)*
	• Domestic waste	• Segregation of domestic waste bins at vantage locations • Provision of coded waste bins		

		• Sensitisation of construction workers on good housekeeping practices, such as waste segregation		
	• Electronic waste	• Contracting a EPA certified special waste management company to dispose of WEEE		
Potential Impacts on Air Quality	• Exhaust fumes from the generator set	• Regular services of generator set	Estate Manager	**No Separate Cost** *(The cost will be part of the annual budget of MELR)*
Potential Fire Risks	• Ignition sources • LPG • Faulty electrical equipment	• Post caution signs like 'No Smoking', 'Switch Engines' and 'Mobile Phones Off', 'Emergency Hotlines', etc., conspicuously in fire-sensitive areas. • Install smoke detectors and heat alarms in various offices and facilities; • Provide firefighting equipment such as fire beaters, extinguishers, foam concentrates, hose reels, dry chemical powder, and CO_2 fire extinguishers at vantage points and generator plant areas, and various offices and facilities; • Restrict cooking and smoking to designated areas • Provide fire emergency exits and assembly points • Provide hydrants at strategic locations within the premises of the facility • Conduct annual firefighting drills and search-and-rescue operations to check the efficiency of emergency response and preparedness plans.	Estate Manager	**No Separate Cost** *(The cost will be part of the annual budget of MELR)*

8.0 ENVIRONMENTAL AND SOCIAL MONITORING PLAN

8.1 Introduction

Monitoring would be a key component of the ESMP during project implementation. The aim of monitoring would be to:

- Improve environmental and social management practices;
- Check the efficiency and quality of the management processes;
- Monitor the effectiveness of the mitigation and enhancement measures;
- Establish the scientific reliability and credibility of the mitigation measures;
- Determine long-term and residual effects;
- Provide the opportunity to report the results on safeguards and impacts and propose mitigation measures to improve E&S performance; and
- Identify project-specific cumulative environmental and social effects, if applicable.

The MELR PIU Environmental and Social Safeguards Specialist will oversee environmental and social monitoring and reporting under the Project. He will report to the Environmental and Social Safeguards Specialist at the GJSP at the PCU. The World Bank may also undertake project inspection/monitoring during project implementation support missions to ensure compliance with the applicable safeguards policies and recommend areas requiring capacity strengthening.

The monitoring roles are presented in Table 8.1.

Table 8. 1 Environmental and Social Monitoring Plan

S/n	Potential Environmental and Social Impacts	Monitoring Parameters	Monitoring Site	Frequency	Responsibility for Monitoring	Cost Estimate (USD)
Pre-construction Phase						
1.	Socio-economic and Livelihoods Impacts	• Records of PAPs consultations • Number of PAPs displaced • Resettlement package given • Complaints by PAPs	• Construction site's immediate environs	Weekly	• MELR Environmental and Social Safeguards Specialist	**No Separate Cost** (Part of MELR ESSS functions under the Project.
2.	Potential disruption of utility services	• Records of engagements with affected utility service providers	• Project Corridor	Weekly	• MELR Environmental and Social Safeguards Specialist	**No Separate Cost** (Part of MELR ESSS functions under the Project.
Construction Phase						
1.	Generation of construction waste	• Inspect records of participants of orientation meetings • Conduct impromptu checks on workers' use of PPE; caution or penalize non-conforming workers • Inspect temporary storage sites for asbestos daily to verify the integrity of the cordoning • Records of quantities of asbestos sheets removed and demolished waste generated from the site and disposed of at the landfill site, respectively • Number of coded bins provided at the site • Number of mobile toilets provided and the hygienic state of the facility • Complaints by the general public	• Construction site immediate environs and landfill site	Weekly	• MELR Environmental and Social Safeguards Specialist	**No Separate Cost** (Part of MELR ESSS functions under the Project)

		• Records of machinery and equipment servicing by third-party contractors				
2.	Potential Vehicular Traffic and Accidents	• Validity of driving license presented by drivers or otherwise • Inspection of vehicle logbooks • Complaints by the general public • Accident cases recorded • Complaints by the public	• Haulage routes	Weekly	• MELR Environmental and Social Safeguards Specialist	**No Separate Cost** (Part of MELR ESSS functions under the Project.
3.	Potential impacts from raw material sourcing	• Inspection of permits of suppliers	• Raw materials source (s)	Monthly	• MELR Environmental and Social Safeguards Specialist	**No Separate Cost** (Part of MELR ESSS functions under the Project
4.	Loss of Vegetation Cover	• Number of trees felled and replanted	• Construction site	Monthly	• MELR Environmental and Social Safeguards Specialist	**No Separate Cost** (Part of MELR ESSS functions under the Project
5.	Potential Impacts on Air Quality	• Records of demolition activities schedule • Records of water dousing • Impromptu checks on the use of PPE • Site inspection • Records of maintenance activities • Records on the use of tarpaulins • Complains by communities along the haulage routes •	• Construction site	Monthly	• MELR Environmental and Social Safeguards Specialist	**No Separate Cost** (Part of MELR ESSS functions under the Project
6.	Occupational Health and Safety Risks	• Inspection of the visibility of safety signage • Records of medical records • Number of workers sanctioned	• Construction site	Weekly	• MELR Environmental and Social Safeguards Specialist	**No Separate Cost** (Part of MELR ESSS functions under the Project

		• Inspection of the integrity of scaffolding • Inspection of stock of First Aid Kits • Records of First Aid Training Attendance • Records of injuries • Inspection of the functionality of reverse alarms				
7.	Noise and vibration impacts	• Impromptu checks on the use of PPE • Impromptu checks of the operations of machines and equipment • Records of trucks and equipment maintenance • Records logbook of haulage vehicles • Number of complaints by community members	• Construction site	Monthly	• MELR Environmental and Social Safeguards Specialist	**No Separate Cost** (Part of MELR ESSS functions under the Project
8.	Potential Fire Risks	• Validity of Fire Permit • Conspicuousness of signages • Stock of firefighting equipment	• Construction site	Weekly	• MELR Environmental and Social Safeguards Specialist	**No Separate Cost** (Part of MELR ESSS functions under the Project
9.	Risk of Potential Spills	• Complains by community members along the haulage route Site inspection to check on storage	• Construction site • Haulage route • Construction site	Weekly	• MELR Environmental and Social Safeguards Specialist	**No Separate Cost** (Part of MELR ESSS functions under the Project.
10.	Potential poor working conditions	• Inspection of workers' pay sips and contracts • Complaints by the workers	• Construction site	Monthly	• MELR Environmental and Social Safeguards Specialist	**No Separate Cost** (Part of MELR ESSS functions under the Project
11.	Potential use of child labour	• Number of persons aged 18 years or below working on sites	• Construction site	• Daily	• MELR Environmental and Social Safeguards Specialist	**No Separate Cost** (Part of MELR ESSS functions under the Project

12.	Incidence of Gender-Based Violence and Sexual Exploitation	• Number and type of GBV cases reported • Status of cases reported • Presence of focal persons/points within the community to receive GBV cases or otherwise	• On the Project Site /Project Communities	• Monthly	• MELR Environmental and Social Safeguards Specialist	**No Separate Cost** (Part of MELR ESSS functions under the Project
13.	HIV/AIDS and STI spread	• Number of condoms distributed to workers • Number of sensitisation campaigns organised for site workers • Number of condoms distributed to Contractors' staff working in each site in a month	• Project Beneficiary Communities	• Monthly	• MELR Environmental and Social Safeguards Specialist	**No Separate Cost** (Part of MELR ESSS functions under the Project
Operational Phase						
1.	Waste Management	• Records of domestic waste generated • Number of waste bins provided • Permits of waste management companies	• Project Facility	Monthly	• Labour Department Facility Manager	**No Separate Cost** Labour Department Annual Budget
2.	Potential Impacts on Air Quality	• Records of generator set servicing	Project Facility	Quarterly	• MELR Environmental and Social Safeguards Specialist	**No Separate Cost** Labour Department Annual Budget
3.	Potential fire risks	• Conspicuousness of signages • Functionality of smoke detectors and heat alarms • Number of firefighting equipment • Expiry dates of firefighting equipment • Accessibility of emergency exits and assembly points • Availability of water in hydrants • Records of fire drills	Project Facility	Weekly	• MELR Environmental and Social Safeguards Specialist	**No Separate Cost** Labour Department Annual Budget

9.0 ESMP REPORTING

9.1 Introduction

As part of monitoring the ESMP, it is expected that Project Consultants will prepare a stand-alone environmental and social monitoring report as part of their monthly progress and quarterly report to present the state of the environmental and social safeguards on the project.

The report shall include but is limited to:

- Contractors' performance in implementing environmental and social mitigation measures in the ESMP;
- Progress on mitigation measures in relation to identified environmental and social impacts/risks;
- Emerging environmental and social impacts/risks and proposed mitigation measures (if encountered);
- A presentation on parameters monitored in the reporting month;
- Activities to be taken in the next month; and
- Capacity building needs (if required)

All accidents should be reported to the MELR's Environmental and Social Safeguards Specialist within 24 hours.

9.2 Institutional Arrangements and Responsibilities

The institutional arrangement identifies the relevant institutions and actors involved with the implementation of the ESMP, their roles and responsibilities. The main institutions or actors concerned with the implementation of the Project and the ESMP related activities are provided in Table 9.1. The ESMP implementation activities will be under the overall guidance of the MoF PCU Environmental and Social Safeguards Specialist.

Table 9. 1 Roles and Responsibilities of Key Actors

Key Actors / Institutions	Description of Key Roles/Responsibilities
MELR/ PIU Environmental and Social Safeguards Specialist	• Insertion of the environmental and social clauses in the construction and supervision contracts • Undertake environmental and social monitoring during the construction phase works to ensure compliance with WB's operational safeguards policies and conditions of the environmental permit. • Undertake environmental and social reporting during the construction phase based on the agreed template/frequency/mechanism with WB • Training of Works Contractors on requirements of the ESMP, Environmental and Social Clauses and Code of Conduct as well as Grievance Redress Mechanisms • Grievance Redress
MoF/ PCU Environmental and Social Safeguards Specialist	• Overall coordination of Environmental and Social Safeguards in the Implementation of the Project • Grievance Redress
EPA	• Issuing of an environmental permit upon review and approval ESMP • Ad-hoc monitoring of the sub-project to ensure compliance with the conditions of the Environmental Permit.
Korle Klottey Municipal Assembly (Municipal/Metropolitan Works Engineers, Environmental Health, Social Welfare Officers,)	• Ad-hoc monitoring of the project during the construction phase • Grievance Redress
Project Consultant including Project Contractor/Engineer (Supervising Engineer) and Safeguards Specialist	• Project Environmental and social monitoring and reporting (monthly progress report/quarterly report) • Stakeholder engagements • Ensures that project execution meets specified environmental, social, health and safety guidelines contained in the contract documents and ESMP. • Ensure environmental and social mitigation measures proffered by the EPA/GJSP/WB/MELR/MMDA and other stakeholders, in these site instructions are carried out by Contractors • Grievance Redress
Contractors	• Contractors are responsible for the implementation of the construction phase mitigation measure provided in the ESMP • Responsible for the presentation of monthly monitoring reports to MELR PIU • Grievance Redress
GRC	• To receive and find solutions to grievances

9.3 Estimated Cost of the ESMP

The estimated cost (Table 9.2) for implementing this ESMP outside the works contract price is sixteen thousand five hundred American Dollars (**UDS16,500.00**). The Ministry of Employment and Labour Relations is responsible for providing this amount to implement the ESMP.

Table 9. 2 Budget for ESMP Implementation

S/n	Programme	Cost/year (UDS)
1.	Grievance Redress	15,000.000
2.	**Total**	**15,000.00**
3.	Contingency (10% of Total)	1,500.00
Grand Total		**16,500.00**

10.0 GRIEVANCE REDRESS MECHANISM

The GRM is a fundamental requirement of the Stakeholder Engagement Plan prescribed by the World Bank's Environmental and Socials Safeguards Policy. The overall objective of the GRM is to provide an effective, transparent and timely system that will give employees or aggrieved persons redress and avoid litigation, minimise bad publicity, avoid/minimizes delays in the execution of infrastructural works, and ensure public health, safety, and sustainability during project implementation.

As a project-wide GRM already exists, it will be reviewed and modified to cover the Redevelopment of the Labour Department Project-related activities. When required, additional measures, including introducing any other initiatives that could complement the effectiveness of the process, will be adopted. The principles informing the mechanism that will be set up are trust, voice, transparency, mutual respect and equity. It will also be done from a gender perspective to ensure both men and women aggrieved can participate and use the system effectively. The GRM would provide all persons (public and employees) and groups affected during site construction activities the avenues to express their concerns and receive corrective action appropriately and promptly. Reported Sexual Exploitation and Abuse (SEA) or Sexual Harassment (SH) cases will be treated with confidentiality. Culprits of SEA/SH acts will be sanctioned accordingly, including reporting such cases to the Domestic Violence and Victims Support Unit (DOVVSU) of the Ghana Police Service for the necessary action. A project Sexual Exploitation and Abuse and Sexual Harassment Prevention and Response Action Plan is being developed to prevent GBV-related abuses.

A Call Centre (with toll-free numbers 0800-600-300 and 0800-600-400) and an online portal (https:grs.softdeets.com) have been made available for the general public to register any complaints or inquiries on activities related to the various component of the GJSP. A project signpost with the online portal address e-mail address and toll-free numbers for lodging complaints will be posted within the project's area of influence. Individuals and communities who believe they are adversely affected could also submit complaints directly to the World Bank's Grievance Redress Service (GRS).

10.1 Grievance Redress Process for Project Workers

The Grievance Mechanism for all Project Workers is as follows:

- Contractors and or representatives will be the point of contact for all Grievances. The contractor will designate a staff member who will be responsible for receiving grievances;
- Upon receipt of Grievances, the contractor staff/representative will notify the Environmental and Social Safeguards of MELR PIU. Grievances will be registered in a registry of complaints;
- The contractor will attempt to address the grievance within the established time frame of 15 business days upon receipt. In timely or urgent matters, a minimum period of 24 hours and a maximum of 15 business days will be allotted for resolving the grievance.
- Grievances can be made in person, online, by telephone call or by writing;
- If the contractor cannot resolve the grievance, the contractor will inform the ESSS of MELR;
- The ESSS of MELR will meet with the project contractor and workers and attempt a resolution;
- If issues cannot be resolved, the case will be referred to the PCU of GJSP at the Ministry of Finance for their action and pronouncement;
- The PCU's ruling would be the final tier of the grievance mechanism;
- If unresolved, either party may seek redress in the courts of the Country; and
- Information about the GRM will be disseminated to workers through signs at the project work site, brochures and handbills at the project website and SMS messages sent to the workers' phones.

10.2 Grievance Redress Process for PAPS and the General Public

The process of resolving grievances will comprise the following tiers:

1. A Five-Member Grievance Redress Committee;
2. PCU/PIU Grievance Redress Oversight Committee; and
3. The Law Court.

10.2.1 Five-Member Grievance Redress Committee

The five-member GRM committee will consist of the following:

- Assembly Member for the Electoral Area where the sub-project is situated;
- Three representatives of PAPs;
- Representative of the Labour Department;

- A representative of the Ministry of Employment and Labour Relations; and
- A representative of the Department of Social Welfare and Community Development of KoKMA.

The Five-Member Grievance Redress Committee will be the first point of contact between the project and the public. Their role/mandate will include providing project information to stakeholders and resolving minor grievances. The first-tier GRM Committee will resolve the issue within fourteen (14) business days from receipt. The second tier is activated if a grievance submitted to this group does not receive a satisfactory resolution.

10.2.2 PCU/PIU Grievance Redress Oversight Committee

The second tier GRM Committee is the PCU/PIU Grievance Redress Oversight Committee. Their composition will consist of the following:

- Project Coordinator – PCU (MoF);
- Project Coordinator – PIU (MELR);
- ESSS of PCU (MoF);
- ESSS of PIU (MELR);
- Director of PPME (MELR); and
- A representative from the Ministry of Finance.

The PCU/PIU Grievance Redress Oversight Committee takes up grievances refereed by the first tier Five Member Grievance Redress Committee. The PCU/PIU Grievance Redress Oversight Committee will monitor the activities of the First-Tier GRM and ensure complaints and grievances lodged are resolved amicably. However, suppose a complainant is not satisfied with the decision of the First-Tier GRM. In that case, the person can bring it to the attention of the PCU/PIU Grievance Redress Oversight Committee. The Second-Tier GRM will resolve the issue within twenty-one business days from the date of receipt.

10.2.3 Law Court

If the complainant remains dissatisfied with the mediation effort of the PCU/PIU Grievance Redress Oversight Committee, the complainant can pursue the appropriate recourse via the judicial process in Ghana. The Constitution allows any aggrieved person access to the Court of

Law. However, the project will do all it can to use the alternative dispute arrangements provided under this GRM to reach an amicable settlement with a complainant.

Table 10.1 shows the timelines for addressing grievances at every tier, and Figure 9.1 shows a flowchart for the grievance redress process.

Table 10. 1 Timelines for Responding to Grievances

S/n	Process	Timelines
1.	Five-Member Grievance Redress Committee	Within fourteen business days
2.	PCU/PIU Grievance Redress Oversight Committee	Within twenty-one business days
3.	Court of law	Unknown

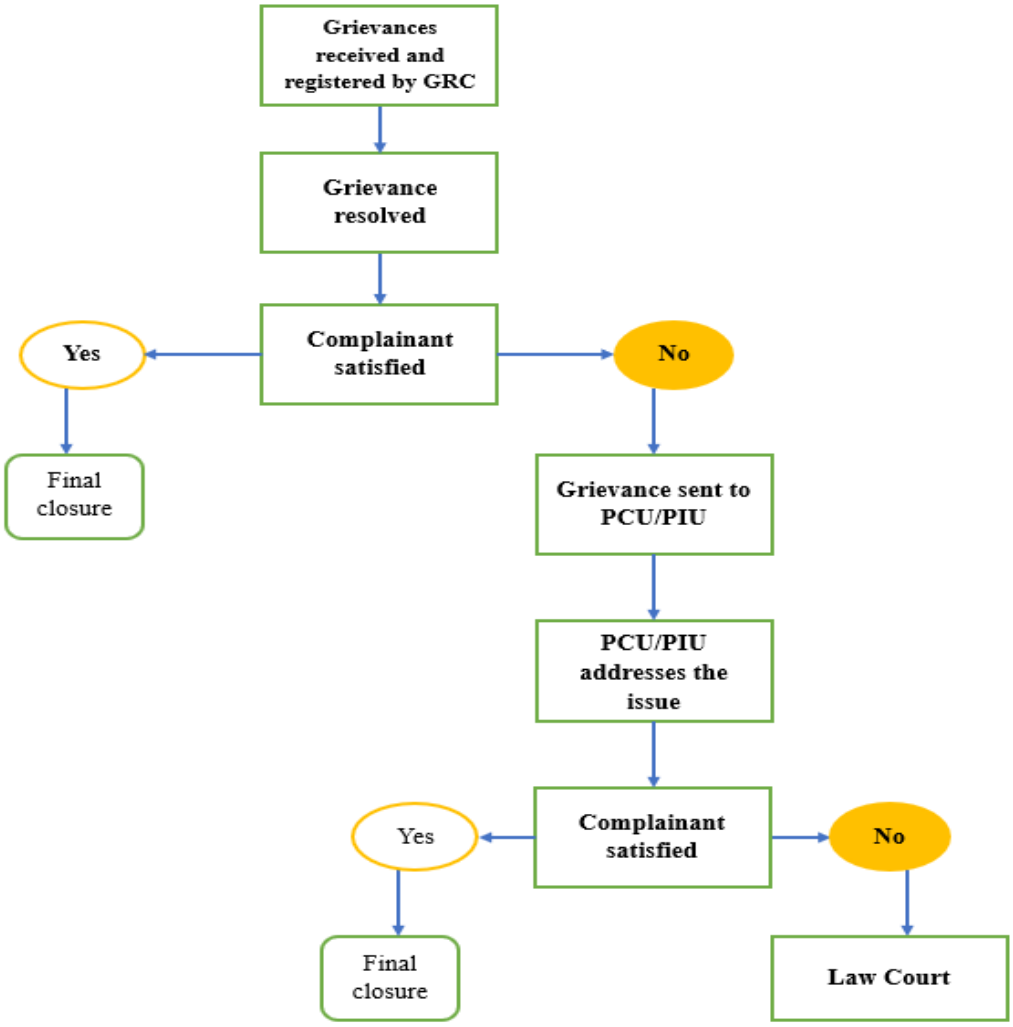

Figure 10. 1 Grievance Redress Processes

The PIU ESSS will monitor the following data or parameters during the implementation of the GRM :

- Records of PAPs consultations;
- Resettlement package given to PAPs;
- Compliance with business standards;
- Numbers of grievances/feedback received, disaggregated by gender;
- Issues raised in grievances/feedback;
- Trends in grievances/feedback over time;
- The causes of grievances/feedback; and
- Recommendations/strategies to prevent or limit future recurrences.

The PIU will compile the above data monitored and submit them in a monthly report to the PCU in a gender disaggregated format. The PCU will submit a project wide GRM monitoring report to the World Bank quarterly.

11.0 EMERGENCY RESPONSE PROCEDURES

11.1 Medical/Accident

In the event of an accident or injury, the procedures to be followed:

- If it is a minor accident/injury and the victim can move, he/she should report to the Contractor's EHS Officer;
- The Contractor's EHS Officer Environment, Health and Safety Officer, who is trained in administering first aid, will treat the injury;
- He/She will decide if the victim needs further treatment at the Medical Centre and, if so will arrange for the victim(s) to be sent to the nearest health facility immediately;
- The EHS Officer will investigate and take records of the accident/injury, including the source and cause of the accident/injury;
- All accidents and injuries will be recorded by the Contractor's EHS Officer.

11.2 Emergency Response Procedures for Wastewater Spill/Leaking or Blocked Sewer Main

Emergency response strategies for each of these situations are presented below:

- Stop using the system
- Estimate the quantity of sewage spilt.
- Determine the level of emergency through visual inspection
- Contain the spill using a bank of soil
- Scoop up the contaminated soil, if the spill is minor
- For broken sewer main: if possible, isolate the sewer line to stop, contain or minimize the spill, or divert the spill to low-risk areas or into an emergency septic/holding tank
- Call/Report the incident to AMSU for remedial action

11.3 Malfunctioning System:

- Shut down and if possible, locate the system components that are malfunctioning;
- Call AMSU for repair service and/or to order replacement parts

12.0 CONCLUSION

The Project Implementation Unit of MELR is committed to ensuring sustainable environmental management and safeguarding the health and safety of the construction workers, project communities and the general public during the implementation of the proposed project. Furthermore, the ESMP revealed that the anticipated negative impacts would be short-term, site-specific, confined, and reversible and can be managed by applying mitigation and monitoring measures, while beneficial impacts can be readily enhanced.

The recommendations outlined in the ESMP for the project will ensure a high level of health, safety and environmental management for the proposed project. Therefore, increase the environmental and social soundness of the programme in line with both applicable national and World Bank's environmental policies, legislations and procedures.

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Appendices

Appendix 1

Engagement Outcomes

Appendix 1.1 EPA

Discussions
1. Measures to Consider Before Demolishing Structures • Pick an EA form from and indicate the intention of demolishing the old structure. • A PER will be done to check how the demolishing debris will be handled.
2. Major Issues that Evolve Demolition and Reconstruction • The major issues that evolve in demolition and reconstruction is the waste and dust that will be generated since the site is an operational site with workers around. • Construction debris should either be reused, recycled or sold to scrap dealers. • A geotechnical investigation should be done to check whether the land have the capacity to hold a four-storey building. • Heavy-duty vehicles bringing in materials should be managed to avoid traffic. • Demolition and construction should take place in the evening or during weekends or holidays since the construction site is in a ministerial enclave, and the noise produced may end up causing disturbances to workers. • Crushed concrete can be sold or used as backfill and top fill during the reconstruction. • The construction site should be hoarded to provide safety, security, and protection for the public and construction employees.

Appendix 1.2 Ghana National Fire Service

Date:	**Time:**
Participant:	**Consultant:**
Discussions	
1. Measures to Put in Place During the Demolition and Reconstruction • The construction site should be cordoned off to prevent outsiders from getting access to the site • The constructors and other employees should always be in their PPEs • The power supply should be disconnected before demolition and reconstruction commences	
2. Permitting Obligation to be Satisfied Under this Project • GNFS has no obligation in the demolition of the old structure. • Fire permit should be applied for the construction of the building. • GNFS will have to look at the building plan to approve where the exit door should be located, how many exit doors the building should have and the type of door appropriate for the structure before issuing the fire permit	
3. Frequency of Fire Outbreaks within the District Fire outbreak is rampant in the jurisdiction during the dry season.	

4. Causes of Fire Outbreak in the Ministerial Enclave

- Air condition is one of the electrical appliances that causes fire in the ministerial enclave. Air conditions are mostly left to stand for 24 hours
- Kettles used on top of microwaves
- Overloaded fire extensions

5. Fire Prevention Strategies to be Incorporated into the Building Plan

- The building should have an emergency door.
- There should be a lot of ventilation in the building design
- Heat extractors and smoke detectors can used in the building but should be excluded from the kitchen or canteen.
- Smoke detectors should place in line with the air condition
- There should be enough doors in the building since it is a commercial place.

6. Role of GNFS During the Construction and Occupancy Phases

- There should be enough room for people to move freely in a room.
- GNFS will tell the number of people to occupy a room after evaluating the building drawings.
- A big room (12 by 12) can have two desk.
- A single room (10 by 12) should not take more than 5 people.

7. Nearest Fire Station to the Project Site and Accessibility

- The ministries fire service is the closest fire station to the project site.
- The next closest fire station is located at the parliament house.
- It has one fire tender but in case of an emergency, tenders and water tankers can be brought from other stations to douse the fire.

1.3 Ghana Police Service

Discussions

1. Security Situation

- Crime rate is not rampant in the ministerial enclave. Crimes normally reported in the enclave include petty theft, break-in, etc. Crimes of this nature are normally perpetrated by the workers in the offices.
- Major crimes such as murder, robbery, carjacking, rape etc., are not normally recorded in the enclave.
- The jurisdiction of Accra Central Division extends from Stadium, Parliament House, Liberation Circle, part of Ridge Hospital, Graphic Road, Graphic Agbogbloshie, CMB, Jamestown and Highstreet.
- Major crimes are normally recorded around Tudu, Agbogbloshie, Art Center, Jamestown, Graphic Road, Accra Central and High Street.
- These areas are the locus for hinterlands due to the population density around these areas being very high.
- Tema station and Art Center, which are very close to the project, are known for their night activities; if there is to be any kind of theft or thievery, it may come from these areas since they are the closest to the project site.

2. Closest Police Station

Accra Central Division

3. Traffic Situation in the Enclave

Fire outbreak is rampant in the jurisdiction during the dry season.

4. Measures to Prevent Accidents

- Traffic situation in the ministerial enclave normally flows but during the transmission of machinery for the demolition and reconstruction of the labour department, it could create traffic congestion in the enclave.
- It is necessary to get an escort for vehicles transporting goods to prevent traffic congestion in the enclave.
- The Ghana police service can be notified to help clear the way for transport vehicles to pass.
- Escort firm can also get permit from AMA to assist with the clearing of the road.
- The police should be notified in the case of any road block that may occur during the transportation process.

5. Measures to Enhance Security

The project area is normally quiet after working hours. The area becomes desolate with no human activities ongoing. This type of surrounding normally attract thieves and buglers. It is essential to get 24 hours security to stand on guard when the project commences since equipment and other important machinery will be kept in the premises. The construction site should also be cordoned off to prevent people from getting access to the site.

6. Prevalence of GBV

- The ministerial enclave hardly records cases of GBV. This situation is different from the surrounding communities.
- Sexual exploitation abounds in communities like Agbogbloshie, Bukom, Jamestown, Art center and Tema station. There are brothels, motels and hotels in every area.
- Since these areas are the hub for various head potters, truck pushers and others, crimes such as rape, murder, robbery etc., are always recorded in these communities.

7. Rate of Streetism in the Enclave

The rate of streetism in the enclave is relatively high, especially around the Afua Sutherland Park. The area has turned into the abode for criminals. These criminals engage in various crimes, such as pickpocketing, informants for robbers among others.

8. Measures to Handle GBV

The ideal to do if GBV occurs is to report to the police station. The Accra Central Division police houses the Domestic Violence and Victim Support Unit, so it easier to deal with such cases.

9. Prevalence of Child Labour

Child labour is very prevalent in the ministerial enclave. Children from all walks of life move to stay in the surrounding areas to do petty business. Those who do not get anyone to shelter them have to live on the street as street children doing petty jobs and sometimes committing petty crimes.

10. Type of Work Involving Child Labour

- Cleaning of windscreens
- Washing dishes for restaurants
- Hawking on the street

- Begging

11. Local Source of Labour and Raw Materials for Construction

- It is not advisable to source the raw materials for the construction locally.
- People that surround the ministerial enclave engage in various kind of crimes.
- If raw materials and workers for the construction are sourced locally, it is easier for them to link with criminals to the rob the construction materials.

12. Minors Seeking for Employment

It is possible for minors to avail themselves for employment during the constructions. Constructors should be educated on the consequences of employing minors to work on construction site. Also, the Ghana identification card of all workers should be inspected to ascertain whether an employee is a minor or not.

1.4 Labour Department

Discussions

1. History of the Labour Department

The labour department started in Kumasi before moving to Accra.

2. Challenges with the Old Labour Department Structure

- It is not disability friendly
- The structure has no washroom for visiting clients.
- Some of the roofing is removed, and others have caved in
- Potholes in the floor
- Spilling sewage system
- Reception is small
- The conference room is not in the right state to hold meetings
- Faulty and hanging wires
- Doors to provide security are removed
- The library is abandoned
- The Internet connection is not functioning
- Washrooms are in a bad state. The construction site should be hoarded to provide security to provide safety, security, and protection for the public and construction employees

3. Benefits of the New Structure

- The new structure will enhance the image of the department
- The GLMIS will provide a comprehensive employment register for the department. This will, in turn, help;
  - Provide a portal for jobseekers
  - Help job seekers successfully apply for job vacancies from the comfort of their homes
  - Employers to advertise the vacancies in the companies
- Through the GLMIS, the department can get statistics to help with policymaking.

1.5 Traders at the Labour Department

Discussions
Participant: Christiana Ifeoma - Petty trader (fruits)
The work experience with the department is about 38 years. Trading in fruits is the only livelihood source that caters to five dependants as single mother. Lives on the premises and will like to be temporarily relocated till construction is completed.
Participant: Teni Agomyah - Squatter
Lives on the premises of the Labour Department. Left her home due to her inability to pay rent and sell water on the street. Divorced with four dependents who live in Kumasi.
Participant: Elizabeth Amoah - Petty trader (fruits)
The work experience with the department is about 6 months. Earns around 200 cedis as profit each day with one dependent. As compensation, the provision of a stall to set up a business would be ideal.
Participant: John Asem- Petty trader (Coconut)
Has been working on the premises for about a year. Earns 200 cedis as profit, having one dependant, would like to be compensated.
Participant: Linda Darko- Petty trader (Mushroom and tomato)
Has been working on the premises for 10 years. Earns 200 cedis as profit each day. A single mother has four dependents, and would need a place to start a business.
Participant: Martha Ntoo- Petty trader (Mushroom)
Has been working on the premises for 10 years. Earns 300 cedis as profit. Single mother with 3 dependants. Would want a place to start business.
Participant: Augustina Nsom- Petty trader (Water, Soft drinks, fruits)
Has been working on the premises for 7 years. Earns 25 cedis as profit daily. Single mother with three dependents. Would like to be compensated or relocated.
Participant: Florence Acquah- Petty trader (fruits)
Has been working on the premises for 11 years. Earns a profit of 100 cedis daily. Has 3 dependents. Would want a place to relocate for business.
Participant: Joyce Yeboah- Petty trader (Water, Soft drinks)
Has been working on the premises for 8 years. Earns 50 cedis as profit daily. Married with 3 dependents. Would want a place to relocate the business.
Participant: Juliana Lomokie TeyePetty trader (Food)
Has been working on the premises for 3 years. Has three workers. Earns about 400 cedis as profit everyday. Has 2 dependents. Would want a place to relocate to.
Participant: Doris Asantewaa - Petty trader (Foodstuff)
Has been working on the premises for 30 years. Earns 100 cedis as profit daily. Has 7 dependents.
Participant: Margaret Tetteh- Petty trader (Food)
Has been working on the premises for 8 years. Earns a daily profit of 100 cedis. Has 7 dependents
Participant: Dorcas Ntow - Petty trader (tomato)

Has been working on the premises for 7 years. Has five dependents. Earns a daily profit of 200 cedis.

Appendix 1.6 Ghana Water Company Limited

Date:	**Time:**
Participant: Abdul Fatawu Tambro - Environmental and Safeguard Specialist – GWCL Headquarters	**Consultant:**

Discussions

1. Water Supply Situation

- Ghana water company mostly have their pipes lines laid along roads. Due to that, during demolition and reconstruction, utility lines should be located to prevent disruptions.
- Different pipelines come together to transport water to a user's location.
  - The main pipe lines that transport water from the treatment plants (Weija) to town are known as transmission lines.
  - Distribution lines draw water from the transmission pipes to different areas.
  - Service lines draw water from distribution lines and transmit it to a location.
- The impact of demolition and reconstruction mostly falls on the service line. Due to that, service lines are to be located and disconnected before demolishing the existing structure.
- Ghana Water has certified plumbers responsible for the disconnection of service lines. Each area has a Ghana water district it falls under. Hence, when the District Office is notified, a certified plumber will be sent or recommended to disconnect the service lines.

2. Source of Water for the Ministerial Enclave

The three treatment plants serve Accra's water, Weija, the desalination plant in Teshie and Kpong. Water distributed to Accra is mainly transmitted from Weija, but if there is much water coming from Kpong and little water coming from Weija, water is pumped from Kpong and distributed to Accra.

3. Water Shortage

The water supply in the entire Accra is intermittent. Those closer to the water treatment centre get the initial pressure, while it takes time for those further away from the treatment plant to access water.

4. Four-Storey Building Affecting Water Supply

The demand for water supply will increase in the labour department due to the additional facilities that will be added after the reconstruction. There will be a higher water demand compared to the old structure in the new structure.

Appendix 1.7 Korle Klottey Municipal Assembly

1. Environmental Health and Sanitation Department

Discussions

1. Dump Site for Construction Waste

- The municipality does not have a designated site for construction waste. The project implementers are responsible for finding a suitable site to dump construction debris.
- The concrete from the demolition can be used as a fill-in for places where sand winning or quarry has taken place.

- The concrete should be broken down into fine grains before being used as a fill-in since it cannot compact in boulders.
- The concrete can be taken to places such as Amasaman and the Kpone Katamaso planes since they have artificial depressions.
- The construction and demolition debris can be taken to the Adepa waste management centre at Nsawam because they have a cell for C&D waste.

2. Handling and Disposal of Asbestos Waste

- Asbestos has been banned in many countries due to its hazardous nature; most landfills do not take asbestos waste.
- Constructors should be extra careful when removing asbestos.
- The removal of the asbestos should be done manually, without the use of machines, since the machine will break it and produce dust which will pollute the air.
- Adipa management waste centre does not have cells for asbestos waste, but if they know the quantity of asbestos being removed, they can create a special cell for it to be disposed of.
- Accidental breakages may occur during the removal of the asbestos, the asbestos should be removed at a time when the operation is less around the enclave, that is, during holidays or weekends.
- The construction site should be hoarded to prevent people from gaining access to the construction site.
- During the demolition and construction, public safety should be ensured, and pollution in relation to air, water and noise should be avoided or properly mitigated.
- The exhaust emissions from heavy-duty vehicles and machinery should be controlled so that it doesn't end up polluting the air.
- Contractors should have Personal protective equipment (PPEs) to minimize their exposure to varieties of hazards

3. State of Sewerage Network in the Area

- Extensive work has been done on the central sewage within Accra.
- The central sewage covers the whole ministerial enclave including the construction site.
- Service lines such as pipe lines and communication lines should be contacted so that contractors can access the maps to locate the service lines.
- When any of these service lines are broken, they should be fixed immediately.

4. Sensitive Areas

- The Klottey Lagoon, which belongs to the municipality and the Odaw River are sensitive sites.
- The Klottey Lagoon has a lot of siltation as a result of the action of the sea, and this situation is affecting the adjourning communities. Wastewater is discharged into the lagoon without being treated. Due to this, the lagoon is dead and has no aquatic habitat.
- Demolition debris should have a shorter clearing period. He added that the demolition should be done in stages so that the waste from each stage is cleared before moving on to the next stage.

5. Waste Management Companies in the Municipality

The municipality has one waste management company, that is Jekora Ventures. Jakora does door-to-door or private collections. They also do public cleaning. Zoomlion provides a public service known as the Sanitation Improvement Package (SIP). They do not engage in a private collection.
6. Details of Waste Management Companies • Mr. Peter Dagadu (Adipa waste management) – 0249804049 • Abdul Rahman (Capito) (Electronic waste) – 0242267353

2. Physical Planning and Development Department

Discussions
1. Permits Demolition permit to pull down the existing structure and Building permit to reconstruct the new structure.
2. Documents Needed to Apply for a Demolition Permit • Land title certificate • Architectural drawing of an old structure • Pictures of the existing structure • Property rate receipt • Demolition plan • Waste management plan (including how noise and air pollution are to be mitigated) • The municipal physical planner and municipal engineer is to be notified 48 hours before the execution of the permit. The assembly will visit the site for inspection before the demolition day. • When demolition is completed, the assembly is to be notified to visit the site to inspect whether everything is going on according to the waste management plan.
3. Documents Needed to Apply for Construction Permit • Indenture • Architectural drawings • Structural drawings • Electrical drawings • Plumbing works • Fire permit • Geotechnical report • Structural design • Environmental permit • Traffic impact assessment • Waste management plan.
4. Role of the Assembly after Building Permit is Issued • The assembly is to be notified a week before construction commences; for the assembly to visit the site before construction commences. • The assembly will visit the construction site for a stage-to-stage inspection, that is, at the substructure, superstructure and roofing.

5. Zoning Status of Project Area

Civic and cultural

6. Site for Dumping Construction Waste

- It is the duty of the project manager to find sites where construction sites can be dumped.
- There is a transfer site in Adabraka and Osu.

3 Social Welfare and Community Development Department

Discussions

1. Prevalence of GBV

Cases of Gender-based violence and social exploitation are hardly reported. The few written are referred to DOVVSU due to that they do not have records on GBV-related issues.

2. Prevalence of Child Labour

There are a lot of children on the streets who have moved from their villages to the capital in search of greener pastures. Their hopes of getting work are dashed since there is no system created for them to fit into. Thus, they become stranded on the street.

3. Measures to Avoid Child Labour

The Ghana card of all potential employees is to be checked to ensure that the person of age is not a minor. Also, contractors should be educated on child labour and the consequences of exposing minors to hard labour.

4 Works Department

Discussions

1. Role of the Department in the Project

- The works department will not play any significant role in the project since it is a national-level project. The Ministry of Works and Housing and Public Works Department will play a significant role.
- The role of the works department is to approve all documents sent to the assembly.
- They are also to ensure that the safety of the public is assured.
- They will visit the site regularly to inspect whether the demolition and construction is going on according to what has been approved in the waste management plan.
- They also advised that, before the construction, people around the ministerial enclave should be notified of the demolition and reconstruction.
- The contractors should always be in the PPEs and service companies should be notified to disconnect their lines at the commencement of the demolition.
- The sand crate should be watered before the demolition to prevent dust.

5 National Disaster Management Organisation

Discussions

1. Flooding in the Municipality

- KoKMA records flood a lot because it is in a low-land area.

- The western (stretches from the Odaw river towards the Korle lagoon) and southern part of the district records floods and southern part record floods when it rains.
- The Odaw channel collects water from the Aburi mountains from Taifa and Dome area and passes through Caprise and Tesano into the Korley lagoon before moving into the sea. The Korle lagoon is lower than the sea level because when the water gets into the lagoon to be discharged into the sea, the high tides from the sea meet with the water from the lagoon, leading to a receding or backfall which pushes the water into the adjourning communities.
- The rainwater from Kanda, Nima and Asylum down also flows into the Odaw River.

2. Flooding at the Ministerial Enclave

The ministerial enclave does not usually record flooding, but the area around the access bank usually experiences flooding when it rains.

3. Fire Outbreaks

The municipality often records fire outbreaks, but the cause differs in every situation. Some of the fire outbreaks are caused by weak cables, electrical appliances, and gas, among others.

4. Fire Stations in the Municipality

The municipality has two fire stations, and one in the ministry and the other at the Kwame Nkrumah Circle.

5. Measures to Prevent Flooding

- The contractors should ensure that the construction debris is properly dumped. In the past, construction was usually dumped along the sea, but it no longer this way because of the marine drive project.
- The truck that will be transporting the construction debris should not be overloaded to prevent falloffs. These falloffs end up choking drainage system and it end up causing floods.

Appendix 1.8 Electricity Company of Ghana

Discussions:

1. Electricity Supply Situation in the Project Area.

The project area has no power supply because most of the buildings in the enclave have their own transformers. The Electricity Company supplies them with power at 11k, due to that power is stable in the enclave.

2. Measures to Prevent Disruption of Electricity Supply to Other Structures Adjoining the Project Site.

- The electricity Company should be notified so power cables in the building site are disconnected. Also, the electricity Company will have to scan the area to check for high-voltage cables that can be disrupted or cause harm during the excavation.
- An official letter is to be written to request the layout of cables in the enclave in order to be careful during excavations.

3. Increase Electricity Demand

Electricity companies will not have any challenges if there is more demand for power after the reconstruction.

4. Roles and Responsibilities During Project Implementation

Electricity Companies do not have any major role team to perform during the implementation of the project. They will have to be informed about disconnecting the power supply before the structure's demolition and reconnecting it after construction.

Appendix 1.9 Ghana Federation of People with Disability

REPORT ON CONSULTATIVE WORKSHOP WITH PERSONS WITH DISABILITY (PWDs) ON THE GHANA JOB AND SKILLS PROJECT (GJSP) HELD AT ACCRA CITY HOTEL ON 19TH JANUARY, 2023

Introduction

Persons With Disability (PWDs) were introduced to the Ghana Jobs and Skills Project (GJSP) and also solicited inputs that would enable (GJSP) put in place measures that would address the needs of Persons With disabilities. The aim is to ensure that the project deliverables are all accessible and useful to all segments of the labour force.

Presentation of Ghana Labour Market Information System (GLMIS)

The Ministry of Employment and Labour Relations coordinates and regulates the labour market. The Ministry is also mandated to promote job creation in the productive sectors by developing and strengthening intersectoral linkages. Over the years, the Ministry has performed this mandate to the best of its abilities, and we have seen the establishment of the Youth Employment Agency that is implementing several interventions or job creation modules to address youth unemployment.

There are several challenges that impede the ability of the Ministry and its agencies to meet the demands of all job seekers, particularly Persons with Disabilities (PWDs). It was observed with so much concern the difficulties and challenges that most Persons with Disabilities (PWDs) face when it comes to job placement and employment.

These interventions would help generate accurate and disseminated comprehensive data about all the segments of the labour market in a timely manner and implement effective active labour market interventions that would support jobseekers, including Persons with Disabilities.

Presentation on Architectural Design of Labour Department and of the Public Employment Centers (PECs)

Ghana Jobs and Skills Project aims to develop and operationalise the Ghana Labour Market Information System (GLMIS) and revamp 16 Public Employment Centres across the country. The GLMIS is envisioned as a one-stop-shop platform for all labour market data that would enable stakeholders to make evidence-based decisions, such as which skills you would need to develop to facilitate your employment in industry and which sectors are more rewarding, among others. The Public Employment Centres would be in the districts for job counselling and employment promotion purposes.

Recommendations from the Representatives of the PWDs to enable the GJSP implement measures that would address their needs:

- Engagements with Joint Consultative Committee including organizations of Persons With Disability

- There should not be an age limit when operationalizing Ghana Labour Market Information System (GLMIS)

- Data on Persons With Disability must be protected and ensure privacy is applied.

- WhatsApp groups could be created for easy communication or short code to send messages to address the communication challenges most Persons With Disability (PWDs) faced.

- Design and develop targeted programs and measures such as short videos, images and messages that could be used to disseminate information about GLMIS

- Persons With Disabilities require some services that are designed explicitly for Persons With Disabilities, such as disability assessment and referral services and disability support services, as well as disability mainstreamed services. Service delivery must adopt a twin track approach with both mainstreamed and disability-specific targeting of services to ensure the inclusion of persons with disabilities.

- Accessibility is necessary for Persons With Disabilities to live independently, to actively participate in society, and to have unrestricted enjoyment of all rights on an equal basis with others. It refers to the extent to which products, systems, services, environments, and facilities can be used by people with diverse requirements, needs, characteristics, and capabilities to achieve their goals in certain contexts.

- Ghana Labour Market Information System (GLMIS) should take appropriate measures to ensure that Persons With Disabilities access, on an equal basis with others, to the physical environment, to transportation, to information and communications, including Information and Communications Technologies and systems, and to other facilities and services open or provided to the public and to remove barriers and obstacles to accessibility. For example, this means that information must be provided in accessible formats, such as Braille, large print, Sign Language, Easy Read

- Ensure accessibility, reasonable accommodation and specific measures are addressed when revamping Public Employment Centers to assist both formal and informal sectors. Facilities such as washrooms, staircase, floors, exit lift, etc in the building should be disability friendly.

- Public Employment Centers should have PWDs inclusive Officers at the Centers.

Conclusion:

The workshop was productive and provided practical ways to ensure social inclusion to promote sustainable job creation for PWDs.

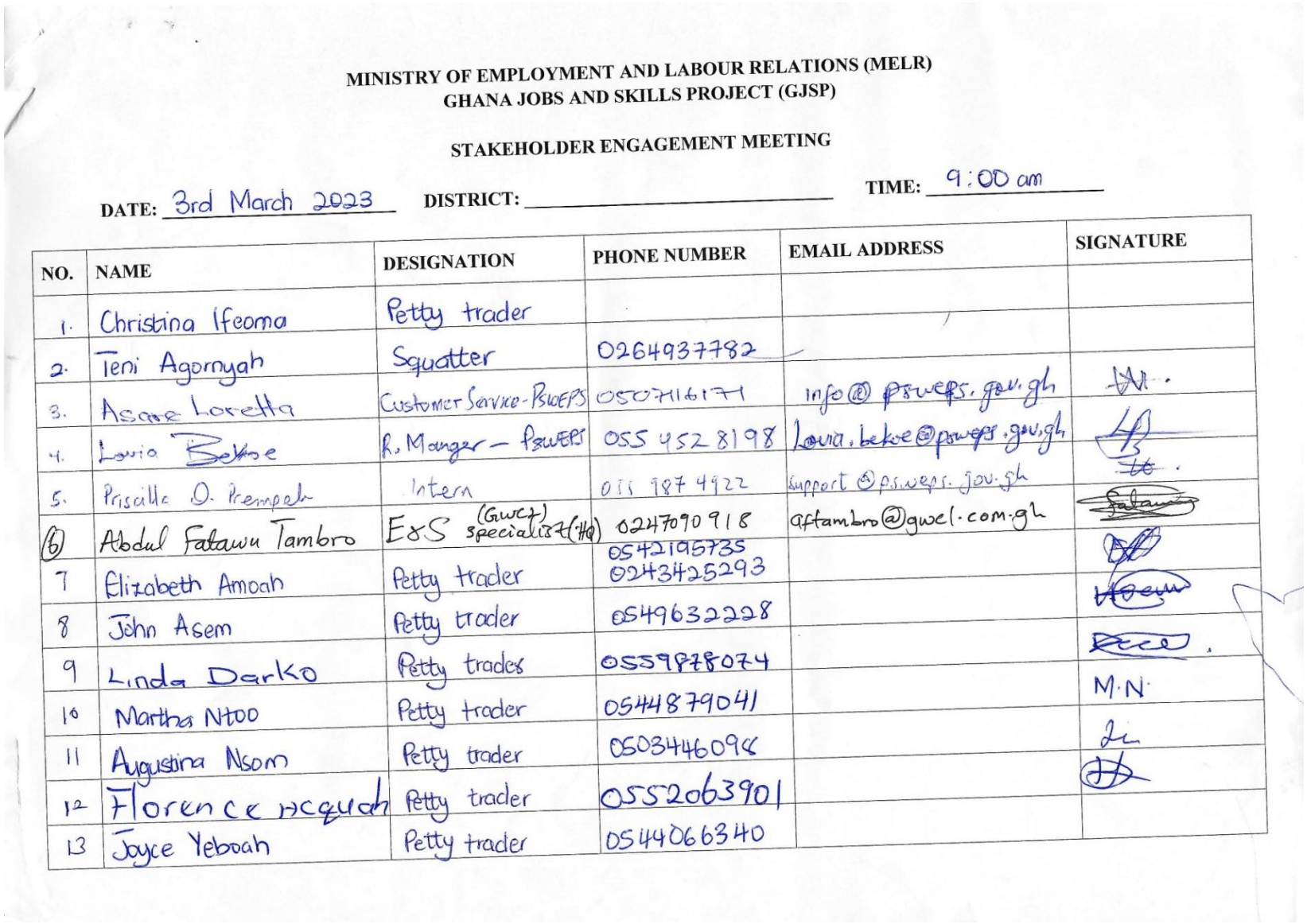
The Ministry was tasked to encourage employers to stop discriminating against PWDs in all aspects of employment relationships.

GJSP should consider inclusive design when constructing the Public Employment Centers

Accra Metro Sewage Unit

Discussions
1. Sewerage Coverage Within the Ministerial Enclave Apart from the Accra sports stadium, the entire ministerial enclave is connected to a sewerage line, so it is possible the labour department is connected to a sewer line.
2. State of Sewerage Network The sewage is pumped and treated at the Mudor treatment plant and flows down to the Ghana Water line.
3. Measures to Prevent Disruption of Sewer Lines During the demolition of the old structure, sewage pipes in the area should be identified and marked with a marker post to alert contractors of the existence of the lines so they to be careful during their demolition and excavations.
4. Sustainability of Sewer Lines During the reconstruction of the building, grease traps should be connected to all plumbing joints, and this enables it to trap any foreign materials that end up in the pipes. He added that tissue papers should be the only material dropped in the sewer lines.
5. Roles of AMSU during Project Implementation If there happens to be any breakage in the sewer lines, it is the property owner's duty to fix it. AMSU only comes in when the public sewer gets blocked.

Attendance Sheets



MINISTRY OF EMPLOYMENT AND LABOUR RELATIONS (MELR)
GHANA JOBS AND SKILLS PROJECT (GJSP)

STAKEHOLDER ENGAGEMENT MEETING

DATE: 3rd March 2023 **DISTRICT:** _____ **TIME:** 9:00 am

NO.	NAME	DESIGNATION	PHONE NUMBER	EMAIL ADDRESS	SIGNATURE
1.	Christina Ifeoma	Petty trader			
2.	Teni Agornyah	Squatter	0264937782		
3.	Asare Loretta	Customer Service-PSWEPS	0507161671	info@pswepps.gov.gh	
4.	Lovia Bekoe	R. Manager – PSWEPS	055 452 8198	Lovia.bekoe@pswepps.gov.gh	
5.	Priscilla O. Prempeh	Intern	055 987 4922	support@pswepps.gov.gh	
6	Abdul Fatawu Tambro	E&S (GWCL) specialist(HQ)	0247090918	afftambro@gwcl.com.gh	
7	Elizabeth Amoah	Petty trader	0542195735 0243425293		
8	John Asem	Petty trader	0549632228		
9	Linda Darko	Petty trader	0559878074		
10	Martha Ntoo	Petty trader	0544879041		M.N.
11	Augustina Nsom	Petty trader	0503446098		
12	Florence Acquah	Petty trader	0552063901		
13	Joyce Yeboah	Petty trader	0544066340		

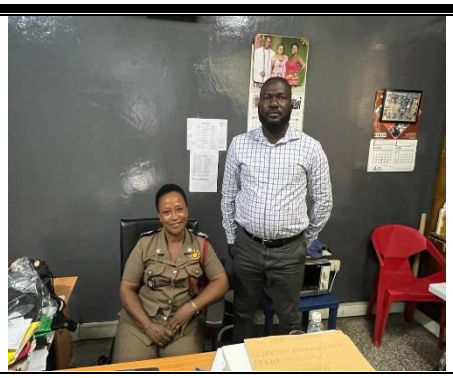
14	Juliana Lomokie Teye	Petty trader	0267429700		
15	Doris Asantewaa	Petty trader	0273596330		
16	Margareth Tetteh	Petty trader	0248347597		
17	Dorcas Ntow	Petty trader	0541231019		
18	Andriana Nelson	Ag. Director/EAA EPA	0244250575	andriana.nelson@epa.gov.gh.	
19	Kafui Bonu	Principal Prog. Officer	0501301439	kafui.amuzu@epa.gov.gh	
20	Valerie Aryee	MELR	0543778271	valeriearyee19@gmi.com	
21	Prince Ofori-Boateng	ESS - GJSP	0244985953	p.bout23@outlook.com	

MINISTRY OF EMPLOYMENT AND LABOUR RELATIONS (MELR)
GHANA JOBS AND SKILLS PROJECT (GJSP)

STAKEHOLDER ENGAGEMENT MEETING

DATE: 8th March 2023 **DISTRICT:** _____ **TIME:** 11:00 ~~pm~~ am

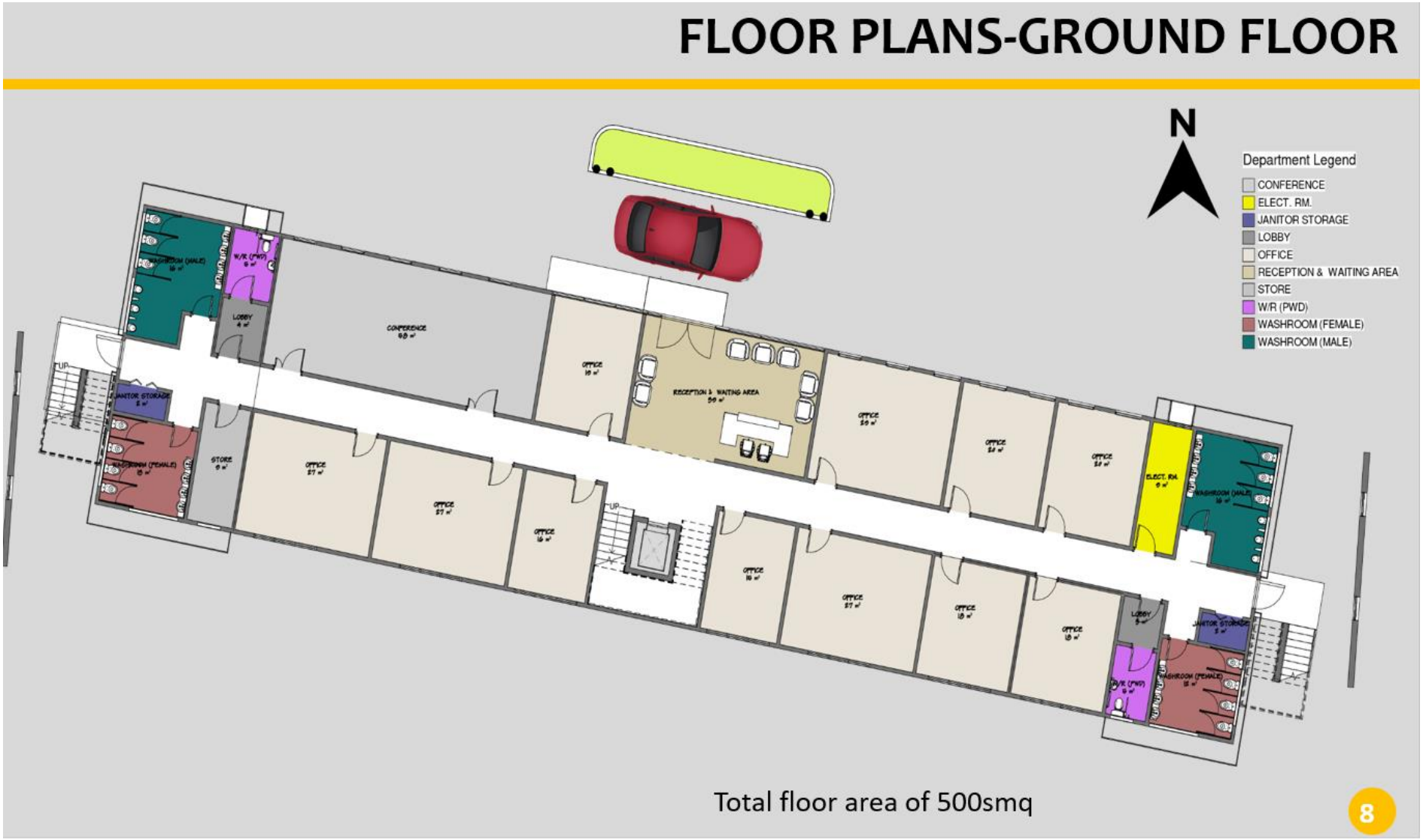
NO.	NAME	DESIGNATION	PHONE NUMBER	EMAIL ADDRESS	SIGNATURE
1.	MR. SELASSIE D. TORGBUSU	GPS	0246609832	dselassie8@yahoo.com	
2.	Valerie Aryee	MELR	0543778271	valeriearyee19@gmail.com	
3.	Prince Ofori-Boateng	ESSS – GJSP	0244985953	p.boat23@outlook.com	

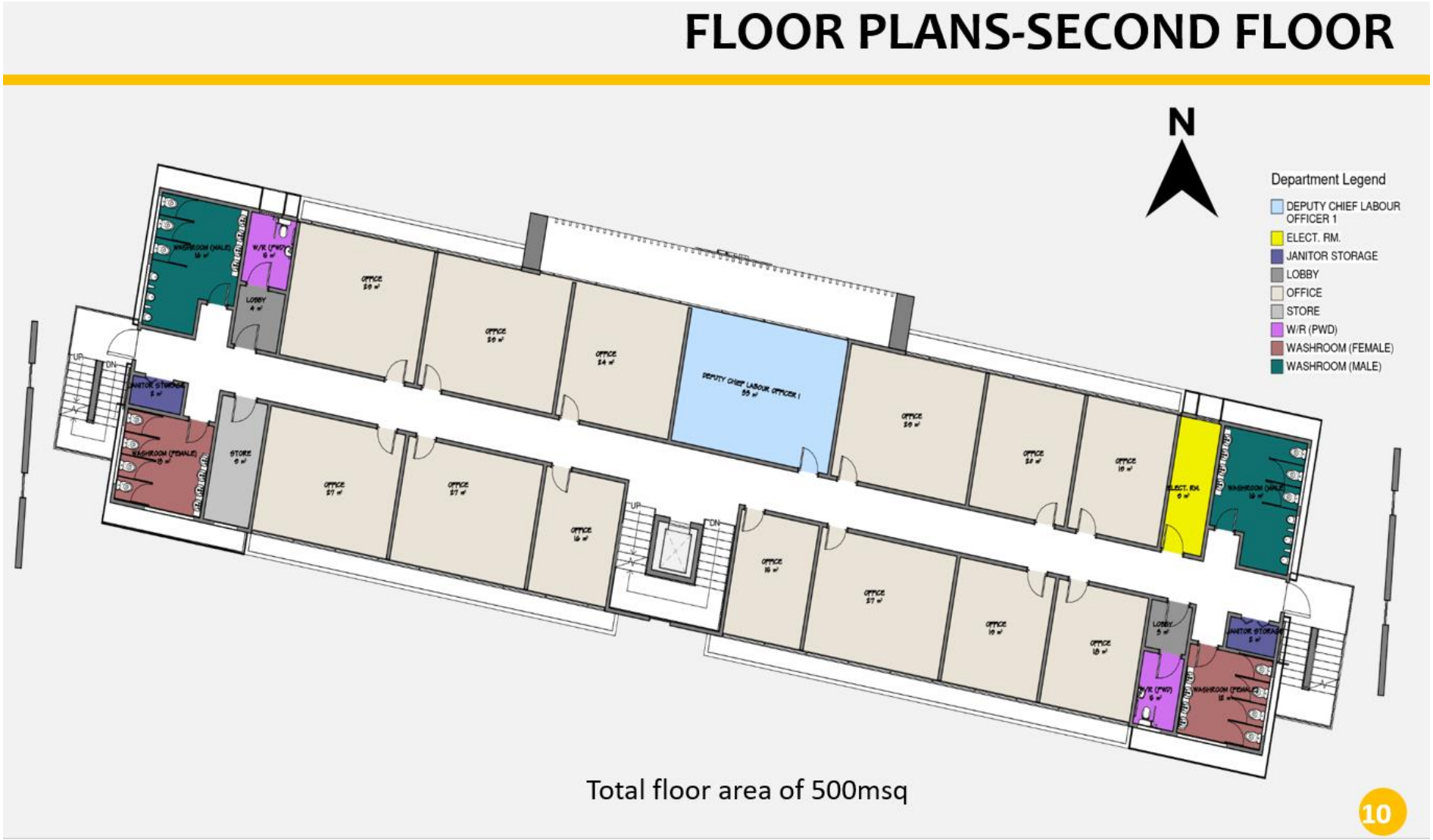
		
GNFS	***GWCL***	***Labour Commission***
		
EPA	***ECG***	***AMSU***
		
KoKMA MCE & MCD	***KoKMA NADMO***	***KoKMA EHSD***
		
KoKMA SWCDD	***KoKMA PPD***	***KoKMA WD***

		
PAP	***PAP***	***PAP***
		
PAP	***PAP***	***PAP***
		
PAP	***PAP***	

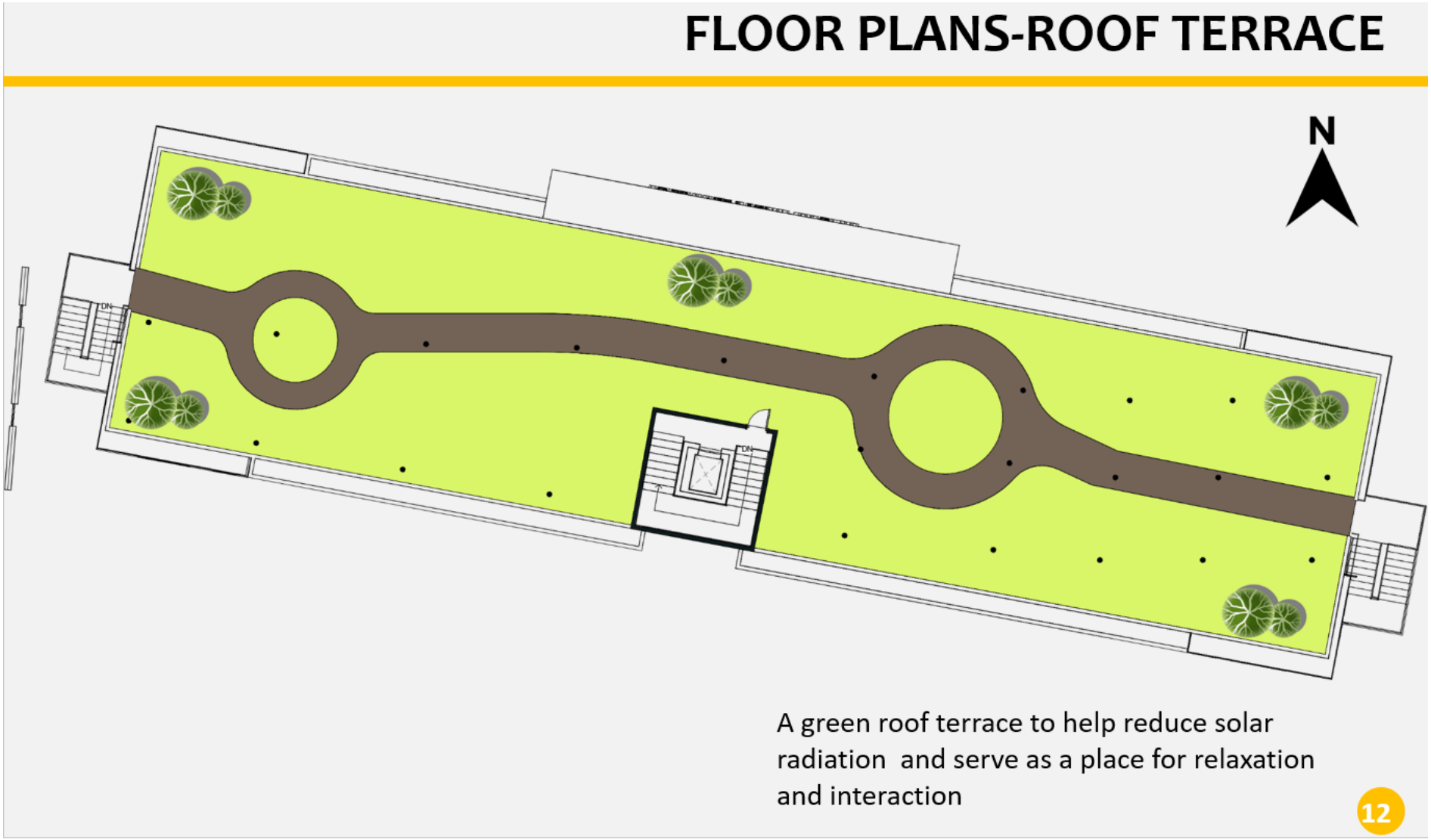
Appendix 2 – Site Plan

Appendix 3 – Architectural Design

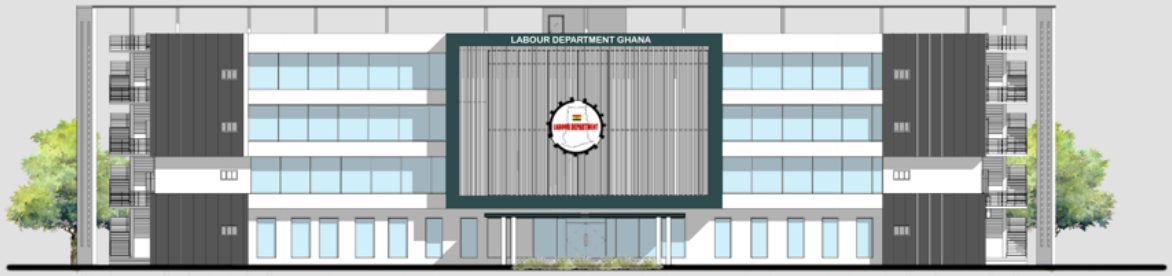



FLOOR PLANS-SECOND FLOOR
N
Department Legend
DEPUTY CHIEF LABOUR OFFICER 1
ELECT. RM.
JANITOR STORAGE
LOBBY
OFFICE
STORE
W/R (PWD)
WASHROOM (FEMALE)
WASHROOM (MALE)
Total floor area of 500msq
10

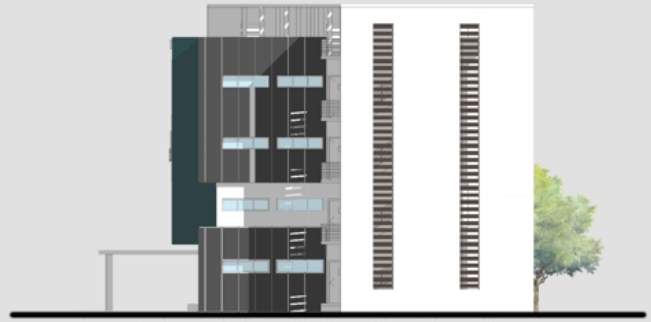
FLOOR PLANS-THIRD FLOOR


FLOOR PLANS-ROOF TERRACE
N
A green roof terrace to help reduce solar radiation and serve as a place for relaxation and interaction
12

ELEVATIONS



FRONT VIEW

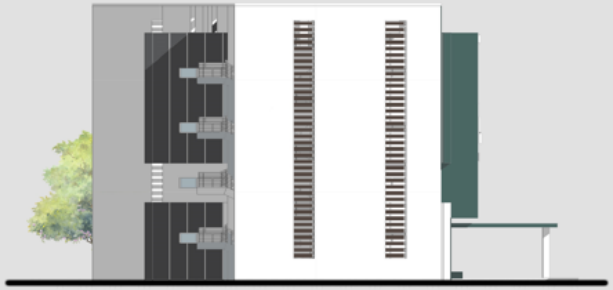


LEFT SIDE VIEW

13

ELEVATIONS

BACK VIEW



RIGHT SIDE VIEW

14

Appendix 4 – Safe Removal and Handling of Asbestos Roofing Sheets

The management of construction waste especially when asbestos are involved must be expertly carried out in order to ensure effective and efficient avoidance of occupational health hazards. The use of asbestos for roofing over a long period of time can expose the asbestos to be extremely carcinogenic. If care is not taken, the workers can be affected by the inhalation of particulate materials with PPMs of less than 5 microns capable of exposing the workers to asbestosis and other upper respiratory tract infections. It is therefore highly recommended that experts with the technical know-how are hired to handle the demolition of any structures that involve the handling of used asbestos in all cases. The project contractor will engage the services of Adipa Waste Management Company Limited (an EPA Accredited Special Waste Handling Company) to transport and dispose of the old asbestos roofing to be generated during the demolition of the existing structures. The Waste Management Company will dispose of the old asbestos roofing sheets at its Engineered Landfill Site close to Nsawam. The MERL ESSS will monitor the contractor's removal, transportation, and disposal of the old asbestos roofing sheets process to ensure that the required protocols are followed. A summary of a number of international standards and regulations for work involving Asbestos Containing Materials (ACM) addresses the following areas as relevant to the handling of asbestos for this project:

- Awareness creation
- Controlling exposure to airborne fibres; and
- Proper disposal.

(a) Awareness Creation

It will be necessary to get all employees to be engaged in the removal, storage, transportation, and disposal of asbestos enlightened and aware on the risks and safety issues involved. Pre-commencement orientation training will be conducted by the Contractor for all employees and will, among others, touch on the following:

- Description of asbestos;
- Means of exposure;
- Risks and health implications of exposure; and
- Preventive and protective measures against exposure.

(b) Controlling Exposure to Air-borne Fibres

Since the danger lies in inhaling air-borne asbestos fibres, the method for removing asbestos roofing sheets will aim at minimal disturbance to the material to lessen the generation of loose asbestos fibres. Workers to be involved will be given the required protective clothing, including a nose mask. Secondary exposure, which involves other persons (aside from the worker) inhaling fibres deposited on clothing or the body of the worker, will be avoided by requiring workers to wash down and change clothes after work.

(c) Proper Disposal

The welfare of the communities and environment will be taken into account during the transportation and disposal of the removed asbestos sheets. The removed sheets, prior to collection for disposal, will be kept on location at a cordoned-off area to restrict access to community folk. All packed sheets will be systematically carted to the Adipa Landfill Site. Carting will be done only by trucks with a carrying bucket which will be covered with tarpaulin after loading the sheets. Disposal at the landfills will be done in lined pits specifically created for the purpose.

Appendix 5 Contractual Clauses

General Clauses

Clause 1

The contractor, including any subcontractor he/she employs, shall be responsible for familiarizing himself/herself with all national and local legislation, the Project's Environmental and Social Management Plan as well as conditions of all permits relating to his/her activities during the construction phase of the project and deliver the project within these laws, guidelines, and conditions of each permit. The Contractor shall obtain any permit that relates to his/her work, notably, an environmental permit from the Ghana Environmental Protection Agency

Clause 2

The contractor shall throughout the implementation/construction phase of the project take all reasonable steps to protect the environment on and off the sites so as to avoid damage or nuisance to persons or property of the public or others resulting from pollution, noise or other causes arising as a consequence of his/her methods of operation.

Specific Clauses

1. Waste Disposal

All wastes, solid, liquid, or gaseous that would be generated as a result of the project works, should be dealt with adequately to avoid environmental problems, either on or off site. The Contractor **must prepare and comply with appro Waste Management Plan, including a Separate Asbestos Management Plan**. Effective spoil and waste disposal at the work site depends on the waste management plan drawn by the Contractor. The clauses below will ensure that the contractor takes the necessary steps regarding waste generation.

Clause 1 Housekeeping

The Contractor shall always maintain all sites under his control in a clean and tidy condition and shall provide appropriate and adequate facilities for the temporary storage of all wastes before disposal.

Clause 2

The Contractor shall be responsible for the safe handling, transportation and disposal of all waste generated as a result of his activities in such a manner as will not give rise to environmental pollution in any form or hazard to human or animal health. In the event of any third party being employed to dispose of waste, the Contractor shall be considered to have discharged his responsibilities only when he has satisfied himself that the proposed handling, transportation and disposal arrangements are such as will not give rise to pollution or health hazard.

Clause 3

The Contractor shall be responsible for the provision of adequate sanitary facilities (e.g., mobile toilets) for his workforce and that of his sub-contractors. The Contractor shall not allow the discharge of any untreated sanitary waste to groundwater or any surface watercourse.

2. Water Resources

Clause 1

The Contractor shall take all reasonable measures, at the site under his jurisdiction, to control the pollution of water resources.

Clause 2

The Contractor shall put in place all reasonable measures to prevent spillage and leakage of materials likely to cause pollution of water resources. Such measures shall include, but not be limited to the provision of bunds around fuel and oil storage facilities.

3. Erosion and Slopes

This refers to construction works at the project site in the rainy season or improper construction methods, which leave the soil exposed unnecessarily, and could cause soil erosion.

Clause

The Contractor shall take all reasonable measures at the site to protect slopes liable to erosion and make them stable.

4. Transportation of Materials

Potential localized problems can arise along the access roads as a result of transportation of construction materials.

Clause

The Contractor shall ensure that vehicles transporting construction materials along the local access roads do not cause a safety hazard, excessive noise, dust or disturbance to any local inhabitants.

The Contractor shall be responsible for cleaning up any material spill associated with the transportation of material to the site

5. Traffic Management during Construction

There are potential negative impacts for existing traffic and road safety as the project works take place. These can be mitigated by requiring the Contractor to undertake temporary traffic management measures.

Clause

The Contractor shall provide, erect and maintain on the site and at such positions on the approaches to the site, traffic signs necessary for the direction and control of traffic. The signs shall be reflectorized or adequately illuminated by night and kept clean and legible at all times. The Contractor has to prepare and submit an EMP with a detailed traffic management plan.

6. Gender Based Violence

Clause 1

The Contractor shall clearly state in his contracts with employees and third-party suppliers that he/she does not condone physical abuse, rape, defilement, illicit sexual behaviours and other gender-based violence together with sanctions for breaching these provisions.

Clause 2

The Contractor shall report any incidence of rape, defilement or other Gender Based Violence and illicit sexual affairs to the nearest DOVVSU/Police Station and the Environmental and Social Specialist of MELR within 12 hours of receiving such as a report.

Clause 3

The Contractor shall support (including availing employees to support GBV investigations and providing compensation for survivors) GBV investigations, persecution and survivor rehabilitation, if his/her employees are under investigation or found guilty of GBV.

Clause 4

The Contractor shall have a Code of Conduct to be explained to their workers in a language they understand and signed off by the latter. The Code of Conduct shall include all punitive measures for any violations.

Clause 5

The Contractor shall inform himself/herself of the Code of Conduct outlined for Contractors/Sub Contractors and their employees including casual labour. This could be Clause 4 and Clause 4 be 5.

7. Labour Relations

Clause 1

The Contractor/Sub Contractor shall not employ minors (18 years or below) as part of his casual or permanent employees.

Clause 2

The Contractor/Sub Contractor shall not engage in forced labour of any kind including forcing employees to work on statutory holidays.

Clause 3

The Contractor/Sub Contractor shall not procure goods or services from third party suppliers that engage in child or forced labour.

Clause 4

The Contractor in his recruitment shall not discriminate by gender, religion, political affiliation, physical disability and ethnicity etc. The Contractor shall prepare a Code of Conduct to be signed by all employees, including those of Sub Contractors, after it is explained to them in a language they understand to guide employees' inter and intra personal

relationships. The Code of Conduct shall specify sanctions for assault, abuse, rape, defilement and other gender-based violence as well as rewards and sanction for working without the appropriate PPEs, among others.

Clause 5

The Contractor/Sub Contractor shall familiarize himself with the Labour Act, 2003 (Act 651), Workmen's Compensation Act, 1987 (Act 174) and other labour related laws in Ghana and work within these laws.

Clause 6

All workers shall be given contracts specifying their tasks, responsibilities and Conditions of Service in line with Ghana Labour Laws.

Clause 7

The Contractor/Sub Contractor shall set up a fair and transparent work-based grievance redress system headed by a management member and protect aggrieved employees against discrimination and persecution.

Clause 8

The Contractor/Sub Contractor shall disclose work-based grievance redress structures to all workers prior to commencement of works.

8. Health and Safety

Clause 1

In advance of the construction/rehabilitation works, the Contractor shall undertake an awareness and hygiene campaign. Workers shall be sensitized on health risks particularly of HIV-AIDS/STIs, COVID-19 and occupational, health and safety risks. Provide site workers with condoms.

Clause 2

The Contractor shall make available the necessary PPEs and first aid kits to site workers including those that contain the spread of COVID-19 (e.g., veronica, bucket, sanitizers, water and tissues) and enforce their use.

Clause 3

Adequate signs to warn project community members of construction activities, diversions, etc. shall be provided at appropriate points.

Clause 4

Construction vehicles shall not exceed maximum speed limit of 20km per hour

Clause 5

The Contractor shall employ a qualified Environmental, Social, Health and Safety Officer to act as focal point for OHS issues and as a community liaison

HSE Reporting

The Contractor shall prepare a monthly progress report to the SE on compliance with these general conditions, the project ESMP if any, an example format for a contractor HSE report is given below. It is expected that the Contractor's reports will include information on:

- HSE management actions/measures taken, including approvals sought from local or national authorities;
- Problems encountered in relation to HSE aspects (incidents, including delays, cost consequences, etc. as a result thereof);
- Changes of assumptions, conditions, measures, designs and actual works in relation to HSE aspects;
- Observations, concerns raised and/or decisions taken with regard to HSE management during site meeting;
- Accident report (if any); and
- Grievances and how they were resolved

It is advisable that reporting significant HSE incidents be done "as soon as practicable, latest within 12 hours of occurrence. Such incident reporting shall therefore be done individually. Also, it is mandatory that the Contractor keeps his own records on health, safety and welfare of persons and damage to property. It is advisable to include such records, as well as copies of incident reports, as appendixes to the monthly reports. Example formats for an incident notification and detailed report are given below. Details of Health Social and Environmental (HSE) performance will be reported to the Client through the SE's reports to the Client.

Training of Contractor's Personnel

The Contractor shall provide sufficient training (including daily toolbox meetings) to his own personnel and that of any sub-contractor and third-party supplier to ensure that they are all aware of the relevant aspects of these general conditions of the project ESMP and ensure that they are able to fulfil their expected roles and functions. Specific training should be provided to those employees that have particular responsibilities associated with the implementation of the ESMP. General topics should be:

- HSE in general (working procedures);
- Emergency procedures; and
- Social and cultural aspects (awareness creation on social issues).

Cost of Compliance

Compliance with these conditions is already part of standard good workmanship and state of art as generally required under this Contract. The item "Compliance with Environmental

Management Conditions" in the Bill of Quantities covers these costs. No other payments will be made to the Contractor for compliance with any request to avoid and/or mitigate an avoidable environmental and social impact.

Sanction

In application of the contractual agreements, non-compliance with the environmental and social clauses, duly observed by the consultant, could be a justification for termination of the contract.

Scope

These environmental and social clauses are binding on the contractor and any sub contractor he/she contracts to undertake any aspect of the project as well as their employees.

Appendix 6 Sample - Code of Conduct for Construction Workers

All the employees of the Contractor and support staff of Supervising Consultant shall adhere to the following Code of Conduct during the execution of the project:

1. Compliance with Applicable Laws, Rules and Regulations

a. All employees shall perform their duties in accordance with the Labour Act, 2003 and other applicable labour laws in Ghana.

b. Employees/key experts will enjoy the freedom of association and expression as defined in the Constitution of Ghana and expressed in Labour Act, 2003 (Act 651) and other labour laws in Ghana.

c. The Organization will not condone the activities of employees who achieve results through violation of the law or unethical business dealings. This includes any payments for illegal acts, indirect contributions, rebates, and bribery.

d. The Organization shall not permit any activity that fails to stand the closest possible public scrutiny.

e. Employees uncertain about the application or interpretation of any legal requirements should refer the matter to appropriate line supervisor

f. Workers/employees who falsify their ages will be summarily dismissed as the company does not tolerate child and forced labour.

g. The Organization will not tolerate any form of child or forced labour from any sub-contractor/employee who practice forced or child labour Clause f above also applies to Contractor's sub-contractors.

h. Employees must report suspected cases of child or forced labour on site to MELR's Environmental and Social Safeguards Specialist or the Supervising Engineer's Environmental and Social Specialist.

2. Compliance with Applicable Health and Safety Requirements

a. Contractors shall be required to have designated health and Safety officers with basic training in first and emergency response.

b. All employees have the right and duty to ensure safe working conditions to the extent of exercising control over tools, equipment, machinery and processes and to express their views on working conditions that may affect their safety and health. Sub-contractors shall do the same for their employees.

c. Employees of the Contractor shall be responsible for removing themselves from danger as much as possible whenever they have good reason to believe that there is an imminent and serious danger to their safety or health. They should have the duty so to inform their supervisor immediately.

d. Employees/key experts should be provided with the appropriate protective gear for the operations or activities and request for same before engaging in any activity associated with the works.

e. No worker shall be allowed to undertake any work without wearing approved protective clothing/gear.

f. Workers shall use and take care of personal protective equipment, protective clothing and facilities placed at their disposal and not misuse anything provided for their own protection or the protection of others

g. First time offenders who are not in the appropriate protective gear will receive a verbal caution, second time offenders will receive a formal written caution, while multiple offenders will receive sanctions ranging from suspensions to dismissal.

h. Except in an emergency, employees, unless duly authorized, should not interfere with, remove, alter or displace any safety device or other appliance furnished for their protection or the protection of others, or interfere with any method or process adopted with a view to avoiding accidents and injury to health.

i. Every employee shall take reasonable care for their own safety and health and that of other persons who may be affected by their acts or omissions at work;

j. Workers shall report to their immediate supervisor, and Health and Safety Officer, any situation which they believe presents a risk and which they cannot properly deal with themselves;

k. Damaged or faulty electrical equipment such as power sockets, leads and appliances should be removed from service.

l. Damaged or faulty equipment should be replaced or repaired by a qualified person as soon as possible.

m. Power points should be protected by safety-shutters, or all vacant power points be covered by plastic plug protectors.

n. Electrical appliances and leads should be kept away from water.

o. All machines and vehicles should be turned off when not in use

p. All employees shall comply with all the safety and health measures prescribed by the employer. Employees should not operate or interfere with plant and equipment that they have not been duly authorized to operate, maintain, or use.

q. Employees should not sleep or rest in dangerous places such as scaffolds, railway tracks, garages, or in the vicinity of fires, dangerous or toxic substances, running machines or vehicles and heavy equipment.

r. Supervisors should not assign employees to undertake activities that the latter do not have the necessary competence, training or certification or that have not been stated in their contract with the Company.

s. Employees should not undertake any assigned activity for which they do not have the necessary competence, training, or certification or that has not been stated in their contract with the Company.

t. Every employee is encouraged to contribute by integrating environmental sustainability issues as they relate to our industry into our business planning, strategies and decision-making.

u. Employees shall avail themselves of all OHS, HIV/AIDS Gender-Based Violence, Emergency Preparedness Training/Sensitization Programmes organized under the project.

v. All Company employees should strive to conserve resources and reduce waste through re-use and other energy conservation measures.

3. Use of Illegal Substances

a. No employee/key expert/sub-contractor shall report to work under the influence of alcohol, or any substance considered illegal under the laws of Ghana, including marijuana.

b. No employee shall smoke or consume alcohol or illegal substances while on duty, including lunches and during overtime meals on company property.

a. Officers and directors *may* authorize, in advance, the consumption of alcohol for special occasions or for certain business meetings as long as such use is limited and does not violate other legal requirements.

b. No employee shall under any circumstance engage in any work related to the organization under the influence of alcohol or illegal substances even if consumption is permitted under the exception described above.

c. Employees who violate this smoking and alcohol conduct standard may have their contract terminated.

d. Smoking legal substances should be undertaken only during break time in a designated smoking area.

4. Non-Discrimination

a. Discrimination against any job applicant or employee on the grounds of colour, race, religion, age, nationality, sex, marital or family status, ethnic affiliation, pregnancy, sexual orientation, disability or other reason is prohibited.

b. In certain cases, however, the requirements of safety regulations relating to specific positions/activities within a construction business will take precedence over clause 4(a).

c. We do not employ any person below the legal minimum age (18 years) and will require commitments from suppliers and subcontractors to refrain from such practices.

d. Workers are not to undertake any assigned activity for which they do not have necessary competence, training or certification or that has not been stated in their contract with the Company.

e. Recruitment, job transfer and progression, remuneration and training and award of discretionary bonuses when applicable are determined solely by the application of objective criteria, fair and unprejudiced opinion, personal performance and merit.

e. Recruitments, transfers, training, maternity leave and standard terms and conditions will be done in accordance with Ghana Labour laws.

f. Employees who perceive that they have been discriminated against can seek redress through their supervisor, Environmental, Health and Safety Officer, management and/or the Ministry of Labour and Social Welfare.

5. Interaction with Community

a. The Company strives to cultivate a local identity in each of its host communities by setting good corporate citizenship standards, while respecting local sensitivities.

b. The Company will regularly contribute to the economic and social development of communities and expects all employees to promote human rights and respectful community involvement anywhere it operates.

c. Employees should comply with the norms, laws, rules, and regulations applicable to the host communities except in cases where they conflict with that of Ghanaian laws.

d. In a case where an employee perceives that the laws, rules, and regulations of beneficiary communities conflict with that of the Organization, employees are to refer such cases to their supervisor, Environment, Health and Safety Officer or manager for further clarification at the Ministry of Labour and Social Security.

6. Sexual Harassment

Sexual Harassment would be considered as unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated. It includes situations where a person is asked to engage in sexual activity as a condition of that person's employment, as well as

situations which create an environment which is hostile, intimidating or humiliating for the victim.

a. Sexual harassment is unlawful.

b. This company does not tolerate sexual harassment in any form.

c. Every employee has a responsibility to ensure that sexual harassment does not occur.

d. No employee shall under any circumstance sexually engage another either by the use of words or actions. Some acts that may be considered as sexual include:

- *an unwelcome sexual advance*
- *a request for sexual favors*
- *unwelcome comments about someone's sex life or physical appearance*
- *sexually offensive comments, stories or jokes*
- *displaying sexually offensive photos, pinups or calendars, reading matter or objects*
- *sexual propositions or continued requests for dates*
- *physical contact such as touching or fondling, or unnecessary brushing up against someone*
- *Indecent assault, defilement, or rape (these are criminal offences).*

e. Any employee who believes he or she has been a target/victim of sexual harassment is encouraged to inform the offending person orally or in writing that such conduct is unwelcome and offensive and must stop or to report the unwelcome conduct as soon as possible to a supervisor, management or the Environmental and Social Specialist – MELR, representative on the Project Grievance Redress Committee or the nearest DOVVSU or Police Station

f. Reports of sexual harassment should be treated promptly, seriously and confidentially.

g. Complainants have the right to determine how a complaint will be treated and knowledge of the outcome of investigations.

h. Anyone found to have sexually harassed another person will be handed over to the Domestic Violence and Victim Support Unit (DOVVSU) of the Ghana Police Force.

i. No employee will be treated unfairly as a result of making a complaint of sexual harassment. Immediate disciplinary action will be taken against anyone who victimizes or retaliates against someone who has made a complaint of sexual harassment.

j. For the purposes of reporting and dealing with sexual harassment and crimes, the Company will provide a hot line to a management level personnel for reporting cases of sexual abuse and harassment.

k. Rape, defilement and assault cases shall be reported to DOVVSU of the Ghana Police Force by survivor or other employees'

7. Violence or Exploitation

a. No employee shall bear any weapon on site unless he/she has been authorized and have a legitimate business reason to do so. Even so, this will have to be with the permission of the appropriate supervisor, manager and conformity with the laws of Ghana.

b. The company is committed to maintaining a safe and secure workplace and working environment. Acts or threats of physical violence, intimidation, harassment or coercion, stalking, sabotage, and similar activities are not tolerated.

c. Employees who engage in acts or threats of violence, outside of self-defense, shall be dismissed and handed over to the Police Station.

d. Employees are expected to treat all individuals with respect, tolerance, dignity and without prejudice to create a mutually respectful and positive working environment.

8. Protection of Children

a. As much as possible, employees are to avoid bringing any person under 18 to work on the project site) unless with permission from Environment, Health, and Safety Officer.

b. Every employee shall be responsible for the safety and well-being of any person under 18 years brought to work by them. *Physical contact with children can be misconstrued by the recipient and those who observe it, and should occur only when completely nonsexual and* otherwise appropriate, and never in private. Should minors be brought on site, to start with?

c. One-on-one meetings with a child or young person are best held in a public area; in a room where the interaction can be (or is being) observed; or in a room with the door left open, and another employee or supervisor is notified about the meeting.

d. Avoid any covert or overt sexual behaviors with children on site. This includes seductive speech or gestures as well as physical contact that exploits, abuses, or harasses.

9. Sanitation Requirement

a. The company shall provide and maintain sanitary facilities (according to building regulations) for all employees to ensure their total health and safety. All such facilities shall be labelled with inscription in suitable language for the understanding of every employee.

b. Every employee/key expert shall be responsible for the appropriate use of sanitary facilities, including toilets, bathrooms and refuse bins/skip containers where provided.

c. No employee shall resort to other inappropriate means of defecation or urination (open defecation or indiscriminate disposal of refuse or urination on the company's compound or project site) apart from what has been prescribed by the company.

d. Any act of indecency with respect to the use of sanitary facilities shall attract punitive actions, including suspensions or even dismissals.

10. Avoidance of Conflict of Interest

a. The Company expects that employees will perform their duties conscientiously, honestly, and in accordance with the best interests of the Organization.
b. Regardless of the circumstances, if employees' sense that a course of action they have been pursued, or are presently pursuing, or are contemplating pursuing may make it difficult to perform the work objectively, they should immediately communicate all the facts to their supervisor.
c. An Employee or a member of his or her immediate family shall not receive inappropriate improper personal benefits because of his or her position in the Organization.
d. Any situation that involves, or may reasonably be expected to involve, a conflict of interest with the Organization should be disclosed promptly to supervisors/ managers.

11. Protection and Proper Use of Property

a. All employees, unless otherwise directed, are responsible for the proper acquisition, use, maintenance and disposal of company assets (e.g., materials, equipment, tools, real property, information, data, intellectual property and funds) and services. Acquisition of assets should comply with the procurement standards of the company.
b. Any act of theft, carelessness, and waste on the part of an employee shall attract sanctions, including the termination of one's work contract.
c. Every employee shall do their part to protect the company's assets and ensure their efficient use.
d. Unless otherwise permitted by management, Company guidelines and procedures, the appropriation of Company property by employees for personal use, or for resale is strictly prohibited.
e. Similarly, you are not permitted to use your authority over other employees to use Company resources for personal benefit.
f. On termination of and at any other time during your employment when requested you must hand over Company's assets and records stored in whatever format or medium.
g. The Company strictly prohibits any access, usage or disclosure of employees' personal data without legitimate authorization. Employees should note that the Company reserves the right to retrieve their e-mails transmitted via the Company e-mail accounts and to monitor your use of the Internet.
h. Every employee shall use company assets only for legal and ethical activities.

12. Report of Violation of Code of Conduct

a. Employees should promote ethical behaviour and encourage other employees to talk to supervisors, managers, or other appropriate personnel when in doubt about the best course of action in a particular situation.
b. In order to protect our organization from unethical or illegal activity, it is your duty and obligation at all times to be watchful of the practices that you see occurring around you, to take reasonable steps to prevent or detect improper conduct, and to report any suspicion of fraudulent, abusive, unethical or illegal activity.
c. All reports of misconduct or unethical behaviour, conflict of interest, or illegal activity are handled in such cases as confidential and be treated seriously and discreetly.
d. Employees may report anonymously, should that be their preference.
e. In the event of a grievance being raised to a manager relating to discriminatory behaviour or harassment, the manager must notify Human Resources immediately, irrespective of how trivial the complaint may appear.

13. Non-Retaliation

a. The company will not tolerate any act of retaliation against anyone who, in good faith, reports known or suspected unethical or illegal misconduct, seeks advice, raises a concern, or provides information in an internal or external investigation or legal proceeding pertaining to the company.

b. Allegations of retaliation will be investigated as appropriate.

c. Acts of retaliation (which may include firing or laying off, demoting, denying overtime or promotion, disciplining, denying benefits, failing to hire or rehire, intimidation or making threats) may lead to disciplinary action against the person responsible for the retaliation, up to and including termination of contract.

d. Any employee who believes he/she has experienced retaliation, should report to his/her supervisor, manager or the ESSS of MELR.

e. Any false accusation of retaliation would attract disciplinary actions, even to the extent of termination of the contract.

Implementation of Code of Conduct

a. The Environment, Health and Safety Officer of the Contractor will be responsible for implementing and enforcing the Code of Conduct while monitoring.
b. The following measures will be adopted to implement the Code of Conduct:
    - The Consultant will ensure that all employees/key experts and sub-contractors are given copies of the Code of Conduct for reference.
    - All employees on the assignment will be made to sign the Code of Conduct.