

INTERNATIONAL BANK FOR RECONSTRUCTION AND DEVELOPMENT  
INTERNATIONAL DEVELOPMENT ASSOCIATION

SECOND PROGRESS REPORT  
ON THE IMPLEMENTATION OF MANAGEMENT'S ACTION PLAN  
IN RESPONSE TO THE  
INSPECTION PANEL INVESTIGATION REPORT No. 47713-GH  
ON THE  
GHANA  
SECOND URBAN ENVIRONMENTAL SANITATION PROJECT  
(IDA CREDIT No. 3889-GH)

JUNE 26, 2012

## **ABBREVIATIONS AND ACRONYMS**

AMA	Accra Metropolitan Assembly
DfID	Department for International Development (UK)
EA	Environmental Assessment
EMP	Environmental Management Plan
FY	Fiscal Year
IDA	International Development Association
IEC	Information, Education and Communication
IFAWAMI	Inter-Faith Waste Management Initiative
IPN	Inspection Panel
ISR	Implementation Status Report
ISWMS	Integrated Solid Waste Management Strategy
MA	Metropolitan Assembly
MTR	Mid-Term Review
NACONWAM	National Coalition of NGOs in Waste Management
NDF	Nordic Development Fund
NGO	Nongovernmental organization
OP	Operational Policy
PAP	Project Affected People
RAP	Resettlement Action Plan
SEA	Strategic Environmental Assessment
UESP II	Second Urban Environmental Sanitation Project

**Ghana**  
**Second Urban Environmental Sanitation Project**

**Second Progress Report**  
**Implementation of Management Action Plan**

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## **I. Introduction**

1. On August 22, 2007, the Inspection Panel registered a Request for Inspection, IPN Request RQ07/06 (hereafter referred to as “the Request”), concerning the Second Urban Environmental Sanitation Project (UESP II) in Ghana, financed by IDA Credit No. 3889-GH. The Request for Inspection was submitted by the Accra-based Centre on Housing Rights and Evictions (COHRE) on behalf of the Agyemankata community, which lives in the area known as Kwabenya within the Greater Accra Metropolitan Area (hereafter referred to as the “Requesters”). The Request focused on one of the sub-components of the overall Project, namely the proposed Kwabenya sanitary landfill. The Requesters claimed that the Bank failed to comply with its policies and procedures; specifically they were concerned about involuntary displacement and health risks to those who would remain in the vicinity of the proposed sanitary landfill. Management submitted its response to the Panel on September 21, 2007. The Panel found the Request eligible and recommended an investigation, authorized by the Executive Directors on November 9, 2007.

2. The Panel issued its findings from the investigation on March 13, 2009. The Panel found instances of noncompliance with provisions of the policies on Environmental Assessment (OP 4.01), Involuntary Resettlement (OP 4.12) and Project Supervision (OP 13.05). Specifically, the provisions relate to the analysis of alternatives, the analysis of impacts in the area of influence of the Project, environmental management plans and resettlement planning, as well as supervision of compliance with Bank safeguard policies.

3. On May 1, 2009, Management submitted its Response to the Inspection Panel’s Investigation Report for consideration by the Executive Directors. The Investigation Report and the Management Report and Recommendation (INSP/R2007-0006/2) were discussed by the Board on June 18, 2009. The Board approved the proposed Management Action Plan (hereafter referred to as the Action Plan), as summarized in Table 1, and it was agreed that Management would report back to the Board on its implementation.

4. A Progress Report to the Board was submitted in August 2011. As noted in that report, the GoG has decided not to proceed with the construction of the Kwabenya landfill. As a result, some of the actions agreed are no longer required or applicable. However, the GoG remains obligated to comply with the Bank’s safeguard policies with regard to the land that was effectively expropriated for the construction of the landfill, and has indicated its commitment to do so. This report provides a summary of the progress on the implementation of the Action Plan and other developments since the August 2011 report.

## **II. Project Summary**

5. Over the past two decades, the key environmental issue in urban areas of Ghana has remained poor sanitation, resulting from inadequate sanitary facilities, drainage, and solid waste management. The situation is becoming more critical due to rapid population growth in metropolitan areas, particularly in Accra. An IDA Credit (US\$ 62.0 million equivalent) for UESP II was approved by the Board of Executive Directors in April 2004. The Project’s development objective is to improve urban living conditions in regard to environmental health,

sanitation, drainage, vehicular access, and solid waste management in a sustainable fashion, with special emphasis on the poor. Project implementation has progressed well after some initial delays and most activities have been completed, or are near completion. The only main project activity that will not be implemented is the construction of the proposed Kwabenya sanitary landfill, which was intended to serve Accra. Out of the US\$ 62 million of the credit, the project has disbursed US\$ 49.3 million and most of the undisbursed funds are committed with ongoing contracts. The main ongoing contracts correspond to the construction of the landfill in Tema and the capping of old dump sites at Accra, Takoradi and Tema. These works are expected to be completed by May 31, 2012.

6. Accra's need for a sanitary landfill was first identified in the Strategic Plan for the Greater Accra Metropolitan Area in December of 1992. Out of 18 candidate sites initially assessed, Kwabenya was considered the most suitable location. In 1997, the United Kingdom's Department for International Development (DfID) funded feasibility studies and preliminary design at Kwabenya, including an Environmental Impact Assessment (completed in March 2000), which confirmed the suitability of the Kwabenya site as the best alternative. The Bank's Environmental and Social Assessment (ESA) for UESP II completed in 2003, included an update of the DfID funded Environmental Impact Assessment. Except for the preliminary civil works (drainage and access road) funded by DfID, which were completed in 2001, development of the Kwabenya landfill never took place due to delays caused by long standing opposition to the landfill by members of the Agyemankata community.

7. In May 2007, the Bank team determined that it was necessary to prepare a new Environmental Assessment (EA) that would focus on the urgent, short-term need for solid waste disposal in Accra, including the possible use of the Kwabenya site for a sanitary landfill. This decision was based on the time elapsed since the original EA was prepared. The principal activities for Kwabenya financed under the UESP II included the preparation of a Resettlement Action Plan (RAP) and the new EA. The RAP was substantially completed in 2009, but the Accra Metropolitan Assembly (AMA) decided not to disclose it until the EA was completed, in order to incorporate any changes that could result from the EA. However, the preparation of the EA was stopped following the decision made by the GoG in October 2010 to abandon the development of a landfill at Kwabenya, as thoroughly explained in the previous Progress Report submitted to the Board in August 2011.

### **III. Management Action Plan**

8. In response to the issues raised in the Panel Report, Management proposed an Action Plan that consisted of a three-pronged approach to address the need for responsible solid waste management in Accra. The *first* was the preparation of an Integrated Solid Waste Management Strategy (ISWMS). The objective of this study was to identify and analyze a range of waste management options for the Greater Accra Metropolitan Area for the *medium to long term*. The ISWMS is expected to form the basis of a new Solid Waste Master Plan for Greater Accra. The *second* was to provide support to the Borrower to prepare the new EA, which was to focus its attention on meeting the *urgent and short term* needs for solid waste management. This would include the analysis of the feasibility of the proposed Kwabenya landfill and the examination of alternatives. The *third* prong of the Action Plan consisted of several activities aimed at providing institutional capacity building for local government and for civil society organizations (CSOs)

with active interest in sanitation issues. A detailed overview over the Action Plan items and their progress can be found in Table 1 (Management Action Plan Implementation Progress).

#### IV. Progress of Management Action Plan Implementation

9. **Overview:** As indicated in the August 2011 Progress Report, the GoG decided in late 2010 to abandon the development of the Kwabenya landfill. Consequently, some of the key activities of the Action Plan such as the preparation of the EA and the RAP for the Kwabenya site were no longer required and hence not implemented. Nonetheless, as also highlighted in that Report, there are certain outstanding issues concerning project-related expropriation actions taken by the government at Kwabenya that require resolution in line with the Borrower's obligations under the Development Credit Agreement (DCA). Efforts to resolve this matter with GoG are ongoing and an agreement has been reached as described below. In addition, good progress was made in the preparation of the ISWMS and in the implementation of activities designed to increase the institutional capacity of local government and raise community awareness on sanitation issues. Table 1 presents an account of progress on each of the items in the Action Plan.

10. **ISWMS:** Preparation of the ISWMS, partially funded by the Nordic Development Fund (NDF), was completed on time, i.e. before the end December 2010. However the document could not benefit from the planned EA consultation due to the cancellation of the latter. The EA consultations were expected to provide additional feasible alternatives for the mid- and long-term solutions to solid waste management and disposal in Accra. However, the AMA is in the process of organizing consultations with stakeholders at the sub-metro<sup>1</sup> level to discuss the alternatives identified and develop an integrated action plan. The AMA has also been looking at alternative landfill sites following the decision to abandon the one proposed at Kwabenya and has identified some potential sites that need to be further assessed.

11. **Institutional Capacity Support:** Several activities were proposed in the Action Plan as part of institutional capacity building. These activities include: technical assistance and clinics to municipal officials; promotion of community awareness and involvement in solid waste management; and development of social accountability mechanisms by NGOs that work on sanitation issues in Ghana. Following are highlights of some of these activities that have been successfully completed and in certain cases are periodically repeated to train new people or refresh the knowledge. Two workshops on solid waste management were organized for municipal officials with emphasis on the operation of landfills. The workshops were held in Takoradi and Kumasi in October 2011. The one in Takoradi was attended by officials and waste management staff from Accra, Takoradi and Tema, and the one in Kumasi was attended by officials and staff from Kumasi and Tamale. The workshops were conducted by international experts and included practical activities at the existing landfills. Clinics on safeguards have also been organized by the Bank for Project Implementation and Coordination Units to refresh and improve staff knowledge. The Bank and the Ministry of Local Government and Rural Development organized the Ghana Innovation Marketplace (GIM), a competition of ideas aimed at improving solid waste management under the theme: "Solid Waste: Big Problem! Big Opportunity!" The top ten initiatives received cash awards in support of their implementation.

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<sup>1</sup> Each of the eleven administrative subdivisions of AMA.

The information disseminated about the competition served also to indirectly promote behavioral change and community participation in solid waste management. The Bank has also sponsored several studies, workshops and meetings with regard to the development of Citizen Report Cards and social accountability in the provision of waste management and water services.

12. **Pending Obligations of the GoG:** As explained in the previous Progress Report, in anticipation of the landfill being constructed at Kwabenya, the GoG issued an Executive Instrument (EI) in January 2007 that effectively expropriated the land from existing owners and lessees. Although none of the land was inhabited at the time, some lessees had initiated construction of houses on their lots, which were halted by the issuance of the EI. The timing of this expropriation was inconsistent with the Borrower's obligations under the DCA, which required that any takings be conducted in accordance with a RAP prepared according to Bank safeguard policies. Preparation of a RAP was subsequently initiated, but because construction of the Kwabenya landfill was abandoned, the RAP has not been completed and implemented. Nevertheless, the EI remains in effect and to date no compensation has been paid to the persons affected by it. As Bank Management explained to the GoG (see letter dated February 25, 2011 included as Annex 1), since the EI was issued during and because of the Project, there is a continuing obligation under the DCA to conclude the process and compensate affected people in accordance with Bank safeguards.

13. After submission of the previous Progress Report, the GoG replied to the Bank by means of a letter dated August 30, 2011 (Annex 2) requesting the use of credit proceeds to pay compensation to owners of the unfinished structures. Bank Management considered this reply incomplete for two reasons: First, it appeared to address only the situation of owners of partially completed structures, hence omitting other owners and lessees of land at the site that would also be entitled to compensation. Second, it left unclear whether the intention of the GoG was to complete the expropriation and retain the land as government land, or to rescind the EI and return the land to previous owners and lessees.

14. Bank Management responded in writing to the GoG on September 15, 2011 (Annex 3) asking it to clarify its intention with regard to the land, i.e. whether the land acquisition will be completed or the EI revoked. Further information was also requested from the GoG with regard to the basis and methodology for the calculation of the total compensation. These pending issues were brought to the attention of the GoG by the Task Team several times as part of the project supervision. Finally, during the Spring Meetings held in Washington DC in April 2012, the GoG communicated to Bank Management its decision to complete the acquisition of the Kwabenya landfill site. In addition the GoG repeated its former request to the Bank to use credit proceeds to pay the compensation for the 76 inhabited structures identified in the draft RAP, while committing to pay for the land from their own funds. This was followed up with a letter sent to the Bank that provided the basis for calculating the compensation that amounts to US\$1,473,020 for the 76 structures (Annex 4).

15. **Management decision.** Management has authorized the use of credit proceeds to pay for the compensation, as requested by the GoG. Management has also authorized a 7 month extension of the closing date, i.e. through December 31, 2012, in order to allow for the appropriate processing of payments in accordance to Bank Safeguards.



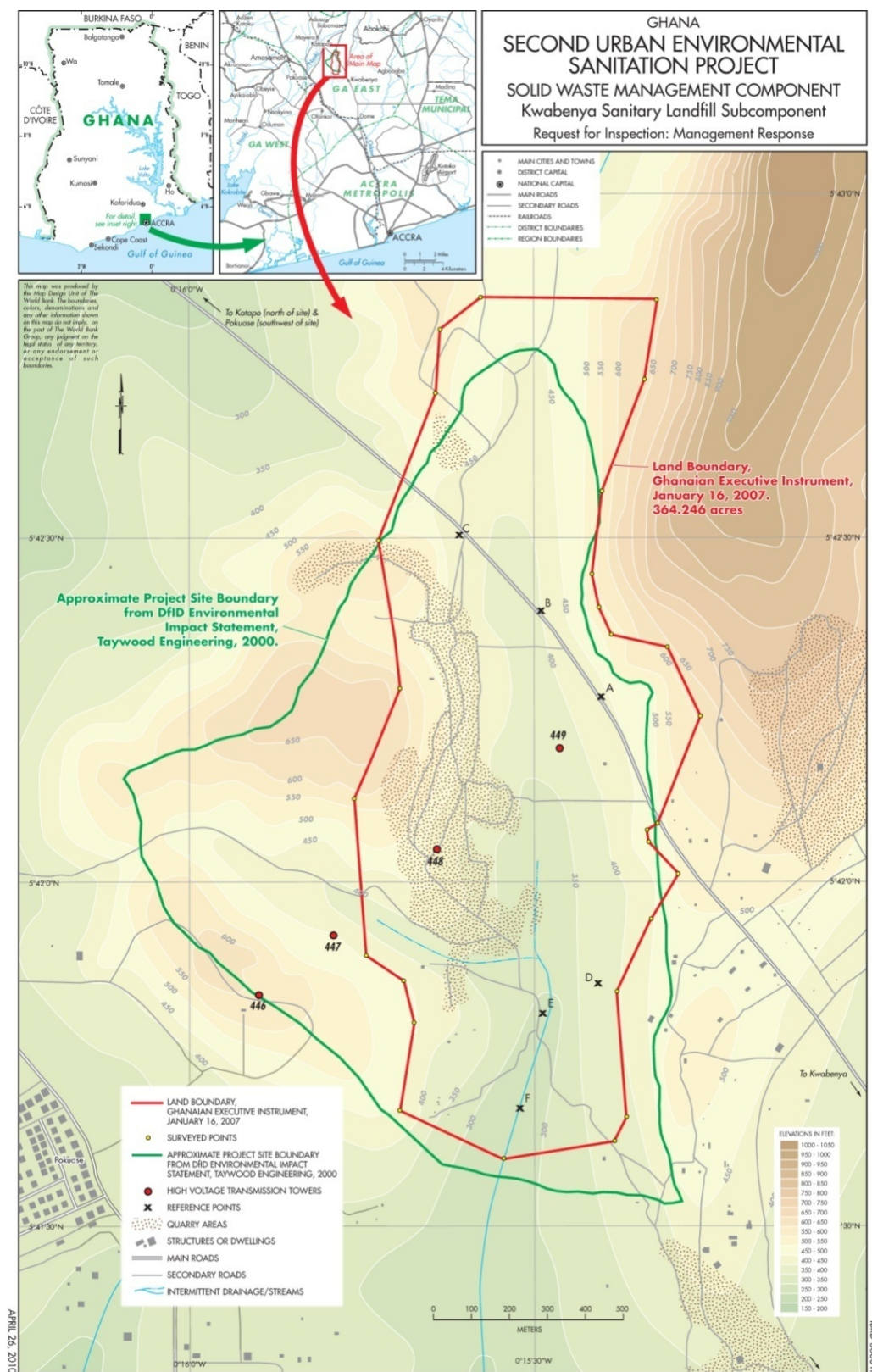
## V. Next Steps

16. Management is pursuing the following steps to address outstanding issues:

- ***Payment of compensation.*** In order to comply with Bank safeguards, the Borrower will be undertaking but not be limited to the following: (i) confirmation and adjustment of the compensation amounts as needed for compliance with DCA obligations, (ii) dissemination of information to affected people about compensation for lost assets and eligibility for compensation; (iii) arrangements for payment of compensation; (iv) procedures for recording and processing grievances; (v) mechanisms for monitoring progress on compensation payments, including monthly progress reports; and (vi) institutional arrangements, including the designation of staff, to provide oversight on the effective delivery of compensation payments.
- ***Consultations and dissemination of the ISWMS:*** AMA is undertaking broad consultations of the ISWMS at the sub-metro level with the participation of key stakeholders. The outcome of those consultations will be an action plan to be implemented in the short, medium and long term to improve solid waste management. That action plan will be properly disseminated and communicated to Accra residents. Given the decision to do not develop the Kwabenya landfill, AMA has identified new potential landfill sites and will proceed with their feasibility assessment shortly. In addition and as part of the implementation of the ISWMS, AMA will be looking at actions to reduce the volume of refuse generated and improve solid waste management.
- ***Coordination between Metropolitan and Municipal Assemblies:*** There has been coordination between AMA and Ga East and Ga West with regard to finding alternative sites to the abandoned Kwabenya landfill. This coordination has been broadened to include the other five municipal and metropolitan assemblies that constitute the Greater Accra Metropolitan Area, and also in scope to include liquid and septic sludge waste management. The new Tema landfill could serve to dispose part the solid waste of AMA, but a new landfill will need to be built that will not be financed out of this credit. As a follow up to the workshop on wastewater management, which was organized by the Bank in February 2011, and the one on solid waste management, which was organized by CHF in June 2011, there will be a number of workshops on institutional aspects held in 2012. These workshops will be supported by Cities Alliance and will focus on the need to coordinate planning and integrate waste management actions throughout the Greater Accra Metropolitan Area.

17. Management will report to the Executive Directors in twelve months time on progress in addressing the pending issues identified above or earlier if closure of these issues is achieved.

### Figure 1. Site Map of the Proposed Kwabenya Site



**Table 1. Overview: Management Action Plan Implementation Progress**

ISSUE	ACTION	IMPLEMENTATION PROGRESS
<b>Environmental Assessment and Mitigation Measures</b>		
Analysis of alternatives	<ol style="list-style-type: none"> <li>1. Per the Aide-Memoire of May 2007, a new EA will be prepared that will focus on the urgent, short-term need for solid waste disposal in Accra. (To be completed by end 2009)</li> <li>2. The Bank will also support an expansion of the scope and accelerate the preparation of the ongoing ISWMS for Accra. The EA will provide input into the ISWMS, based on the scoping conducted and alternatives examined. (To be completed by end 2010)</li> <li>3. The Bank will seek to support an SEA for the ISWMS.</li> <li>4. Government is to appoint a Panel of Experts on all aspects of the Project relevant to the EA.</li> </ol>	<ol style="list-style-type: none"> <li>1. <b>No longer required.</b> The preparation of the EA was suspended following AMA's decision to abandon the development of a sanitary landfill at Kwabenya in September 2010. This decision was endorsed by the GoG in a meeting chaired by Minister of Local Government and Rural Development in October 2010 and formally communicated to the Bank in writing by MOFEP in August 2011.</li> <li>2. <b>Completed.</b> Preparation of the ISWMS, partially funded by the Nordic Development Fund (NDF), was completed on time, i.e. before the end December 2010. Since the document could not benefit from the EA consultation, which might have provided additional feasible alternatives for the mid- or long-term solutions to solid waste management and disposal in Accra, AMA is in the process of organizing consultations with key stakeholders at the sub-metro<sup>2</sup> level to discuss the alternatives identified and develop an integrated action plan.</li> <li>3. <b>On-going.</b> Discussions have been held with the Project Coordinating Unit on the preparation of a Strategic Environmental Assessment (SEA) for the recommendations of the ISWMS, and to broaden it to include the entire Greater Accra Metropolitan Area.</li> <li>4. <b>No longer required.</b> The selection of a Panel of Experts to independently oversee the preparation of the EA is no longer required following the suspension of the EA.</li> </ol>
Buffer Zone	<ol style="list-style-type: none"> <li>5. If the new EA identifies a sanitary landfill at Kwabenya as the preferred alternative, it will evaluate impacts within the landfill's area of influence outside the buffer zone and examine the size of the buffer zone in light of the situation on the ground, current internationally recognized good practice and the Government of Ghana's environmental guidelines. (To be completed by end 2009)</li> </ol>	<ol style="list-style-type: none"> <li>5. <b>No longer required.</b> A buffer zone will not be required since there will be no landfill.</li> </ol>
Environmental Management Plan	<ol style="list-style-type: none"> <li>6. A draft EMP will be prepared as part of the new EA for whichever alternative is chosen to meet Accra's need for solid waste management in the near term. In accordance with good practice, details in the EMP will be identified and finalized as part of final engineering design and</li> </ol>	<ol style="list-style-type: none"> <li>6. <b>No longer required.</b> An EMP will not be prepared since there will be no landfill and no EA will be required.</li> </ol>

<sup>2</sup> Each of the eleven administrative subdivisions of AMA.

ISSUE	ACTION	IMPLEMENTATION PROGRESS
	costing. (To be completed in FY10)	
Consultation	<p>7. The AMA will disseminate a translation of the Draft RAP to the affected population. To supplement the Draft RAP, the AMA will produce an information pamphlet that summarizes entitlements to compensation and assistance, as well as grievance procedures, and distribute this to Project affected people. (To be completed by September 30, 2009)</p> <p>8. Upon finalization of the RAP and clearance by the Bank, the RAP will again be distributed to the affected population and disclosed in accordance with the Bank's Policy on Disclosure. (To be completed by August 31, 2009)</p>	<p>7. <b>Ongoing.</b> Although the GoG confirmed in writing its decision to abandon the development of a sanitary landfill at Kwabenya, the obligation to comply with the Bank's Policy on Involuntary Resettlement (OP 4.12) remains and will continue even if the project closes. As explained to the GoG (refer to letter dated February 25, 2011 included as Annex 1), since an Executive Instrument (EI) was issued during and because of the Project, there is a continuing obligation under the Development Credit Agreement to compensate affected people in accordance with Bank safeguards. The GoG replied to the Bank by means of a letter dated August 30, 2011 (Annex 2) requesting the use of credit proceeds to pay compensation to owners of the unfinished structures, one of the three groups of Project Affected People (PAP) identified by the RAP consultants. However, the GoG failed to indicate what it will do with the existing EI that legally vests in the President on behalf of the Republic of Ghana ownership of the site for the development of the landfill. Bank Management wrote back to the GoG on September 15, 2011 (Annex 3) asking to clarify its intention with regard to the land, i.e. whether the land acquisition will be completed or the EI revoked. Further information was also requested to the GoG with regard to the basis and methodology for the calculation of the total compensation. These pending issues were brought to the attention of the GoG by the Task Team several times as part of the project supervision. Finally, during the Spring Meetings held in Washington DC in April 2012, the GoG communicated to Bank Management its decision to complete the acquisition of the Kwabenya landfill site. In addition the GoG repeated its former request to the Bank to use credit proceeds to pay the compensation for the 76 inhabited structures identified in the draft RAP, while committing to pay for the land from their own funds. This was followed up with a letter sent to the Bank that provided the basis for calculating the compensation that amounts to US\$1,473,020 for the 76 structures (Annex 4).</p> <p>Management has authorized the use of credit proceeds to pay for the compensation, as requested by the GoG. Management has also authorized a 7 month extension of the closing date, i.e. through December 31, 2012, in order to allow for the appropriate processing of payments in accordance to Bank Safeguards. In particular the Borrower will be required but not limited to the following: (i) confirmation and adjustment of the compensation amounts as needed for compliance with DCA obligations, (ii) dissemination of information to affected people about compensation for lost assets and eligibility for compensation; (iii) arrangements for payment of compensation; (iv) procedures for recording and processing grievances; (v) mechanisms for monitoring progress on compensation payments, including monthly progress reports; and (vi) institutional arrangements, including the designation of staff, to provide oversight on the effective delivery of compensation payments.</p> <p>8. <b>Ongoing.</b> Disclosure to be done upon completion of updated Draft RAP, or other document acceptable to the Bank that provides information to affected people about compensation for lost assets and eligibility for compensation, as indicated in Item No. 7 above.</p>

ISSUE	ACTION	IMPLEMENTATION PROGRESS
	<p>9. The consultants for the new EA will develop and undertake a consultation strategy that, at a minimum, fulfills the requirements of OP 4.01 for consultation on the scope of the EA and on the draft EA. (To be completed by end 2009)</p> <p>10. Consultation on the scope of the EA will also serve as an initial consultation on the scope of the ISWMS for Accra. (To be completed by end 2009)</p> <p>11. The EA will also be disclosed in accordance with the Bank's Policy on Disclosure. (To be completed in FY10)</p>	<p>9. <b>No longer required.</b> The preparation of the EA was cancelled following the decision to abandon the development of the landfill.</p> <p>10. <b>Ongoing.</b> A separate consultation for the ISWMS is planned. Since the ISWMS could not benefit from the EA consultation, AMA is in the process of organizing separate consultations with key stakeholders at the sub-metro level.</p> <p>11. <b>No longer required.</b> The disclosure is not required since the EA was cancelled.</p>
Institutional Capacity	<p>12. Technical Assistance. Technical assistance is being provided to Metropolitan Assemblies (MAs) to develop and implement Information, Education and Communication (IEC) strategies as part of a broader communications program. This program includes: communications training for key staff of MAs, assistance in the development and production of communication materials for dissemination and the conduct of campaigns. In addition, a solid waste specialist is being incorporated into the Bank task team to visit all of the existing landfills and dumps in the five MAs at least twice a year to assess their operations, provide recommendations for improvement and monitor the outcomes. (To commence by end 2009)</p> <p>13. Operations and Maintenance Support. During the Mid-Term Review it was agreed to reallocate credit funds to increase disbursement category 4, which finances operating costs for sanitary landfills, refuse collection and others, so that MAs can cover their entire service area. In addition, to help address long-term needs, a workshop will be held in 2009 for local waste management officials and civil society organizations. (To be completed by</p>	<p>12. <b>Completed.</b> Technical Assistance has been provided to MAs for the development of IEC strategies, and campaigns are regularly conducted at the MAs. In addition, two workshops on solid waste management were organized for municipal officials with emphasis on the operation of landfills. The workshops were held in Takoradi and Kumasi in October 2011. The one in Takoradi was attended by officials and waste management staff from Accra, Takoradi and Tema and the one in Kumasi was attended by officials and staff from Kumasi and Tamale. A senior solid waste specialist joined the Bank task team in May 2009 and the following month visited the existing landfills in the Project cities plus other dump sites in Accra. He was accompanied by an NDF consultant who looked into possibilities for applying for Carbon Funds which are about to be implemented in Kumasi. Follow up missions have taken place in April 2010, October 2010 and January 2011.</p> <p>13. <b>Completed.</b> A workshop was organized under the auspices of the Minister of Local Governments and Rural Development for all of the Mayors in June 2009 and funds were reallocated to increase disbursement category 4, which finances operating costs for sanitary landfills, solid waste collection and management equipment and others.</p>

ISSUE	ACTION	IMPLEMENTATION PROGRESS
	<p>end 2009)</p> <p>14. Social Accountability. The Bank is supporting the development of community score cards by the coalition of NGOs<sup>3</sup> that works on sanitation in Ghana in order to promote awareness in the communities and social accountability with regard to landfill operations and solid waste management in general. (Ongoing – The score cards to be completed in FY09)</p> <p>15. Community Participation. The Bank is providing support for a competition on how to improve solid waste management through community and private sector participation in activities such as recycling, composting, energy recovery, information campaigns, etc. Cash awards will be available to support the implementation of the winning proposals. The publicity for this competition will also serve to create awareness in the communities. (To be completed by end 2009)</p> <p>16. Education. Campaign on sanitation with IFAWAMI, which reaches 98 percent of the people in Ghana through churches, mosques and other religious centers. (Ongoing)</p>	<p>14. <b>Completed.</b> The Bank has sponsored a number of workshops and meetings with regard to the development of Citizen Report Cards by the coalition of NGOs working on Waste Management (CONWAM),<sup>4</sup> beginning with a day-long workshop held on May 26, 2009. Proposals were prepared by CONWAM and CONIWAS<sup>5</sup> in regard to expenditure tracking and social accountability in the provision of waste management and water services, respectively. The Bank formally announced the provision of grants to both CONWAM and CONIWAS at a ceremony held on October 9, 2009 and their activities are ongoing. In addition to working at the community level to educate the people, CONIWAS and CONWAM have briefed and obtained endorsement from key committees of the Ghanaian Parliament and local government officials on the social accountability exercise. In addition, a survey was completed in December 2009 for the entire AMA as part of a parallel Citizen Report Cards exercise on municipal services that included solid waste management. The dissemination of the results began in August 2010, when the Mayor presented an action plan to improve solid waste management that the communities will track. The dissemination exercise continued at the sub-metro level.</p> <p>15. <b>Completed.</b> A competition denominated Ghana Innovation Marketplace (GIM), supported by the Government of Ghana and the World Bank, was launched in the five largest cities of Ghana (UESP II cities) in June 2009. In addition to generating initiatives to improve waste management under the theme: "Solid Waste: Big Problem! Big Opportunity!" the competition served indirectly to promote behavioral change and community participation in waste management. A key highlight of the competition was the workshop held in Kumasi on November 11-12, 2009, organized by the Engineering Department of the University of Ghana and presided by the Minister of Local Government and Rural Development. By the competition closing date of November 30, 2009, a total of 142 entries had been received from the five major cities: Tamale, Kumasi, Sekondi-Takoradi, Tema, and Accra. The authors of the top 100 proposals received extensive training during March 2010 in order to convert the proposals into implementable business plans. The top 10 proposals were awarded cash prizes to help implement their business plans that covered different areas such as advocacy and education, value addition and improved solid waste collection.</p> <p>16. <b>Ongoing.</b> The campaign remains ongoing by the different religious organizations. In addition the Task Team Leader has participated in several educational radio programs on waste management.</p>
<b>Social Impact Assessment and Mitigation Measures</b>		
Finalization of the RAP	17. The RAP is being finalized. Depending on the outcome of the EA process, the RAP may need to be revised or, if the site is not	17. <b>Ongoing.</b> As noted in Item No. 7 above, although the GoG decided to abandon the development of a sanitary landfill at Kwabenya, the obligation to comply with the Bank's Policy on Involuntary Resettlement (OP 4.12) remains and will continue even if the project

<sup>3</sup> The former National Coalition of NGOs in Waste Management (NACONWAM), which has now been renamed CONWAM. The Bank's Vice President for the Africa Region launched this effort with the coalition and other civil society organizations in March 2009.

<sup>4</sup> Formerly NACONWAM.

<sup>5</sup> Coalition of NGOs in Water and Sanitation (CONIWAS).

ISSUE	ACTION	IMPLEMENTATION PROGRESS
	found suitable, not implemented. (To be completed by August 31, 2009)	closes. Compensation entitlements will vary depending on the GoG's decision with regard to the land and will have to be reflected on either an updated draft RAP, or other document acceptable to the Bank. A reminder has been sent to the GoG to inform the Bank on its decision with the land and the basis and methodology for the calculation of the compensation.
<b>Project Supervision</b>		
Supervision	<p>18. A senior social safeguards specialist will continue to provide support to the Bank task team for RAP preparation and its eventual implementation. (Ongoing)</p> <p>19. A lead environmental specialist will continue to provide support to the Bank task team during preparation of the EA and eventual implementation of the EMP. (Ongoing)</p> <p>20. Formal Project supervision missions will be organized at least twice a year and progress on implementation of safeguards recommendations from the RAP and the EMP will be monitored and reported. (Ongoing)</p>	<p>18. <b>Ongoing.</b> A senior social safeguards specialist has continued to provide support to the Bank team in Ghana, including missions and conference calls. The last mission took place during February 1-3, 2012.</p> <p>19. <b>Ongoing.</b> A lead environmental specialist has continued to provide support to the Bank team in Ghana. He is also in contact with the team's senior environmental specialist who periodically supervises the project.</p> <p>20. <b>Ongoing.</b> In addition to formal supervision missions, the Bank task team meets or talks with the Project Coordination Unit periodically. In order to strengthen the capacity of the project implementation and coordination units with regard to safeguards, the Bank has visited all the units and has organized a follow up to the workshop held for the five project implementation units on April 19, 2011. This workshop, which was open to other project implementation units as well, was held on October 20, 2011. In addition, a high level meeting will be held with the Government to discuss the differences between the Bank's OP 4.12 and the Government's resettlement procedures and variant interpretations of property and user rights. Finally, the Project Coordination Unit continues to have the services of an experienced social development specialist who visits frequently the project sites and provides support to the five Project Implementation Units.</p>
Assessing and Reporting Risks	21. The "Key Issues and Actions for Management Attention" section of the Implementation Status Report (ISR) will include a special section on the progress made in regard to Kwabenya. (Ongoing)	21. <b>Ongoing.</b> A section on the Kwabenya subcomponent has been included under key issues in the ISR.





## ANNEXES



February 25, 2011

Dr. Kwabena Duffuor  
Minister of Finance & Economic Planning  
Ministry of Finance & Economic Planning  
Accra

Dear Dr. Duffuor,

***Second Urban Environmental Sanitation Project (UESP II)***  
***Re: Kwabenya Landfill***

This is in reference to the sanitary landfill that was proposed to be built under the UESP II in Kwabenya. The Bank has been advised orally by the Project Director and by AMA officials that the Government of Ghana (GoG) no longer intends to construct the landfill and will not use project funds for that purpose. To ensure clarity on this point and to enable us to maintain complete project documentation, we would be grateful if we could receive an official written communication from the GoG confirming this decision.

We would also like to bring to your attention that, notwithstanding the decision to exclude Kwabenya from the project, the GoG has certain continuing obligations with respect to the site under its Development Credit Agreement (DCA) with the Bank. Section 3.03 of the DCA states as follows:

*The Borrower shall, prior to commencing work on any storm drainage, sanitation, solid waste management or community infrastructure upgrading and prior to any displacement of any Affected Persons from such works:*

*(c) for the sanitary landfill at Kwabenya, the sanitary landfill in Tema, rehabilitation of refuse dumps at Mallam, Oblogo, Kpone, and Essipon, and community infrastructure upgrading in all Project Cities, prepare and furnish to the Association, a detailed resettlement action plan acceptable to the Association documenting the implementation arrangements for resettlement arising from such works, including compensation, relocation and rehabilitation of Affected Persons;*

*(d) complete the implementation of such resettlement action plan in a manner satisfactory to the Association.*

As you know, an Executive Instrument for land acquisition at the site was issued in 2007, vesting ownership of the land in the state, extinguishing the rights of the land owners and lessees and restricting them from entering or developing the land. This occurred prior to the preparation of a Resettlement Action Plan (RAP), contrary to the requirements of the DCA. When informed of this discrepancy by the Bank, the Government agreed to postpone completion of the acquisition process in order for a RAP to be prepared and to ensure that compensation and resettlement would be conducted in accordance with the DCA.

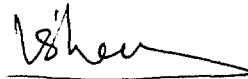
We recognize that it is no longer the intention of the Government to include the Kwabenya site in the project and fully appreciate the reasons for which that decision was made. Nevertheless, because the land taking occurred during and in connection with the project, there

is a continuing obligation under the DCA to ensure that compensation is paid in accordance with Bank policy as reflected in an approved RAP.

We have been told that there are two possible scenarios for next steps with respect to the land at Kwabenya. One is to rescind the Executive Instrument (EI) and return the land to the affected owners. The other is for government to keep the land and use it for another purpose. Under either scenario, the DCA obligations apply. If the EI is rescinded, Bank policy would require compensating owners for losses, if any, that may have been incurred during the intervening years as a result of the taking. If the EI remains in place, full compensation in accordance with the RAP is required. We recognize the Government's diligent efforts to complete the RAP in very difficult circumstances. Our understanding is that with respect to those affected by the EI, the RAP is virtually complete, although it may be necessary to update the valuation data.

We believe that both Government and the Bank have a strong shared interest in resolving this matter as quickly as possible, consistent with the terms of the DCA. Therefore, we would be grateful to know as soon as possible what the Government's plans are for the site, for the completion of the RAP, and for the timely payment of compensation to affected people. We would be happy to work with the Government and the Project team to ensure that outstanding issues concerning the Kwabenya land are resolved as soon as possible.

Sincerely,



Ishac Diwan  
Country Director for Ghana  
Africa Region

cc: The Hon. Minister, Ministry of Local Government & Rural Development  
The Chief Director, Ministry of Local Government & Rural Development  
The Chief Director, Ministry of Finance & Economic Planning  
The Head, World Bank Unit, Ministry of Finance & Economic Planning  
The Project Director, UESP II  
The World Bank Executive Director for Ghana

In case of reply the  
number and date of this  
letter should be quoted

Our Ref.: WBU/UESP II /Vol.II  
Your Ref.:  
Tel. No.: 0302 686 154/ 667 231



REPUBLIC OF GHANA

**MINISTRY OF FINANCE &  
ECONOMIC PLANNING**  
**P. O. BOX MB 40**  
**ACCRA**


AUGUST, 2011

09/08/2011

**SECOND URBAN ENVIRONMENTAL SANITATION PROJECT**  
**DISCONTINUATION OF THE KWABENYA SANITARY LANDFILL AND**  
**REQUEST FOR PAYMENT OF COMPENSATION**

Reference is made to your letter of February 25, 2011 seeking the status of government's position on the Kwabenya Sanitary Landfill, a component of the Second Urban Environmental Sanitation Project and payment of the outstanding compensation to the affected persons.

2. We write to officially confirm that Government has resolved to discontinue the proposed construction of the Kwabenya Sanitary Landfill under the Accra Metropolitan Assembly's Waste Management Component of the Project.
3. In addition, we are requesting for the Bank's approval, the utilization of part of the undisbursed project funds to settle the outstanding compensation payment in respect of the above mentioned activity. The total compensation due the affected persons as a result of the acquisition of land for the Kwabenya Sanitary Landfill is **US\$1,473,020.00 (one million, four hundred and seventy three thousand, and twenty United States Dollars)**.
4. Based on discussions already held with the Bank, we expect that the no objection will be granted on time, to enable Government settle the outstanding compensation arising out of the acquisition.
5. We count on your continued co-operation and support as a partner in development.

  
**HON. DR. KWABENA DUFFUOR**  
**MINISTER**

**THE COUNTRY DIRECTOR**  
**WORLD BANK OFFICE**  
**ACCRA**

cc: Hon. Minister, MLGRD  
Hon. Dep. Ministers, MOFEP  
Chief Director, MOFEP  
Project Coordinator, UESP II



September 15, 2011

Dr. Kwabena Duffuor  
Minister  
Ministry of Finance & Economic Planning  
Accra

Dear Dr. Duffuor,

***Second Urban Environmental Sanitation Project (UESP II)***  
***Discontinuation of Kwabenya Sanitary Landfill***

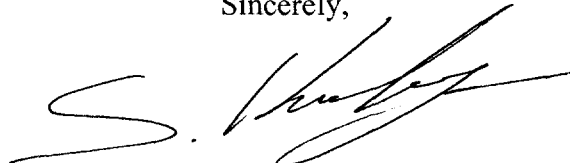
Thank you for your letter of August 30, 2011, in which you confirm the Government of Ghana's decision to discontinue the proposed construction of a sanitary landfill at Kwabenya.

We note your request for the World Bank's no objection to use project funds for paying compensation to affected persons at the Kwabenya site. In order to help us respond to your request expeditiously, we would be grateful for further clarification on two issues:

- (i) Could you clarify whether it is the intention of the Government to complete the land acquisitions initiated with the issuance of the Executive Instrument in January 2007, or alternatively, whether the Executive Instrument will be revoked and the land returned to the affected persons.
- (ii) We would be grateful for further information concerning the basis and methodology for the calculation of the total compensation mentioned in your letter.

As you will recall, in our letter to you dated February 25, 2011, it was explained that since the land taking occurred during and in connection with the project, there is a continuing obligation under the Development Credit Agreement (DCA) to ensure that compensation is paid in accordance with the Bank's policy. Your help in understanding this calculation would be much appreciated.

Sincerely,



Sergiy V. Kulyk  
Acting Country Director for Ghana  
Africa Region

cc: The Hon. Minister, Ministry of Local Government & Rural Development  
The Deputy Ministers, Ministry of Finance and Economic Planning  
The Chief Director, Ministry of Local Government & Rural Development  
The Chief Director, Ministry of Finance & Economic Planning  
The Head, World Bank Unit, Ministry of Finance & Economic Planning  
The Project Director, UESP II  
The World Bank Executive Director for Ghana





In case of reply the  
number and date of this  
letter should be quoted

Our Ref.: WBU/UESPII/Vol. II  
Your Ref.:  
Tel. No: 667231/686154



REPUBLIC OF GHANA

MINISTRY OF FINANCE &  
ECONOMIC PLANNING  
P. O. BOX MB 40  
ACCRA

27<sup>th</sup> APRIL, 2012

**SECOND URBAN ENVIRONMENTAL SANITATION PROJECT**  
**REQUEST FOR NO OBJECTION TO UTILISE FUNDS FOR PAYMENT OF**  
**COMPENSATION ON THE KWABENYA SANITARY LANDFILL SITE**

Reference is made to our letter dated August 30, 2011 requesting for the payment of compensation in respect of the Kwabenya Sanitary Landfill (copy attached).

2. This is to remind the Bank of our request for no objection to utilize an amount of **US\$1,473,020.00** from the Second Urban Environmental Sanitation Project to enable us pay compensation to affected people within the Project area of the Kwabenya Sanitary Landfill Site.

3. The methodology for calculating the total compensation was based on the principle of Open Market Valuation as reflected in the Resettlement Action Plan in August 2009 submitted to the Bank.

4. On the land acquisition issue, the Government will complete the land acquisition which was initiated with the issuance of the Executive Instrument in January 2007.

5. Attached, herewith is the summary of the valuation report and Land Valuers Certification to facilitate payment.

6. Counting on your usual cooperation.

  
**ENOCH H. COBBINAH**  
**CHIEF DIRECTOR**  
**for: MINISTER**

**THE COUNTRY DIRECTOR**  
**WORLD BANK OFFICE**  
**ACCRA**

cc: Hon. Minister, MoFEP  
Hon. Minister, MLGRD  
Hon. Deputy Ministers, MOFEP  
The Chief Director, MoFEP  
The Chief Director, MLGRD  
The Project Coordinator, UESPII



### Cost Estimates for RAP Implementation

Item No	Size/Unit	GH¢/Acre	Total Amount
Loss of undeveloped land	238.73acres	GH¢15000/Acre	<b>3,580,950</b>
Compensation for loss of uncompleted structures on Private land	76 structures <sup>1</sup>	See Annex 1: Valuation Report	<b>1,473,020</b>
	<b>Sub-total</b>		<b>5,053,970</b>
<b>Cost of restoration of Livelihood</b>			
Transitional allowance and Special assistance for stone crackers	Monthly Income range for stone crackers	Maximum income for two month	
	106 (income<100 GHC)	106x100x2	21,200
	368 (100<income<200GHC)	200x368x2	147,200
	113 (200<income<300GHC)	113x300x2	67,800
	42 (300<income<400GHC)	42x400x2	33,600
	21 (400<income<500GHC)	21x500x2	21,000
	57 (income>500GHC)	57x500x2	57,000
	<b>Sub-total</b>	<b>347,800</b>	<b>347,800</b>
2-month transitional allowance for estimated 300 stone crackers yet to be registered based on average monthly income of GHC300	300 stone crackers with average monthly income of GHC300	300x300x2	180,000
Administration of RAP Implementation and Monitoring	24 months	5000	120,000
Contingency Cost (5% of 5,701,770)			285,088.50
<b>TOTAL</b>			<b>5,986,858.50</b>

The RAP budget includes a justification of all assumptions made in determining compensation rates and other cost estimates.

**Exchange Rate as of May 2008 was US\$1.00: GH¢1.00**

<sup>1</sup> Cost of structures includes replacement value of land.

## SUMMARY OF ANNEX 1 VALUATION REPORT AND LAND VALUERS CERTIFICATION

### ***CERTIFICATION***

We certify that a careful inspection and analysis of data on the subject properties have been made and that all findings, statements and opinions submitted in this report are correct to the best of our knowledge.

We further certify that the appraisal has been made in conformity with the professional standards of the Ghana Institution of Surveyors of which the undersigned is a member of good standing.

We certify that the valuer has no present or contemplated interest in the assets.

In this instance having inspected, examined and analyzed available data it is our considered opinion that the subject properties in their present condition are worth in the amount of **CEDIS** as follows:

### **LAND, BUILDINGS AND INCIDENTAL COSTS OF ACQUISITION**

#### **CAPITAL VALUE**

**ONE MILLION, FOUR HUNDRED AND SEVENTY-THREE THOUSAND, TWENTY GHANA CEDI (GH¢ 1,473,020)**

The breakdown is as follows:

PROPERTY NO.	BRIEF DESCRIPTION	REPLACE. VALUE	INCIDENT. COST	LAND VALUE	PROF. FEES (10%)	ASSESSED VALUE
		GH¢	GH¢	GH¢	GH¢	GH¢
KLF/LVB 1	Single Storey Sandcrete with basement,	29,156	500	3,200	3,286	36,142
	built up to lintel (exclusive of lintel)					
KLF/LVB 2	Single Storey Sandcrete with septic tank,	25,338	500	3,200	2,904	31,942
	built up to lintel (exclusive of lintel)					
KLF/LVB 3	Uncompleted one bedroom with fencewall	8,984	500	3,200	1,268	13,953
KLF/LVB 4	Single Storey Sandcrete with fencewall,	2,820	500	3,200	652	7,172
	built up to lintel (exclusive of lintel)					
KLF/LVB 5	Single Storey Sandcrete with attached shed	451	500	3,200	415	4,566
	and water tank					
KLF/LVB 6	Single Storey Sandcrete with dwarf fence,	2,882	500	3,200	658	7,240
	wall built up to gable level					
KLF/LVB 7	Single Storey Sandcrete with water tank	18,605	500	3,200	2,230	24,535
	built up to window level					
KLF/LVB 8	Single Storey Sandcrete with			3,200		

	basement,	35,236	500		3,894	42,829
	built up to lintel (exclusive of lintel)					
KLF/LVB 9	Single Storey Sandcrete with septic tank,	42,262	500	3,200	4,596	50,559
	built up lintel (exclusive of lintel)					
KLF/LVB 10	Single Storey Sandcrete with one sided fence	12,083	500	3,200	1,578	17,361
	wall, built up to roofing level					
KLF/LVB 11	Single Storey Sandcrete with water tank,	20,544	500	3,200	2,424	26,668
	partl roofed and partly at footing					
KLF/LVB 12	Basement floor and footing with attached	13,702	500	3,200	1,740	19,143
	shed, detached bath room and water					
KLF/LVB 13	Single Storey Sandcrete with detached bath	11,461	500	3,200	1,516	16,678
	room , K.V.I.P. and water tank					
KLF/LVB 14	Single room swish building built up to	1,316	500	3,200	502	5,518
	roofing level					
KLF/LVB 15	Sandcrete block foundation footing without	5,335	500	3,200	904	9,939
	hard core filling					
KLF/LVB 16	Sandcrete block foundation footing without	3,878	500	3,200	758	8,335

	hard core filling					
KLF/LVB 17	Single Storey Sandcrete built up to roofing level and water tank	3,277	500	3,200	698	7,675
KLF/LVB 18	Single Storey Sandcrete built up to roofing level and water tank	3,643	500	3,200	734	8,078
KLF/LVB 19	Single Storey Sandcrete with septic tank, built up lintel (lintel inclusive)	31,699	500	3,200	3,540	38,939
KLF/LVB 20	Single Storey Sandcrete with basement	67,699	500	3,200	7,140	78,539
KLF/LVB 21	Single Storey Sandcrete built up lintel (lintel inclusive)	5,787	500	3,200	949	10,435
KLF/LVB 22	Single Storey Sandcrete with water tank, wall built up to gable level	22,226	500	3,200	2,593	28,519
KLF/LVB 23	About 3 feet high sandcrete block fencewall	2,019	500	3,200	572	6,291
KLF/LVB 24	Wooden kiosk built to roofing level	846	500	3,200	455	5,001
KLF/LVB 25	About 4 feet high sandcrete block fencewall	916	500	3,200	462	5,077

	on 3 sides of a plot					
KLF/LVB 26	Single Storey Sandcrete built up to roofing Level	2,893	500	3,200	659	7,253
KLF/LVB 27	About 3 feet high sandcrete block fencewall on three sides	663	500	3,200	436	4,799
KLF/LVB 28	Single Storey Sandcrete built up to footing Stage	10,408	500	3,200	1,411	15,519
KLF/LVB 29	Single Storey Sandcrete built up to window level without hard core filling	2,843	500	3,200	654	7,197
KLF/LVB 30	Single storey sandcrete block building built up to lintel level	846	500	3,200	455	5,001



KLF/LVB 31	Sandcrete block structure with hard core filling	3,373	500	3,200	707	7,780
KLF/LVB 32	Single Storey Sandcrete with septic tank, built up lintel (lintel inclusive)	30,085	500	3,200	3,378	37,163
KLF/LVB 33	Single Storey Sandcrete block building built up, to the mass concrete floor slab stage	13,716	500	3,200	1,742	19,158
KLF/LVB 34	Single Storey Sandcrete built up to footing stage with hard core filling material	7,569	500	3,200	1,127	12,396
KLF/LVB 35	Single Storey Sandcrete built up to window level without hard core filling	27,105	500	3,200	3,080	33,885
KLF/LVB 36	Single Storey Sandcrete built up to roofing level with water tank	34,529	500	3,200	3,823	42,052
KLF/LVB 37	About 5 feet high sandcrete block fencewall on 2 sides of a plot	1,255	500	3,200	495	5,450
KLF/LVB 38	Single Storey Sandcrete, built up lintel (exclusive of lintel)	807	500	3,200	451	4,957
KLF/LVB 39*						

KLF/LVB 40*						
KLF/LVB 41*						
KLF/LVB 42	Single Storey Sandcrete built up to roofing	3,672	500	3,200	737	8,109
KLF/LVB 43	Two storey sandcrete block built up to gable with 2 sides surrounded by dwarf fence wall	88,205	500	3,200	9,190	101,095
KLF/LVB 44	Single Storey Sandcrete built up to roofing level	2,893	500	3,200	659	7,253
KLF/LVB 45	Single Storey Sandcrete built up to roofing level	1,540	500	3,200	524	5,764
KLF/LVB 46	Single Storey Sandcrete built up to footing Stage	6,328	500	3,200	1,003	11,031
KLF/LVB 47	Single Storey Sandcrete built up to footing stage water tank	12,371	500	3,200	1,607	17,678
KLF/LVB 48	Single Storey Sandcrete built up to roofing level	57,641	500	3,200	6,134	67,475

KLF/LVB 49	Single Storey Sandcrete with attached shed	3,757	500	3,200	746	8,203
	and water tank					
KLF/LVB 50	Single Storey Sandcrete built up to window	948	500	3,200	465	5,112
	Level					
KLF/LVB 51	Single Storey Sandcrete, built up lintel (exclusive of lintel)	914	500	3,200	461	5,075
KLF/LVB 52	Single Storey Sandcrete built up to roofing	6,613	500	3,200	1,031	11,344
	level with mass concrete floor					
KLF/LVB 53	Single Storey Sandcrete built up to foundation	1,985	500	3,200	569	6,254
	footing					
KLF/LVB 54	Single Storey Sandcrete built up to gable level	2,792	500	3,200	649	7,141
KLF/LVB 55	Single Storey Sandcrete built partly to roofing	6,235	500	3,200	994	10,929
	& partly to footing with shed & detech. Bath					
KLF/LVB 56	Single Storey Sandcrete with water tank and	37,299	500	3,200	4,100	45,099
	septic tank					
KLF/LVB 57	Single Storey Sandcrete built up to					

	window	4,856	500	3,200	856	9,412
	Level					
KLF/LVB 58	Single Storey Sandcrete built up to gable level	6,052	500	3,200	975	10,727
KLF/LVB 59	Two storey sandcrete block built up to roofing level with outhouse, septic tank and fence wall	93,268	500	3,200	9,697	106,665
KLF/LVB 60	Wooden structure built up to roofing level	2,508	500	3,200	621	6,829
KLF/LVB 61	Single Storey Sandcrete built up to footing stage with detached roofed wooden structure	12,563	500	3,200	1,626	17,889
KLF/LVB 62	Single Storey Sandcrete built up to roofing Level	2,538	500	3,200	624	6,862
KLF/LVB 63	Single Storey Sandcrete built up to roofing Level	2,538	500	3,200	624	6,862
KLF/LVB 64	Single Storey Sandcrete built up to roofing Level	3,356	500	3,200	706	7,761
KLF/LVB 65	Single Storey Sandcrete built up to window	1,241	500	3,200	494	5,435

	Level					
KLF/LVB 66	Single Storey Sandcrete with hard core filling	9,021	500	3,200	1,272	13,993
	and detached outhouse built up to roofing level					
KLF/LVB 67	Single Storey Sandcrete built up to window	11,387	500	3,200	1,509	16,596
	level but front built to footing without hard core					
KLF/LVB 68	Single Storey Sandcrete building with outhouse,	40,038	500	3,200	4,374	48,112
	septic tank and fenced on all sides					
KLF/LVB 69	Single Storey Sandcrete built up to window	13,623	500	3,200	1,732	19,056
	level with water tank					
KLF/LVB 70	Single Storey Sandcrete built foundation	8,810	500	3,200	1,251	13,761
	footing without hard core filling					
KLF/LVB 71	Sandcretet block water tank	1,128	500	3,200	483	5,311
KLF/LVB 72	Single Storey Sandcrete built up to foundation	8,683	500	3,200	1,238	13,621
	footing level					
KLF/LVB 73	Single Storey Sandcrete built up to foundation	24,996	500	3,200	2,870	31,566

	footing level with water tank					
KLF/LVB 74	Single Storey Sandcrete built up to gable level and fenced on 3 sides	4,903	500	3,200	860	9,463
KLF/LVB 75	Single Storey Sandcrete built up to roofing level and fenced on 3 sides	42,107	500	3,200	4,581	50,388
KLF/LVB 76	Single Storey Sandcrete built up to foundation level and fenced on 3 sides without hardcore filling	33,943	500	3,200	3,764	41,408
<b>TOTAL</b>		<b>1,069,009</b>	<b>36,500</b>	<b>233,600</b>	<b>133,911</b>	<b>1,473,020</b>