GOVERNMENT OF GHANA



MINISTRY OF TOURISM, ARTS AND CULTURE (MoTAC) GHANA TOURISM DEVELOPMENT PROJECT

RENOVATION OF KWAME NKRUMAH MEMORIAL PARK

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

JUNE 2022

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ACRONYMS

AMA Accra Metropolitan Assembly

CNC Computerize Numerical Control

ECG Electricity Company of Ghana

EP Environment Permit

EPA Environmental Protection Agency

ESMF Environmental and Social Management Framework

ESMP Environmental and Social Management Plan

GBV Gender-Based Violence

GMMB Ghana Museums and Monuments Board

GTA Ghana Tourism Authority

GTDP Ghana Tourism Development Project

GWCL Ghana Water Company Limited

KNMP Kwame Nkrumah Memorial Park Project

PHC Population and Housing Census

PWDs Persons With Disabilities

RPF Resettlement Policy Framework

SMEs Small Medium Enterprises

WBG World Bank Group

WBV Whole-Body Vibration

EXECUTIVE SUMMARY

Introduction

The Government of Ghana has received an amount of US\$40 million to implement the Ghana Tourism Development Project (GTDP). The GTDP is being implemented by the Ministry of Tourism, Acts and Culture (MoTAC). The objective of the project is to improve the performance of tourism in targeted destinations in Ghana. The project has four main components as described below:

Component 1: Strengthening Tourism Enabling Environment;

Component 2: Developing Tourism Sites and Destinations;

Component 3: Tourism Enterprise Support Program; and

Component 4: Project Management.

Objectives of the Environmental and Social Management Plan

The objective of the ESMP is to:

- Identify the potential adverse environmental and social risks and impacts associated with the proposed renovation, construction, and operation of the KNMP.
- Provide effective mitigation and sustainable management measures to address the identified risks and impacts.
- Improve upon the positive environmental and social impacts.

Scope of the ESMP

The ESMP covered the following:

- Description of the location of the project;
- Description of project activities and physical works to be undertaken;
- Description of the baseline environmental and social conditions of the project location/Area;
- Description of the potential environmental and social impacts and risks associated with project activities at the preconstruction, construction and operational phases;
- Stakeholder consultations detailing the processes and documentations and correspondence of engagement;
- Mitigation measures to address each of the negative environmental and social impacts and risks identified and the procedures for their implementation;
- Environmental and Social Management Plan (ESMP) which provides the (a) mitigation measures for all the impacts identified, (b) monitoring measures and frequency of monitoring; (c) persons and institutions responsible for the proper implementation of the mitigation measures; and (d) cost of implementing mitigation measures;
- A Grievance Redress Mechanism for addressing grievances from preconstruction, construction to operational phases;
- Annexes: Records of stakeholder engagements: persons engaged, issues discussed, and responses.

Project Location

The project site is located in a built environment in Ghana's capital city of Accra, about 1km westward of the iconic Independence Square. It is bordered on the immediate east by the Centre for National Culture and on the west by the National Service Secretariat. The Atlantic Ocean lies to the south about 300m away. The Atta Mills High Street borders the site to the north with the Accra High Court at the

opposite end of the street. A block of flats used as residences for the Ghana Naval staff is located to the southwest.

Project Description

The main activities of the project are summarized as follows:

CATEGORY	LOCATION	SPECIFIC WORKS
Breaking and Clearing Works	Fence wall; VIP lounge; amphitheatre base; drains and Gift Shop	Removal of deteriorated buildings, road paving and clearing of excess mass. Stockpiling and recycling materials for reuse.
Repair works	Museum, Admin Block, Park and Mausoleum	Careful repair of structural defects on buildings, park paving, road drainage and some artefacts.
Replacement Works	Park and Mausoleum	Carefully provide replacement of failed materials from structural defects on buildings, park paving, road drainage and some artefacts.
Construction Works	Fence wall; VIP lounge; amphitheatre base; drains and Gift Shop	Construction of new buildings and infrastructure.
Landscape	Roads and drainage, signage, parking area, Park and outdoor furniture	Removal of deteriorated walkway paving and introduction of new mass. Introduction of waste management layout, outdoor night and security lighting, safety furniture and irrigation wells.

The park will be opened to the public upon completion and is expected to have a higher patronage by both local and foreign visitors.

Baseline Information

The site for the project is in the jurisdiction of the Accra Metropolitan Assembly (AMA). The Accra Metropolis spans an area of approximately 60 km² and encompasses the Ablekuma South, Ashiedu Keteke, and Okaikoi South Sub-Metropolitan District Councils.

The KNMP employs a total of 16 persons for the administration and operations of the park. The workforce comprises Tour Guides, Administrators, Accounts Officers, Auxiliary Staff and Security.

Legal and Institutional Requirements

The GTDP has been classified as a Category B project and has been prepared in accordance with the World Bank's Environmental and Social requirements and those of the Ghana Environmental Assessment Regulations, LI 1652. The key policies that informed the ESMP are:

World Bank Operational Policies and Bank Procedures

- Environmental Assessment Policy OP 4.01
- Physical and Cultural Resources OP 4.11
- Involuntary Resettlement OP 4.12

National Regulations

- Ghana EPA Act 1994 (Act 490);
- Environmental Assessment Regulations 1999 (LI 1652);

- Fees and Charge (Amendment) Instrument, 2019 (LI 2386);
- Persons with Disability Act 2006 (Act 715);
- National Building Regulations 1996 (LI 1630)

Stakeholder Consultation and Participation

To ensure the inputs of stakeholders in the preparation of the ESMP, all relevant stakeholders were identified and consulted. Consultations were held with the immediate family of Dr. Kwame Nkrumah, neighbouring businesses (Arts Center, National Service Office, craft vendors and squatters living in the vicinity of the project site) also, institutional stakeholders such as the Accra Metropolitan Assembly (AMA), Electricity Company of Ghana (ECG), Ghana Water Company (GWC) and Environmental Protection Agency (EPA). The stakeholders were generally in agreement with the planned project and offered suggestions to make the project successful.

Potential Environmental and Social Impacts

The project will provide benefits for the nation in terms of improving revenue generation from increased tourist visitation. There will be a ripple effect for the communities close to the project as the increased number of persons visiting the KNMP will provide opportunities for local commercial activities. The project holds good prospects for improvement of waste management within the facility and the surroundings.

The potential adverse impacts anticipated to result from project implementation at the preconstruction, construction, and operational phases are

Pre-construction Phase Impacts

- Dust generation from activities associated with setting up the site
- Safety risks from mobilization and setting up of equipment

Construction Phase Impacts

The potential impacts and risks anticipated to be associated with the implementation of works include:

- Potential impacts on physical cultural resources;
- Potential vehicular and traffic impacts;
- Impact from generation of dust;
- Waste generation and disposal;
- Security risks;
- Potential fire risks;
- Noise and vibration impacts;
- Public and occupational health and safety risks;
- Socio--cultural risks and impacts;
- Potential issues on labour, gender and sexual harassment;
- Potential spread of Covid-19 and other communicable diseases; and
- Potential community agitation against the project

Operational Phase Impacts

- Potential sociocultural impacts;
- Potential security risks;
- Potential waste generation and disposal impacts;

Potential issues on labour, gender and persons with disabilities (PWDs).

Environmental and Social Mitigation and Monitoring Plan

Implementation of the ESMP has been estimated at a cost of one hundred and ninety-nine thousand Ghana Cedis (GHC199,000). Assignment of cost has been based on current market estimates of the components that constitute the actions. Some measures developed to address potential adverse impacts are:

Protection and Preservation of Artefacts

Secure all cultural artefacts at the KN Mausoleum away from construction activities and from risk of damage or thievery

Dust Control and Occupational Health and Safety

- Create awareness among workers on the need to ensure their personal safety on site
- Provide all workers with appropriate face masks
- Douse all areas with loose sand before making demarcations

Waste Management

- Engage an approved waste management company to evacuate waste from site during construction
- Segregate waste into reusable and non-reusable components; procure adequate number of wastebins and skips for this purpose and place at vantage points on the facility

Protection of Workers, Gender and PWDs

- Current employees who are all Civil Servants at the park are to be paid full salary throughout the period of the rehabilitation and are expected to return to work after nine (9) months when works are scheduled to be completed.
- Contractor will issue standard contract to all workers, equal opportunity to male and female.
- PWD access-friendly features such as ramps at entrances to all accessible areas of the park, including washrooms will be included in the construction.
- Workers will sign and abide by a code of conduct which prescribes good behaviour and guards against violence, sexual abuse and discrimination among workers at the work site.

ESMP Implementation Arrangement

The entities to be involved in the implementation of the ESMP are:

- PCU of the Ghana Tourism Development Project
- The works contractor
- World Bank's Environmental and Social Safeguards Team
 Management Board of the renovated KNMP
- Environmental Protection Agency
- Waste Contractors

1.0 INTRODUCTION

1.1 Background

The Government of Ghana has received an amount of US\$40 million to implement the Ghana Tourism Development Project (GTDP). The objective of the project is to improve the performance of tourism in targeted destinations in Ghana.

The project aims to promote the tourism sector, especially the leisure segment, which has been rated uncompetitive because of the high costs of doing business, relatively high transaction costs, low diversification, weak links to the local economy, low capacities, difficult access to finance, and a high-risk perception for investing in the sector. The project will seek to remove these constraints and sustain improvements to the business enabling environment to help both domestic and international firms grow their operations. It will also seek to enhance the tourism sector's offerings, diversify its impact, and enable wider participation in the tourism value chain.

The expected outcomes include greater private sector investment, an increase in leisure visitors both international and domestic tourists, longer lengths of stay, increased domestic benefits from tourism, and increased visitor satisfaction with quality and diversity of products. The GTDP will also support the Small Medium Enterprises (SMEs) sector and women-led enterprises to provide demand-driven services for tourism.

The project has four main components as described below:

Component 1: Strengthening Tourism Enabling Environment: This component aims to address the following tourism enabling constraints which are most likely to have transformative impact on the tourism sector in Ghana: training and skills development of the industry, branding and marketing.

Component 2: Developing Tourism Sites and Destinations: This seeks to diversify the leisure tourism offering in Ghana by identifying and upgrading the most promising destination areas. These are sites that show significant public goods requirements and circuit-tourism potential and can draw increased demand from both domestic and international visitors.

Component 3: Tourism Enterprise Support Program: This components objective is to provide tourism SMEs with opportunity to improve their business planning, formalize their business, and apply for matching grants to upgrade their tourism products and services. This component will finance the costs of tourism enterprise matching grants and business development services and training, and will also target women owned SMEs

Component 4: Project Management: The component will provide support to MoTAC to manage and coordinate the project.

1.2 Project Justification

Tourism provides an important source of foreign exchange, contributing to the government's tax revenues and enabling economic growth. According to the Ghana Tourism Authority (GTA), international tourist arrivals rose from 580,000 in 2007 to 980,141 in 2017, though driven primarily by the growth of business tourism. International tourism receipts also increased from \$879 million in 2007 to \$1,800 million in 2017 with tourists spending on average \$1,892 per visit in 2017. Tourism, especially high-end leisure and ecotourism is already having a positive impact on jobs and community income around the parks (such as

Kakum and Mole), and has demonstrated economic benefits for Ghana's coastal areas, such as Elmina and Takoradi. Furthermore, because tourism depends on good environmental health and sanitation, the sector has provided positive externalities for communities living in destination areas currently challenged by sanitation issues.

Ghana's ability to transform the leisure tourism segment depends on its ability to create an enabling environment to crowd-in private sector investment, and thus maximize finance for development. This can ensure that scarce public resources are used efficiently on priorities for which private sector finance is unreachable. Many of the required destination-level investments are public goods, which single, private investors could not justify without additional support or financing. Creating an enabling environment will also include generating a skilled workforce, promoting the country as a tourism destination, and improving basic access, safety, and sanitation. Currently, weak branding and market promotion, and degrading tourism assets and poor infrastructure are holding back private investment in the leisure segment. This project is expected to catalyze private sector engagement in tourism. The goal is to de-risk the sector by addressing major constraints in tourism's enabling environment (under component 1); improving the quality of sites and destinations and enabling private development, management, and financing of these sites through matching grants (under component 2); and supporting private solutions to innovation and creativity within the sector (under component 3).

The Ministry of Tourism and Culture intends to apply part of the project funds for the rehabilitation on the KNMP. The works will involve breaking and expansion of portions of existing structures within the park and construction of new structures, refurbishment of some existing infrastructure as well as construction of new building units.

An Environmental and Social Management Framework (ESMF) and a Resettlement Policy Framework (RPF) as well as national policies guide the management of environmental and social safeguard issues of projects funded by the GTDP. The guidance is meant to prevent, where possible, and effectively mitigate and manage environmental and social risks and impacts that may arise from implementation of projects funded under GTDP. This therefore makes it imperative for the Ministry to prepare and implement the Environmental and Social Management Plan (ESMP).

1.3 Objectives of the Environmental and Social Management Plan

The ESMP provides the blueprint for planning and implementation of mitigation, monitoring and management activities associated with good environmental and social practices to safeguard the KNMP project. The ESMP has been prepared in compliance with the legal and regulatory requirements of the World Bank Group (WBG) and the Ghana Environmental Protection Agency (EPA).

The objective of the ESMP is to provide effective mitigation and sustainable management measures to address the potential adverse environmental and social risks and impacts associated with the proposed renovation, construction and operation of the KNMP in order to improve upon the positive environmental and social impacts.

The specific objectives are to:

• Identify the environmental and social impacts that will arise from project execution;

- Propose mitigation and management measures; and
- Provide Environmental and Social Management Plan (ESMP), which defines specific actions for mitigations, appropriate, monitoring indicators, frequency of monitoring, person(s) responsible for the task and costs. Describe monitoring requirements associated with the implementation of mitigation actions;
- Describe the roles and responsibilities of parties involved (e.g., within the client organisation, designers, contractors and operators) in administering the various actions;
- Describe the timescale of implementation of mitigation and monitoring measures for the environmental and social safeguard actions; and
- Estimate the cost of implementing and monitoring environmental and social actions.
- Conduct a census survey of displaced persons and valuation of assets, which involved carrying
 out a socio-economic census and survey of affected people and assets as well as identifying
 different types of impacts and establishing cut-off dates, and methods for the valuation of assets
 and livelihoods, etc.
- Description and a matrix of compensation and other resettlement assistance to be provided, including the type of compensation to be paid to the different affected people, assets, livelihoods, temporary or permanent relocation, etc.
- Existing legal and policy framework for ESMP and differences between National and World Bank policies, describing applicable and relevant legal and policy issues for the ESMP.
- Provide institutional arrangements and consultations with affected people and other relevant stakeholders
- Development of mechanisms for addressing grievances, describing a grievance redress system that will allow aggrieved persons to seek for redress should they have any issues.

1.4 Scope of the ESMP

The ESMP covered the following:

- Description of the location of the project;
- Description of project activities and physical works to be undertaken;
- Description of the baseline environmental and social conditions in each of the Accra Metropolitan Area;
- Description of the potential environmental and social impacts and risks associated with project activities at the preconstruction, construction and operational phases
- Stakeholder consultations detailing the processes and documentations, and correspondence of engagement;
- Mitigation measures to address each of the negative environmental and social impacts and risks identified and the procedures for their implementation.
- Environmental and Social Management Plan (ESMP) which provides the (a) mitigation measures for all the impacts identified, (b) monitoring measures and frequency of monitoring; (c) persons and institutions responsible for the proper implementation of the mitigation measures; and (d) cost of implementing mitigation measures.
- Annexes: Records of stakeholder engagements: persons engaged, issues discussed, and responses

2.0 DESCRIPTION OF THE KWAME NKRUMAH MEMORIAL PARK PROJECT

The project involves renovation of the KNMP and will entail breaking and expansion of portions of existing structures within the park and construction of new structures. refurbishment of some existing infrastructure as well as construction of new building units. The project, which occupies an area of approximately 6.7 acres will have structures including a new VIP lounge, and a renovated mausoleum and museum and a mural walk. There will be a reception and resource area and a restaurant with up to a total of 16 washrooms located at various areas of the park. There will be revamping of an existing sewer system and of existing water and electricity systems works.

2.1 Project Location

The project site is located in a built environment in Ghana's capital city of Accra, about 1km westward of the iconic Independence Square. It is bordered on the immediate east by the Centre for National Culture (Arts Center) and on the west by the National Service Secretariat. The Atlantic Ocean lies to the south about 300m away. The Atta Mills High Street borders the site to the north with the Accra High Court at the opposite end of the street. A block of flats used as residences for the Ghana Naval staff is located to the southwest. Figure 2.1 is an aerial map of the location of the site.



Figure 2. 1 Aerial View of the Project Site

2.1.1 Pre-construction Phase

There will be notification of immediate adjoining neighbours prior to start of construction works. This will come as a follow up to initial consultations that have been held with these stakeholders at project inception and during project designing.

The layout and survey benchmarking of the site extents would be pegged. The zones for waste stock piling, transport routes, fire assembly points, hoardings, site office, welfare shelters, access points etc. would all be created. It is assumed that the same layout would serve for the second phase of construction which is the actual building of the structure. All buried services that fall directly within zoned setups will be earmarked for rerouting and immediate attention before main works. Construction equipment and machinery as well as the workforce will be mobilized.

2.1.2 Construction Phase

Works to be undertaken have been grouped into the following categories:

Restoration works

• Replacement works

• Demolishing and clearing

• Construction works

• Repair works

• Landscape works

Details of works under each category and the section of the park that works will be executed are elaborated in Table 2.1.

Table 2. 1 Construction and Renovation Works

CATEGORY	LOCATION	SPECIFIC WORKS	
Breaking and Clearing Works	Fence wall; VIP lounge; amphitheatre base; drains and gift shop	Removal of deteriorated buildings, road paving and clearing of excess mass. Stockpiling and recycling materials for reuse.	
Repair works	Museum, Admin Block, Park and Mausoleum	Careful repair of Structural defects on buildings, park paving, road drainage and some artefacts.	
Replacement Works	Park and Mausoleum	Careful provide replacement of failed materials from Structural defects on buildings, park paving, road drainage and some artefacts.	
Construction Works	Fence wall; VIP lounge; amphitheatre base; drains and gift shop	Construction of new buildings and infrastructure.	
Landscape	Roads and drainage, signage, parking area, park and outdoor furniture	Removal of deteriorated walkway paving and introduction of new mass. Introduction of waste management layout, outdoor night and security lighting, safety furniture and irrigation wells.	

2.1.3 Operational Phase

The intended use of the project is tourism and recreation with the 2019 estimated tourist throughput of 8,167 persons a month (98,000 persons a year) expected to increase when the park is reopened after the renovation works. The Park infrastructure would afford its patrons a wider range of recreational activities such as the opportunity to dine, longer site-seeing sessions and more comprehensive narrative about

Ghanaian culture and history. The block plan and schematic drawings of structures are shown in Figures 2.2 and 2.3 respectively.

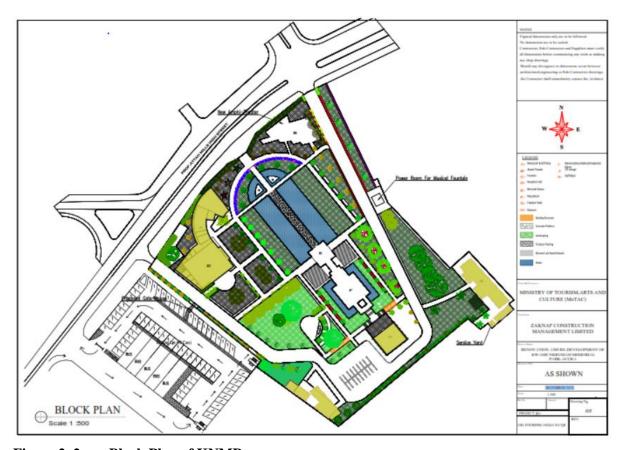


Figure 2. 2 Block Plan of KNMP



Figure 2. 3 Schematic Presentation of Structures

3.0 ENVIRONMENTAL AND SOCIAL BASELINE

3.1 The Project Area

The site for the project is in the jurisdiction of the Accra Metropolitan Assembly (AMA). The Accra Metropolitan spans an area of approximately 60 km² and encompasses the Ablekuma South, Ashiedu Keteke, and Okaikoi South sub-metropolitan district councils. The district was established by the Local Government Act of 1993 (Act 462) and Legislative Instrument 1615. Since 1961, the district has been coterminous with the City of Accra, which also serves as its capital. Figure 3.1 is a map showing AMA and adjoining districts.

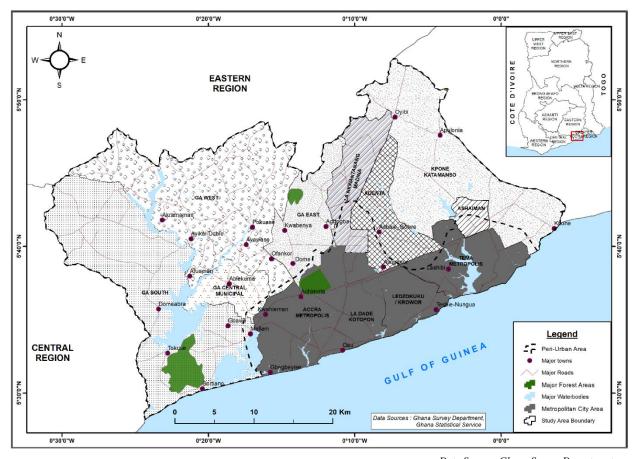


Figure 3. 1 Map of Accra Metropolitan Area

Data Source: Ghana Survey Department

The population of AMA area, according to the 2021 Population and Housing Census (PHC) is 284,124. Males constitute 47.2 percent and females represent 52.8 percent (2021 Population and Housing Census).

3.2 Vegetation Cover

The Metropolitan area comprises three broad vegetation zones: mainly shrubland, grassland and coastal lands. Shrublands is the most common vegetation type occurring in the western part of the region all the way northwards towards Aburi. The coastal zone comprises of two vegetation types, wetland, and dunes. Mangroves, comprising of two dominant species, are found in the tidal zone of all estuaries sand lagoons.

Salt tolerant grass species cover substantial low-lying areas surrounding the lagoons. There are a few wetlands and water bodies which create microclimates in some parts of the Metropolitan Area. However, the original vegetation of the Metropolitan Area has been altered in the more recent past century by climatic and human factors.

3.3 Baseline Conditions of the Project Site

The site for the KNMP Renovation Project is a brownfield with existing infrastructure on a defined area of land measuring approximately 6.7 acres within a built-up area. A 6-foot cement block wall marks the entire perimeter of the site with an entrance and exit gates located at the 2 extreme corners to the north of the site. There is security-controlled entry and exit points at the western end of the site for visitors and vehicles that patronize the park. The Park is not a public thoroughfare; other than for persons (tourists) who are visiting the park and who have undergone the necessary clearance by the park security.

3.3.1 Neighbouring Activities

The site is bordered on the immediate east by the Centre for National Culture (Arts Centre) and on the west by the National Service Secretariat premises. The Atlantic Ocean lies to the south about 300m away. The Atta Mills High Street borders the site to the north with the Accra High Court at the opposite end of the street. A block of flats used as residences for the Ghana Naval staff is located to the southwest. An area of about 50m^2 bordering the perimeter fence to the west is used as controlled parking space by the AMA.

There is a community of squatters to the south-east of the site behind the Arts Centre. Persons from this area engage in petty trading in the commercial areas of the Accra Central Business District usually vending craft wares, sachet water, coconuts, soft drinks, food, and confectionery.

3.3.2 Census and Socio-survey of Project Affected Persons (PAPs)

A socio-economic survey was conducted, and a cut of date opened from 3rd to 17th January, 2022. At the close of the cut-off date, there were project-affected persons (PAPs) on site. All potential PAPs were persons and institutions proximate to the project site who will neither be physically or economically displaced. Rather the renovation of the park will improve their trade through increased patronage of the KNMP. There will not be compensation and resettlement assistance since no one will be physically or economically displaced as a result of the execution of this project.

3.3.3 Staff Strength of KNMP

The KNMP employs a total of 16 persons comprising eight (8) men and eight (8) women for the administration and operations of the park. The workforce comprises Tour Guides, Administrators, Accounts Officers, Auxiliary Staff and Security. All staff are Civil Servants paid by the Ghana Government. A breakdown of the workforce categories and numbers are shown in Table 3.1.

Table 3. 1 Staff Strength of Kwame Nkrumah Memorial Park

Job Designation	Number of Staff
 Tour guides (Museum educators) 	4
Administration	4
Accounts	3
Groundsmen (Auxiliary staff) and Security	5
TOTAL	16

3.3.4 Flora and Fauna

All trees at the site were planted for purposes of landscaping and beautification. Stands of pine trees (*Pinus radiata and Pinus pinaster*) dominate the existing tree planting. Other species are tree of life (*Kalanchoe pinnata*) and the whistling pine tree (*Casuarina equisetifolia*). Some domesticated peacocks are also kept at the site.

4.0 LEGAL AND INSTITUTIONAL REQUIREMENTS

4.1 World Bank Operational Policies and Bank Procedures

The World Bank Group (WBG) Safeguards Operational Policies (OP) and Bank Procedures provide guidance and standards for developing and implementing environmental and social safeguards for development projects. The main Operational Policies are as shown in Table 4.1:

Table 4. 1 World Bank Operational Policies

World Bank Requirements			
Environmental	Requires among others that screening for potential impacts is carried out early,		
Assessment (OP 4.01)	in order to determine the level of Environmental Assessment (EA) to assess and		
,	mitigate potential adverse impacts. Projects are grouped under three categories:		
	A - Detailed Environmental Assessment		
	B – Initial Environmental Examination		
	C – Environmentally Friendly		
Involuntary Resettlement	Assists people displaced by development projects, in order not to impoverish any		
(OP 4.12)	affected people within the area of influence of projects. An action plan that at		
	least restores the standard of living must be instituted, in cases where		
	resettlement is inevitable or loss of assets and impacts on livelihood occurs.		
Forestry (OP 4.36)	Enhancing the environmental and social contribution of forested areas, and the		
	need to reduce deforestation.		
Physical Cultural	Premised on the need to investigate and take inventory of cultural resources		
Property (OP 4. 11)	likely to be affected. Mitigations are provided for in cases of adverse impacts on		
	physical cultural resources.		
Natural Habitats (OP	Recognizes that the conservation of natural habitats is essential for long-term		
4.04)	sustainable development. The Bank, therefore, supports the protection,		
	maintenance, and rehabilitation of natural habitats in its project financing.		
Safety of Dams (OP 4.37)	Seeks to ensure that appropriate measures are taken, and sufficient resources		
	provided for the safety of dams financed by the Bank, which distinguishes		
	between small and large dams, and the policy is triggered for large dams.		
Indigenous People (OP	Objective is to ensure: (i) that the development process encourages full respect		
4.10)	of dignity, human rights, and cultural features of indigenous people; (ii) they do		
	not suffer from the detrimental effects during the development process; and (iii)		
	indigenous people reap economic and social advantages compatible with their		
	culture.		
Bank's Policy on	Requires that all the people residing in the given areas of a project have the right		
Disclosure (OP 17.50)	to be informed of the proposed development project.		

The GTDP has been classified as a Category B project and the same classification holds for the KNMP Project. Given the types of works to be undertaken and the project site being a brownfield in a built-up area, the following OPs are triggered:

- Environmental Assessment Policy OP 4.01
- Involuntary Resettlement OP 4.12
- Physical and Cultural Resources OP 4.11

4.2 National Regulations

4.2.1 Ghana EPA Act 1999 (Act 490)

The Act grants the EPA enforcement and standard setting powers, and the power to ensure compliance with such standards and guidelines. The Act also mandates the EPA to ensure compliance with the Ghana EA requirements and procedures. Additionally, the Agency is required to create environmental awareness and build environmental capacity in all sectors. The requirement for an ESMP for this project takes its root from the Act.

4.2.2 Environmental Assessment Regulations 1999 (LI 1652)

The regulations prohibit commencing an "undertaking without prior registration and environmental permit (EP). "Undertaking" according to the LI 1652 means any activity, scheme of development, construction, project, structure, building, work, investment, plan, programme and any modification, extension, abandonment, demolition, rehabilitation or decommissioning of such undertaking, the implementation of which may have a significant impact. Undertakings are grouped into schedules for ease of screening and registration, and for environmental permit. The schedules include undertakings requiring registration and environmental permit (Schedule 1), EIA mandatory undertakings (schedule 2), as well as Schedule 5-relevant undertakings (located in environmentally sensitive areas).

4.2.3 Fees and Charge (Amendment) Instrument, 2019 (LI 2386)

The Fees and Charges (Amendment) Instrument, 2019 (LI 2386) sets out the fee regime for processing and environmental permits, associated with the Environmental Assessment Regulations. Permit requirements of the EPA for the KNMP Project will be fulfilled in line with this law.

4.2.4 Persons with Disability Act, 2006 (Act 715)

The Persons with Disability Act, 2006 (Act 715) provides certain rights to protect persons with disability. The Act states that a person or an employer shall not:

- Discriminate against or subject a person with disability to degrading treatment;
- Call a person with disability derogatory names;
- Discriminate against a prospective employee or an employee on grounds of disability; and
- Post a person with disability to a section of the establishment not suited for the person.

The Act further provides that a person who employs a person with disability shall provide the relevant working tools, and the appropriate facilities required for the efficient performance of the functions.

4.2.5 National Building Regulations, 1996 (LI 1630)

The National Building Regulations, 1996 (LI 1630) make it an offence for any individual to undertake any development without the acquisition of a Building Permit from the appropriate authority. This ensures that buildings are well planned and are in conformity with the Assembly's plan designs of an area. The KNMP will acquire the requisite development permit from AMA to ensure that the activities are in conformity with the Assembly's standards for such a facility.

Other social sector policies which may be relied on in the implementation of the ESMP are highlighted in Table 4.2.

 Table 4. 2
 List of Ghana Social Sector Policies

-	And Health Requirements
Factories, Offices and Shops Act, 1970, Act 328	Employment and Social Welfare to register factories and ensure that internationally accepted standards of providing safety, health and welfare of persons are adhered to.
Occupational Safety and Health Policy of Ghana (Draft), 2004	Prevents accidents and injuries arising out of or linked with or occurring in the course of work, by minimizing, 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'. Derived from provisions of the International Labour Organization (ILO) Conventions 155 and 161.
National Workplace HIV and Aids Policy 2013	Among others, provides protection from discrimination in the workplace to persons living with HIV and AIDS; prevents HIV and AIDS spread amongst workers; and provides care, support and counselling for those infected and affected.
Labour Act, 2003 (Act 651)	Amends and consolidates existing laws relating to labour, employers, trade unions and industrial relations. Provides for the rights and duties of employers and workers; legal or illegal strikes; guarantees trade unions and freedom of associations and establishes the Labour Commission to mediate and act in respect of all labour issues.
National Development Po	licy Frameworks
The Ghana Shared Growth and Development Agenda (GSGDA), 2010-2013	Ensures and sustains macroeconomic stability, enhanced competitiveness of Ghana's private sector, accelerated agricultural modernisation and natural resource management, oil and gas development, infrastructure and human settlement development, human development, employment and productivity and transparent and accountable governance.
Ghana Poverty Reduction Strategy (GPRS I), 2003-2005	Facilitates macro-economic stability, sustainable growth and poverty reduction (2003-2005) through a comprehensive framework of policies and development strategies, programs and projects.
Growth and Poverty Reduction Strategy (GPRS II), 2006-2009	Emphasizes the implementation of growth-inducing policies and programs with the potential to support wealth creation and sustainable poverty reduction. Refers to the need to apply environmental impact assessment and environmental audit to ensure that the growth arising from the GPRS is environmentally sustainable.
National Environmental Sanitation Policy, 2010	Describes the objectives of environmental sanitation to include developing a clean, safe and pleasant physical environment in all human settlements, promoting the social, economic and physical well-being of all sections of the population. Comprises of various activities including the construction and maintenance of sanitary infrastructure, provision of services, public education, community and individual action, regulation and legislation.
National Land and Prope	rty Acquisition, Ownership and Compensation
Constitution of the Republic of Ghana (Article 20 of the 1992 Constitution)	The Constitution of Ghana is the supreme law of Ghana and any other law found to be inconsistent with any provision of the Constitution shall to the extent of the inconsistency, be void.
State Lands Act, 2020 (Act 1036)	The Act's stated object is to ensure sustainable land administration and management, and effective and efficient land tenure. It seeks to achieve this by, inter alia, establishing a broad-based framework for registering land rights and interests, a customary land rights framework and enhancing transparency and accountability in land governance institutions.

Administration of Lands Act, 1962 (Act 123)	An act to consolidate with amendments the enactments relating to the administration of Stool and other lands.		
(Act 125)			
Lands (Statutory Way	An Act to provide for entry on any land for the purpose of the construction,		
Leaves) Act, 1963	installation and maintenance of works of public utility, and for the creation of		
(Act186)	rights of way and other similar rights in respect of such works and for purposes		
	connected with the matters aforesaid.		

5.0 STAKEHOLDER CONSULTATION AND PARTICIPATION

To ensure the inputs of stakeholders in the preparation of the ESMP, all relevant stakeholders were identified and consulted. Consultations were held with key stakeholders such as the daughter of Dr. Kwame Nkrumah, Hon. Samia Nkrumah on behalf of the nuclear family, residents occupying a residential block southwest of the site, the Accra Metropolitan Assembly, Urban Roads, Environmental Protection Agency, Ghana Fire Service, utility providers such as Electricity Company, Ghana Water Company Limited, Parks and Gardens, implementing Agencies of the GTDP i.e., GMMB, GTA and Forestry Commission.

Other stakeholders consulted were traders and managers of the Art Center, management and workers of the park, engineering consultants, among others. This was to provide opportunity for the stakeholders to express their opinions about the scope of work to be carried out, including the potential environmental and socio-economic impacts. Feedback from the consultations were considered in the estimation of impacts and development of mitigation measures. The outcomes of consultations are summarised in Table 5.1 whereas the full consultation report is presented in Annex 1.

Table 5. 1 Consultation Outcomes

Stakeholder	Consultation Outcomes and suggestions	Contact Details
Family of Dr. Kwame Nkrumah	· ·	
(Nuclear family)	Park.	Nkrumah 0544351022
(Nuclear family)	2. There is need for an Iconic Library to commemorate Dr. Nkrumah.	0344331022
	3. Upgrade the Museum to include digitisation, videos, sound,	
	/music and speeches of Dr. Nkrumah.	
	4. Willing to help solicit for funding if need be.	
	5. Suggestion to look at a Public, Private Partnership venture	
	to run the park in the future	
Neighbours to the K		
Director, CNC,	1. Structure of the admin block at the Park does not befit the	Mrs. Alice Alima
Accra	Status of the KNMP	Kala, CNC (Arts
	2. The rehabilitation of the KNMP is laudable, since it has	Centre).
	special interest in culture; and even introduced Culture studies	Mob:
	at UG, Legon	0240865183
	2. Squatters and craft sellers occupy make-shift structure, which can pose security risk to the KNMP	
	3. There are a lot of unemployed youth around the Centre,	
	especially girls. Rehabilitation and operation of the centre	
	could provide jobs to these youth	
Curator, CNC,	1. Squatters and mentally challenged persons who loiter in the	Mr. Kizito Nii
Accra	vicinity of the park pose security risk and poor sanitation to	Armaah Amartey.
	the park	Mob:
	2. There should a well-defined access to the park	0243753851
	3. The perimeter wall should be made higher and more	
	attractive	

Stakeholder	Consultation Outcomes and suggestions	Contact Details
Northern Smock Seller, CNC	1. The perimeter wall to the park should be properly built and raised to keep criminals from jumping from the CNC to the Park	Mr Jalil Mob: 0265188960
Resident, Naval Quarters	 More flowers should be planted to make the Park more beautiful and attractive Should consider introducing popcorn machines as children patronise the Park a lot There should be bars and restaurants for visitors The KNMP administrators should consider a link with the Navy (detachment) to beef up security and to combat any potential terrorist threats. An escape exit gate through the military zone could be an added advantage to safety of the visitors and workers at the Park Wondered whether the security cameras on the Park had any monitoring room Establishing a bookshop and library should be considered 	Chief Petty Officer Class 1 (CPO 1) Taylor Patrick. Mob: 0552895925
Chief Inspector, Accra Community Centre	 The staff of the Centre is ready to help in every way possible Security to the place is assured; even at weekends, since there is always security presence at the Centre 24/7 	Mrs Christiana Dampare. Mob: 0244765613
Institutional Stakeho		0211703013
Accra Metropolitan Assembly	The mayor was very much in favour of the project and acknowledged that the timing of the project is good. He opined that there would be an increase in revenue generation once the park gets a facelift. He indicated that the Assembly will support the project in terms of facilitation of water supply, electricity and assistance in waste management and sanitation. The mayor suggested that the new features of the project should be designed to blend in with the Marine Drive Project which was also being designed at the time	Mr. Mohammed Nii Adjei- Sowah – Mayor of Accra
Environmental Protection Agency of Ghana	The EPA advised that efforts should be made to acquire EPA Permit so that the Permit Conditions will guide the work during the construction and operational stages. Also, if there are trees to fell, EPA should be contacted for trained officers to undertake that exercise without any negative effect to the environment and the construction workers.	Emmanuel Ameyaw – EA Department 0507327731
Electricity Company of Ghana (ECG)	ECG is able to assist when design is complete and ready with all indicative additional load(s) from the new development additions.	General Manager, (Regional Office - Accra East)

Stakeholder	Consultation Outcomes and suggestions	Contact Details
Ghana Water Company Limited (GWCL)	GWCL will assist the KNMP project engineers with technical advice on the revamping of the water system and installation. The following were also provided 1. A 10-inch Pipeline is connected (teed) to a 6-inch pipeline to the park. 2. Fire hydrant line is available and separate from the line feeding the Park. 3. The water infrastructure is in the area adequate to supply any volume of water but the quantity for distribution is limited, hence the rationing. 4. GWCL is ready to assist KNMP to change the entire piping system from the steel lines to modern and new HDPE piping system.	Ing. Paul Akpanya (Regional Distribution Engineer)
Craft vendors	 We are ready to partner and collaborate with KNMP and other stakeholders in presenting unique Ghanaian Culture at the Park Increased number of tourists will mean increased patronage of the crafts at the centre since tourists visit the CNC when they move from the KNMP Project implementation will not involve relocation of crafts workers; 	Mr. Kizito Nii Armaah Amartey. Mob: 0243753851
Squatters and hawkers	 Since the project does not involve clearing of our houses, as was the case for the Marine Drive Project, we are fine Increased number of visitors to the site will increase patronage of our wares and improve our sales The entrance to the project site is away from our houses so we don't think there will be issues of blocking access to our houses It will help improve environmental conditions around the park, especially at the front gate area. (Further details of consultation outcomes with squatters are given in Annex 1) 	Asare Samuel (0544086906) Stephen Esson (0595462964) Matilda Sackey (0246677610) Salamatu Yakubu (0594437849
Staff of the Park	1. Expressed joy that the Park will be rehabilitated because it is long overdue, and the facilities are running down 2. It will increase the satisfaction of tourists and increase the number of tourists who visit the Park since some complain about poor waste management and empty souvenir shop 3. Whether staff would be paid during the rehabilitation work	Edmund Quao, Human Resource Mob: 0547681686

6.0 POTENTIAL ENVIRONMENTAL AND SOCIAL IMPACTS

The project will provide benefits for the nation in terms of improving revenue generation from increased tourist visitation. There will be a ripple effect for the communities close to the project as the increased number of persons visiting the KNMP will provide opportunities for local commercial activities. The project holds good prospects for improvement of waste management within the facility and the surroundings.

Some potential adverse impacts are anticipated to result from project implementation at the preconstruction, construction, and operational phases.

6.1 Pre-construction Phase Impacts

Activities at the pre-construction phase would be associated with:

- 1. Dust generation from activities associated with setting up the site
- 2. Safety risks from mobilization and setting up of equipment

The activities to be undertaken prior to the start of construction such as mobilization of equipment and mapping out of could result in generation of and inhalation of dust; with workers partaking in the activity being the ones affected. Workers could be exposed to safety risks such as tripping over objects at the site and slips and falls. These potential risks are not considered as significant.

6.2 Construction Phase Impacts

The potential adverse impacts and risks anticipated to be associated with the implementation of works include:

- 1. Potential impacts on physical cultural resources;
- 2. Potential vehicular and traffic impacts;
- 3. Impact from generation of dust;
- 4. Waste generation and disposal;
- 5. Security risks;
- 6. Potential fire risks;
- 7. Noise and vibration impacts;
- 8. Public and occupational health and safety risks;
- 9. Socio-economic/ Socio-cultural risks and impacts;
- 10. Potential issues on labour and gender;
- 11. Potential spread of Covid-19 and other communicable diseases; and
- 12. Potential community and worker grievances

6.2.1 Impacts on Squatters and Neighbouring Businesses

The project is not anticipated to impact negatively on the squatter community close to the project site. The construction activities will not involve relocation or resettlement of any person or business. No new access will be created to the site; the existing access and exit gates at the sites will be used during the construction period. The car park on the west of the site will not be blocked off and will remain accessible

to public use. The potential impacts of dust and noise on residents in the accommodation for Naval Staff will be adequately mitigated as shown in Chapter 7 of this report.

6.3 Operational Phase Impacts

The impacts expected to be associated with the operational phase are:

- 1. Potential sociocultural impacts;
- 2. Potential security risks;
- 3. Potential waste generation and disposal impacts;
- 4. Potential issues on labour, gender, and persons with disability (PWDs)

A significant increase in the numbers of foreign tourists might present an issue of potential negative cultural influence on the people in the project communities; namely: James Town and Osu. Cultures foreign to the local communities may present opportunities for learning but may also involve practices and beliefs which may not conform to those of the local.

The park could be targeted by thieves and other miscreants due to increased patronage by foreign nationals. Such miscreants could rob victims of money or other valuables. This potential risk is considered as significant.

Labour issues might arise at the operational phase of the project with issues such as not issuing workers with standard contracts, delay of payment of workers' salaries, child labour, and workplace sexual harassment.

6.4 Evaluation of Significance of Impacts

The impacts associated with the implementation of the KNMP are classified on a 3-tier scale; that is High, Moderate and Low. The classification is to afford any person using the ESMP an overview of the severity and extent of the impacts at face value. The scale is elaborated as follows:

- High impact: the effects on environmental and social milieu, including people are extensive and difficult to mitigate or reduce
- Moderate impact: effects on the environment and people are extensive but can be reduced through specific mitigation measures
- Low impact: there is manifestation of effects on the environment and people, but these are such as may not require application of mitigation measures.

Table 6.1 gives an overview of the potential manifestation of the main impacts of the project and the sensitive receptors.

 Table 6. 1
 Potential Environmental and Social Impacts

Impact	Manifestation/ Effects	Recipients/ Sensitive	Significance		
		Receptors			
Pre-Construction Phase					
1. Dust	Dust blow-ups during site demarcations to	Construction	Low: dust spread		
generation	accommodate various activities at	workers	will be localized		
	construction. Inhalation of dust can lead to		and can be		
	upper respiratory tract infections among the		adequately		
	workers		mitigated with PPE		
			and dousing		
2. Health and	Risk of injury from trips and fall during	Construction	Low: site		
safety risks	mobilization and setting of the construction	workers	mobilization		
	site		expected to involve		
			only a few persons		
Construction Pl	hase				
1.Potential	Risk of damaging artefacts of cultural and	Memory of Dr.	Moderate		
impacts on	historical significance regarding the memory	Kwame Nkrumah			
physical	of Dr. Kwame Nkrumah at the mausoleum	KNMP as a whole			
cultural	during construction. Such loss or damage				
resources	could take from the richness of the history and				
	life of the person in whose honour the park				
	was created				
2. Vehicular	Movement of haulage trucks carting	Road users on the	Moderate		
and traffic	construction materials to site could add to	Atta Mills			
impacts	traffic congestion on the Atta Mills Highway	Highway			
	Risk of collision between construction	Commuters moving			
	vehicles moving from site to join traffic on	to and from the			
	Atta Mills Highway	Central Business			
		District			
3. Dust	The presence of dust particles in the	General	Moderate		
generation	atmosphere would be a nuisance for people	public/commuters			
	living or commuting close to the construction	Facilities/buildings			
	site. Impact could be significant given the	in the surroundings			
	high number of commuters that use the	of the project site			
	roadside pavement of the Atta Mills Highway	such as the			
	that abuts a section of the KNMP	residences of the			
	Dust generated from construction activities	Ghana Naval staff,			
	could settle on walls and roofs of buildings in	Centre for National			
	the project's surroundings, e.g., and mar the	Culture and the			
	aesthetics.	National Service			
		Secretariat			
4. Waste	Potential improper disposal of domestic	Sensitive receptors	Moderate		

Impact	Manifestation/ Effects	Recipients/	Significance
		Sensitive	
		Receptors	
Generation and	waste, excavated spoil, broken pieces of	e.g., river banks,	
disposal	concrete, tiles, glass, wood, metal scrap,	seashore, drains	
	plastic and packaging material as well as left	The KNMP	
	over paints and other flammable liquids	premises	
	resulting from the construction activities		
	Likelihood of workers engaging in open		
	urination or defaecation during construction		
	Potential breakdown of solid and liquid waste		
	management during operations given the		
5 C	expected high patronage of the park	Canton of anylonais of	Moderate
5. Security	Workers smuggling various items out of the	Contractor/project	Moderate
risks	site during construction especially after close	client	
	of work	Patrons of the park	
6. Fire risks	Fires could result from construction activities	Construction	Moderate
	if proper fire safety measures are not	workers	
	observed, e.g. improper use/storage of	Damage to	
	solvents, in-situ refuelling of machinery on	machinery and	
	site	equipment	
		Facilities at the	
		KNMP	
		Patrons of the park	_
7. Noise and	Potential exceedance of tolerant noise levels	Workers	Low
vibration	of 70dBA from machinery use for persons	Commuters	
	close to construction activities	walking close to	
	Impact would not be significant for persons in	the KNMP site	
	the Naval Officers' accommodation as they are about 50m away		
	Noise impacts would not be significant as		
	there are no noise-sensitive receptacles		
	(schools, hospitals etc.) within 100m of the		
	project site		
	Potential exceedance of tolerable whole-body		
	vibration (WBV) limits for workers using		
	vibrating equipment		
8. Public and	Potential accidents and injuries from	Construction	Low
occupational	equipment/machinery failure, poor	workers	
health and	housekeeping, poor site traffic control	General public	
safety	Potential injury to commuters close to the side	_	
	of the park		
9. Socio-	Project is in a built-up area with the	KNMP facility	Moderate

Impact	Manifestation/ Effects	Recipients/	Significance
		Sensitive Receptors	
cultural risks	inhabitants of the closest communities e.g.	Inhabitants of	
and impacts	James Town community to the west of the site	communities close	
	and Osu community to the east most likely	to the project	
	already exposed to the dynamics of modern	(James Town, Osu	
	day developments. In this regard minimal	communities)	
	impact is anticipated with regards to issues		
	such as construction workers influencing		
	community folk with money to engage in		
	vices such as random casual sex with its		
	associated adverse effects		
	Risk of negative foreign cultural influence on		
	local inhabitants during the operational phase		
	of the project as a lot of foreign nationals		
	would be patronizing the park and interacting		
	with local folk		
10. Potential	Existing staff at the KNMP will not have to	16 Current workers	Moderate
labour issues	go to the KNMP to work once the site is	of the park	
	temporarily shut down for the works. This		
	presents a concern that they might lose their	Construction	
	livelihoods	workers	
	Potential breach of Ghana Labour Law and		
	international labour requirements by	Female employees	
	discriminating against women in engaging	Women looking for	
	workers for the project	employment	
	Workplace sexual harassment and Gender-		
	Based Violence (GBV) among workers		
11. Potential	Potential spread of Covid-19 at the	Construction	Moderate
spread of	construction site due to non-vaccination,	workers	
Covid-19 and	ignorance of the disease among workers,	General public	
other	worker apathy towards observation of		
communicable	prevention protocols, lack of prevention and		
diseases	control measures on site	G	*
12. Potential	Complaints and potential agitation against the	Contractor and	Low -
community	project by people within the vicinity of the	workers	the project will not
grievances	project		involve relocation
			of any person and
			measures will be
			put in place to
			minimize impacts
			of the project such
			as dust and public

Impact	Manifestation/ Effects	Recipients/	Significance
		Sensitive	
		Receptors	
			safety
Operational Pha	ase Impacts		
1. Impacts on	An increase in the numbers of foreign tourists	People in the James	Moderate
physical	might present an issue of potential negative	Town and Osu	
cultural	cultural influence on the people in the project	communities	
resources	communities; namely: James Town and Osu.		
	Cultures foreign to the local communities may		
	present opportunities for learning but may		
	also involve practices and beliefs which may		
	not conform to those of the local.		
2. Security	Thieves and miscreants may target the Park	Tourists	Moderate
risks	and tourists due to the high numbers and	The Park	
	increased activities. Tourists could be robbed		
	of their possessions. The image of the park		
	could be tarnished and could affect patronage		
3. Potential	Labour issues could arise when the process of	Workers	Moderate
issues on	employment of the work force does not		
labour, gender	conform to the requirements of the Ghana	PWDs who visit	
and persons	Labour Law and international labour	the facility	
with disabilities	regulations. Child labour, discrimination		
(PWDs)	against women and Gender-based Violence		
	(GBV) and Persons with Disabilities (PWDs)		
	during employment, issuance of sub-standard		
	contracts to workers, delay or non-payment of		
	worker salaries are issues that might come up		

7.0 ENVIRONMENTAL AND SOCIAL MITIGATION AND MONITORING PLAN

Implementation of the ESMP has been estimated at a cost of one hundred and ninety-nine thousand Ghana Cedis (GHC199,000). Assignment of cost has been based on current market estimates of the components that constitute the actions. The budget for actions applicable to the construction phase of the project has been based on a 9-month period, being the estimated time for completion of construction activities.

7.1 Grievance Redress Mechanism

An important requirement of an ESMP is to implement an efficient and effective Grievance Redress Mechanism (GRM) which will allow aggrieved individuals and affected communities to receive information about the project and to convey their complaints for redress. The setup for receiving and addressing grievances for this project entails the following:

7.1.1 Avenues for Reporting Grievances

The following avenues will be available for workers as well as the public to lodge their issues regarding the implementation of the KNMP project:

- Face to face reporting: A grievance desk will be set up at the project site where people can walk in (after the necessary safety and security checks by site personnel) to discuss any issues they may have with assigned personnel of the Contractor;
- The contractor's assigned personnel's telephone number and e-mail address (Grace Korkor Ohene Social Expert, 0241978017, email address ehs@awaconghana.com) will be displayed within and outside the site for persons with grievances to lodge their issues;
- Complaint register forms will be placed at the site where stakeholders can complete and submit for redress;
- GTDP telephone and WhatsApp Helplines (0307007100/0579579019) will be displayed at areas easily accessible to the public to enable stakeholders call in to lodge concerns or make recommendations. The numbers will be managed by assigned personnel at a call center.

7.1.2 Grievance Resolution Arrangement

The Contractor will deal with grievances at the site as his/her jurisdiction would allow. If a grievance is beyond the Contractor's capacity however, the issue is to be referred to the GTDP E&S Safeguards Consultants. If the issue is of such magnitude as is beyond the capacity of the Safeguards Consultants, it will be escalated to the Project Coordinator of the GTDP for redress as appropriate.

The Contractor will provide a remedy for a reported grievance no more than 3 working days from the day the grievance is reported. Should the issue require escalation, the total period from lodging a grievance to its resolution will be within 10 working days. A complainant may seek legal redress if they are not satisfied with the resolution to their grievance provided by the project's GRM.

7.2 Arrangements for Staff of KNMP

The 16 staff of the KNMP made up of eight (8) men and women (8) will be paid their monthly salaries for the 9-month period of rehabilitation. All staff are expected to return to work after nine (9) months. There

has been a meeting between Management of KNMP and the workers to discuss this arrangement and a memorandum has been signed between Management and staff to this effect. A copy of the signed memorandum is shown at Annex 2.

7.3 Environmental and Social Mitigation and Monitoring Measures

The plan details mitigation and monitoring measures to be applied at the pre-construction, construction, and operational phases. The actions to be implemented to manage the environmental and social impacts of the KNMP Renovation Project are presented in Table 7.1.

Pre-Construction Phase

- 1. Dust control
- 2. Occupational health and safety measures

Construction Phase

- 1. Protection and preservation of artefacts;
- 2. Accident prevention and traffic control;
- 3. Dust control plan;
- 4. Waste management measures;
- 5. Security safeguard measures;
- 6. Fire prevention and control;
- 7. Noise and vibration control plan;
- 8. Public and occupational health and safety plan;
- 9. Socio-cultural risks and impacts management;
- 10. Worker protection measures;
- 11. Covid-19 management plan; and
- 12. Grievance redress mechanism

Operational Phase

- 1. Preserving ethical values of project communities;
- 2. Waste management measures;
- 3. Security safeguard measures;
- 4. Worker, gender and PWDs protection measures;
- 5. Grievance redress mechanism

Table 7. 1 Environmental and Social Mitigation and Monitoring Plan

Mitigation measures	Monitoring Parameters	Frequency	Responsibility	Budget (GHC)
Preconstruction Phase				
Dust generation				
1. Provide all workers with	Check to ensure workers are	Daily		5,000
appropriate PPE (face	in face masks	-		

Mitigation measures	Monitoring Parameters	Frequency	Responsibility	Budget (GHC)
masks)			Contractor's HSE Officer	
2. Douse all areas with loose sand before making demarcations	Inspect the designated areas have been doused	Daily		5,000
Occupational health and saf		T.		
1. Create awareness among workers on the need to ensure their personal safety on site	Inspect records of toolbox talks held with workers	Weekly	Contractor's HSE Officer	-
2. Ensure proper housekeeping on site; avoid haphazard arrangement of equipment and items	Inspect visually that site is properly organized.	Daily	Contractor's HSE Officer	-
Construction Phase				
Protection and Preservation	of Artefacts			
1. Secure all cultural artefacts at the KN Mausoleum away from construction activities and from risk of damage or thievery	Supervise handling (or movement) and safe storage of cultural artefacts	Once	Contractor	5,000
Accident Prevention and Tra	uffic Management	I		
1. Schedule construction material haulage for off- peak traffic periods (10.00hrs-15.00hrs) on Atta Mills Highway	Keep and inspect logbooks for material transport by construction vehicles	Daily	Contractor's Site Engineer	-
2. Position 2 traffic wardens at the entrance of the site to coordinate construction vehicle movement from the site unto the Atta Mills Highway and vice versa	Visual inspection of the presence of the wardens	Daily	Contractor's HSE Officer	18,000
3. Provide adequate reflective warning signs at site entrance	Visual inspection to confirm signs are in place	Daily	Contractor's HSE Officer	5,000
Sub-total		1		38,000
Dust Control Measures				
1. Provide all workers on site with PPEs including standard safety nose masks and eye goggles during construction	Check and insist on the use of nose masks and eye goggles	Daily	Contractor's HSE Officer	5,000
2. Douse all areas on and	Facilitate dousing to ensure	Daily	Contractor's	5,000

Mitigation measures	Monitoring Parameters	Frequency	Responsibility	Budget (GHC)
close to site accessed by project-associated haulage trucks at least once a day	it is done		Site Engineer	
3. Provide tarpaulin and require its use for all trucks carting sand and stone aggregates	Conduct impromptu checks on vehicles carting raw materials to the site for use of tarpaulin	Weekly	Community Liaison Officer	10,000
Sub-total				20,000
Waste Management		T		1
Engage an approved waste management company to evacuate waste from site during construction	Supervise the removal of any piled-up waste on the facility prior to commencement of construction Supervise timeliness and consistency of collection of waste	Weekly	Contractor HSE Officer	5,000
2. Segregate waste into reusable and non-reusable components; procure adequate number of wastebins and skips for this purpose and place at vantage points on the facility	Supervise proper maintenance of waste bins and skips and timely evacuation	Daily	HSE Officer	5,000
Sub-total				10,000
Security Safeguard Measure		T	1	1
1. Reinforce perimeter fence wall to secure the site. Increase the height of the perimeter fence from 5ft to 9ft to prevent miscreants scaling over the wall into the premises	Perimeter fence wall repaired and reinforced, and height of the fence increased to 9ft	Once	Contractor	Part of project cost
2. Engage a registered security company to man entrance of site at construction and operational phases	Supervise performance of security guards	Daily	HSE Officer	24,000
3. Provide identification for all workers engaged on the project to be used as passes to the site during construction Sub-total	Supervise security guards' consistent checking of id cards at site entrance and routine checks of workers after close of work	Daily	HSE Officer	4,000 28,000
Sub total	<u>l</u>			20,000

Mitigation measures	Monitoring Parameters	Frequency	Responsibility	Budget (GHC)
Fire Prevention and Control		•	•	,
1. Keep well maintained fire extinguishers at designated points on site and train personnel on how to use them	Validity of fire extinguishers	Periodically	HSE Officer	4,000
2. Implement the recommendations of the GNFS following their evaluation of fire risks of the facility	Compliance inspection of facility premises by GNFS	Twice yearly	Management Board of the renovated KNMP	4,000
Sub-total				8,000
Noise and Vibration Control				
1. Provide earplugs/muffs for workers on site	All workers must use ear plugs/muffs as necessary	Daily		2,000
2. Enforce time limits for workers working on/with vibrating equipment	Records of time durations per work shift done by vibratory machinery operators	Daily	HSE Officer	-
Sub-total		•	1	2,000
Public and Occupational He	alth and Safety			<u>, , , , , , , , , , , , , , , , , , , </u>
1. Sensitize workers via toolbox talks on the various aspects of safety to be observed at the construction site	Workers observing site safety protocols	Daily	HSE Officer	-
Construct a 9-foot solid wood or zinc sheets safety barrier on the side of the facility that abuts public walkways	Safety barrier in place	Once	Contractor	3,000
Sub-total		•	1	3,000
Sociocultural Impacts Mana	gement			•
1. A Grievance Redress Mechanism will be provided for addressing public and worker grievances which should include a contact number displayed visibly on the	Supervise the proper functioning the Grievance Mechanism	Throughout the life of the project	Contractor PCU Safeguards Consultants	-
project premises				
Labour Issues				
1. All 16 workers at the park will be paid full salary throughout the break in work period. All workers will resume once the park is operational	Confirmation by workers of their monthly payments	Monthly	HSE Officer PCU Safeguards Consultants	Salaries of KNMP staff are borne by the Government of Ghana

Monitoring Parameters	Frequency	Responsibility	Budget (GHC)
Contractor's compliance with terms of the contract	Monthly	HSE Officer	-
Inspect PWD accessibility features constructed	Monthly	HSE Officer	Part of project cost
Inspect signed code of conduct The Diseases Management	Monthly	HSE Officer	-
Observation of all Covid-19 protocols on site	Daily	Contractor	10,000
Worker's attendance of sensitization meetings	Monthly	Contractor	-
			10,000
		Las	
Successfully organized sensitization sessions Completion and review	Twice yearly	Management Board of the renovated KNMP	10,000
	Contractor's compliance with terms of the contract Inspect PWD accessibility features constructed Inspect signed code of conduct Diseases Management Observation of all Covid-19 protocols on site Worker's attendance of sensitization meetings Project Communities Successfully organized	Contractor's compliance with terms of the contract Inspect PWD accessibility features constructed Inspect signed code of conduct Monthly Monthly Monthly Monthly Monthly Monthly Monthly Diseases Management Observation of all Covid-19 protocols on site Worker's attendance of sensitization meetings Monthly Project Communities Successfully organized sensitization sessions Twice yearly	Contractor's compliance with terms of the contract Inspect PWD accessibility features constructed Inspect signed code of conduct Monthly HSE Officer Inspect signed code of conduct Monthly HSE Officer Daily Contractor Worker's attendance of sensitization meetings Monthly Contractor Project Communities Successfully organized sensitization sessions Twice yearly Management Board of the renovated KNMP

Mitigation measures	Monitoring Parameters	Frequency	Responsibility	Budget (GHC)
AMA in developing a community enhancement programme for the neighbouring communities to be implemented when the park is operational	programme for community enhancement		Board of the renovated KNMP	
3. Promote community participation; Conduct meaningful consultation and engagement	Records of organization and attendance of contractor's engagement with representatives of the nearby community and businesses	Quarterly	Management Board of the renovated KNMP	_
Waste Management Measure				•
1. Engage an approved waste management company to evacuate waste from site during operation	All waste piles removed from in and around the facility prior to commencement of construction	Weekly	Management Board of the renovated KNMP	5,000
	Timeliness and consistency of collection of waste			
2. Construct adequate number of toilets to be able to accommodate and manage the significant domestic sewage (blackwater) during operations	Incorporate toilet unit at design phase of the project	Once	Contractor	Part of project cost-
3. Segregate waste into reusable and non-reusable components; procure adequate number of wastebins and skips for this purpose and place at vantage points on the facility	Supervise proper waste segregation and maintenance of waste bins and skips and timely evacuation	Daily	HSE Officer	5,000
Sub-Total				20,000
1. Engage a registered security company to man entrance of site at construction and operational phases	Supervise performance of security guards	Daily	HSE Officer	36,000
Sub-Total		ı	•	36,000
Protection for workers, Ger		Γ -	T	ı
1. All 16 employees who will break from work at the construction phase will	All 16 staff confirmed to have resumed work at operational phase	Once	KNMP Management	-

Mitigation measures	Monitoring Parameters	Frequency	Responsibility	Budget (GHC)
resume work at the park.				
2. Workers will sign a code of conduct, committing to be of good behaviour	Inspect signed copies of code of conduct	Monthly	KNMP Management	-
3. Tour Guides will be oriented to aid PWDs when they need it	Observe good work etiquette with Tour Guides	Daily	KNMP Management	-
4. A functioning GRM will be in place, accessible to all workers to lodge any grievance	 GRM system in place and functioning Records of grievances lodged and follow up measures 	Monthly	KNMP ManagementPCU Safeguards Consultants	24,000
Sub-Total		•	•	24,000
Total				199,000

8.0 IMPLEMENTATION OF THE ESMP

8.1 Roles and Responsibilities

The roles and responsibilities of parties involved in the project are highlighted in Table 8.1.

Table 8. 1 Roles and Responsibilities

Party	Responsibilities
PCU of the Ghana	Overall coordination of project construction activities;
Tourism	Responsible for oversight of implementation of environmental and social
Development Project	safeguard actions of the ESMP
	Provide backstopping for the activities of the contractor's Health, Safety,
	Social and Environment (HSSE) team;
	Responsible for coordination with local (Ghana EPA) and external (World
	Bank Group) institutions regarding all HSSE reporting requirements
Contractor	Engineering design drafting for earthworks, civil works, structural works,
	etc.;
	Construction management including site management, control and inspection
	of all construction activities, and safety management;
	The contractor will appoint an HSSE Team to implement the ESMP for the
	construction phase
Waste Contractors	Responsible to the collection and disposal of wastes to appropriate disposal
	facilities. The contractors must abide by the standards specified within this
	ESMP
EPA	• Ensure that monitoring and reporting requirements (as required by the ESMP
	are in accordance with EPA standards and guidelines).
World Bank's	The E&S Safeguards Team will work with the PCU Safeguards Team to
Environmental and	oversee the exhaustive implementation of mitigation measures in the ESMP
Social Safeguards	
Team	
Management Board	Will oversee the implementation of ESMP actions at the operational phase
of the renovated	
KNMP	

8.2 Training

Training of construction and operational workforce will be undertaken to ensure they can safely and effectively carry out the actions required by the ESMP. The contractor and key staff will be given an orientation by the GTDP Environmental and Social Safeguards Consultants on the ESMP. Actions in the ESMP will be transcribed into toolbox bulletins for workers at the construction phase. At the operational phase, the actions will be disseminated through awareness creation for the workforce in the form of morning huddles, toolbox talks and periodic worker training. Training records will be kept for reference and appraisal purposes.

8.3 Audit and Inspections

Complementary to the monitoring measures outlined in the preceding chapter, the GTDP E&S Safeguards Team will undertake internal audits during each project phase to ascertain the contractor's compliance with the required environmental and social mitigation actions and to ensure that the requirements of the ESMP are being undertaken in full. The frequency of the audits will vary depending on the nature of activities. External audits and inspections by regulating authorities (e.g. the EPA) or the World Bank E&S Team may also be undertaken throughout the duration of the project.

8.4 Reporting

Reporting of monitoring undertaken must be submitted to the relevant organisation(s), that is the World Bank and Ghana EPA in accordance with the requirements of these institutions.

8.5 Ghana EPA Permitting and Reporting Requirements

An Environmental Permit will be secured for the project from EPA in compliance with Ghana Environmental Assessment Regulations. The cost of permit and other procedures are subject to the EPA's internal regulations and the Fees and Charges (Amendment) Instrument, 2015 (LI 2228). The project will comply with all of the Agency's requirements that will be issued in the Permit Schedule.

REFERENCES

https://en.wikipedia.org/wiki/Accra_Metropolitan_District

Ghana Statistical Services 2021; Population and Housing Census – Data Extract – Accra Metropolitan

Ghana Survey Department; Map of the Accra Metropolitan Area

ANNEXES

ANNEX 1
Outcome of Stakeholder Engagements

NO.	STAKEHOLDERS	CONCERNS, SUGGESTIONS & INTERVENTIONS	CONTACT DETAILS
1	Dr. Kwame Nkrumah's Family	a) She was concerned about the lack of maintenance of the Memorial Park.	Madam Samia Nkrumah
	(06 July 2021)	b) The need for an Iconic Library to commemorate Dr. Nkrumah.	
		c) Upgrade the Museum to include digitisation, videos, sound,/music and speeches	
		of Dr. Nkrumah.	
		d) She thinks that, she could help to solicit for funding if need be.	
		e) She thinks that the survival of the Memorial park could also depend on making	
		it a Public, Private Partnership venture.	
2	(Ghana Socialist Forum)	a) He said that it was about time that the Park is given a new life.	Mr. Justice Akuffo
		b) He wanted the Park to tell the Dr. Nkrumah's story. And also the story of those	Freedom Bookshop, Asylum
		who fought with him, which he dubbed as "the Ghana Story"	Down, Accra
		c) He emphasised the training of the Tour Guides.	Ph: 024 437 3622
		d). There should be electronic interactions.	
		e) Suggested the inclusion of films to show t visuals of Dr. Nkrumah.	
		f) The Museum should affect the Art Centre (Acquiring Artefacts from the Art	
		Centre).	
		g) They should be a chronological story line of his life, (from birth to Death).	
		h). He agreed that the Park, especially, the Gift shop should generate revenue.	
3	Tourism Society of Ghana	a) He suggested the need to include a restaurant or Canteen.	Mr. Joseph Armartey
	(TOSOGHA	b). He suggested the need for Play-ground for kids.	(President)
	Youth Tourism Ambassador)	c). Should make it a "One Stop Shop" i.e. Site seeing, Learning, Purchase of gifts,	Tel: 0244 927 017
		Eatery etc.	27/07/2021
		d) Museum should be enlarged to provide a set-up that would tell story.	Art Centre Accra (Ph: 024 492
		e) Provide more sitting area (Garden Seats) for visitors	7017)
		f) The Museum Setup should be enlarged to accommodate a good number of	
		visitors at a time.	
		g) Train the Tour Guides h) The Myseum should have a better story telling	
		h) The Museum should have a better story telling.i) Allow some of Nkrumah's stories to be inscribed on posters and placed around	
4	Prof. Agyeman Badu Akosah,	the Park for people to read. He proposed the following:	Prof. Agyeman Badu Akosah,
*	(Nkrumaist)	a) The park should be alive with 'Life' speeches/voice recording of Dr. Nkrumah	(Nkrumaist)
	(14Ki uilidist)	on hourly basis within the Park premises.	(1 VKI umaist)
		b) Not a bad idea to publish Nkrumah's books right here at the park.	
		c) Videos of his motivational speeches and stories that tell of his struggles should	
		be made available at the Museum for learning.	
		be made available at the Museum for learning.	

		d) This Park or facility should be made as a Pan-African learning centre. e) Books for learning should include that of other Pan-Africanists. f) Revenue generation for the park should come from: • sale of Books	
		• Guest slotting in money to listen to voice of Nkrumah g) The provision of Amphitheatre to exhibit Ghanaian culture through drama such	
	Ghana Water Company Limited	as: (Highlife, Wulome and other cultural groups; He Confirmed the following:	In a Devil Almanus (Designal
5	(GWCL)	a) A 10-inch Pipeline is connected (teed) to a 6-inch pipeline to the Park.b) Fire hydrant line is available and separate from the line feeding the Park.	Ing. Paul Akpanya (Regional Distribution Engineer)
		c). Flow of water to the Park is best at Wednesdays and Sundays only. But minimal on other days of the week.	
		d) No immediate plans to upgrade the water system in the High Street area. e) The water infrastructure is in the area adequate to supply any volume of water	
		but the quantity for distribution is limited, hence the rationing.	
		g) GWCL is ready to assist KNMP to change the entire piping system from the	
		steel lines to modern and new HDPE piping system.	
		h) GWCL can expand their scope to ensure good distribution of water within the Memorial Park.	
		j) Concerning alternative means of providing BOREHOLES he states that: Due to	
		treatment of desalination and its attendant costs, GWCL can connect a parallel line	
		into a 50 to 100 cubic metre storage tank enough to supply water to the entire Park	
		to last about a week.	
		k) Promised to be available for further clarification and discussions.	
6	Electricity Company of Ghana(ECG)	III. manufacility of the tr	General Manager, (Regional Office
		He promised that: They will assist when design is complete and ready with all indicative additional	-Accra East)
		load(s) from the new development additions.	
7	Tour Operators Union of Ghana	Suggestions are:	Mr Alisa Osei Asamoah
		a) KNMP should provide a restaurant in order to bring in visitors and maintain	(President) & Mrs. Yvonne
		them,	Donkor (Secretary)
		b) Improve night life.	22 July 2021
		c) Create recreational facilities to invite more youth in the Park.	
8	Ghana Tourism Federation	d) Upgrade the washroom facilities and improve sanitation at the park	Mrs. Bella Ahu (President).
0	(GHATOF)	GHATOF Concerns and Suggestions as follows:	Mrs. Stella Apenteng (IMC
	29 July 2021	a) Suggests that, there is the need to ascertain the decline of the Memorial Park. Is	Member).
	,	it managerial incompetence or lack of funding, they demanded.	
		b) Concerned about the physical ambience of the Park. They thought that	
		something was not right, especially the condition of the grass was not good	

d) They addition present e) They the lawn f) They them, then, then, the main Park. h) They j) They k) They continen Nmeda, l) The P wedding m) The attract vertical attract vertical them is a struct of the continent of the continent in the conti	suggested the replacement or introduction of "Carpet grass" type. The suggested again the introduction of "Coastal Climate Resistant Plants" in the to Colourful Exotic Floral plants because they are disappointed with the landscape of the Park. Were disappointed to see washed clothing, including under pants left on ans. Were unhappy to see that the Fountains were not functioning. According to the fountains must be made to work to add value and attraction to the Park. Were unhappy that the private transport operators (Trotro) are impeding an entrance of the Park causing nuisance and discomfort for visitors to the suggested the introduction of playground area for children. Suggested the establishment of a Cafeteria or Restaurant to serve both antal and local dishes with local drinks such as Cocoa drinks, Sobolo, Asana, Palm wine, etc. Park should provide a place to host functions (such as Modelling and Grad ags. To boost income or revenue. finally suggested the free provision of Wifi to visitors if they want to	1. Asare Samuel (0544086906) 2. Stephen Esson (0595462964) 3. Matilda Sackey (0246677610) 4. Salamatu Yakubu (0594437849) 5. Fusena Seidu (0543776991) 6. Elvis Donkor (0595462964) 7. Collins Ofosu (0595462964) 8. Amponsah Isaac (0249332299) 9. Bright Marah (0555502579) 10. Bobby Smith (0553858360) 11. Gabriel Sunkanmi (0544759065) 12. Chibueze Jonathan 13. Chimonso Bobby (0553858360) 14. Evidence Endurance (0579221335) 15. Ogechi Vital (0234782967)







Pictures of consultation with squatters and sellers

ANNEX 2 Memorandum- Staff and Management of KNMP

KWAME NKRUMAH MEMORIAL PARK

In case of reply, the number

and date of this letter should be quoted

KNMP/A.1/2022/12

Our Ref:

Your Ref:

DATE: MAY 14 2022

THE SAFEGUARD CONSTULTANT GTDP, ACCRA

Dear Sir/Madam,

MEETING BETWEEN MANAGEMENT AND STAFF ON THE IMPENDING REHABILITATION WORKS TO BE CARRIED OUT UNDER GTDP

Please find attached a memo on the above subject matter.

Thankyou.

Yours faithfully,

Alhaji Abubakari Issah Osman (Director)

MEMORANDUM

FROM

MANAGEMENT

TO

ALL STAFF

DATE

MAY 12,2022

SUBJECT

MEETING WITH STAFF ON REHABILITATION WORKS TO BE

CARRIED OUT UNDER GTDP

Following series of engagements between the Ministry of Tourism, Arts and Culture (MOTAC), the Project Coordinating Unit (PCU) of the Ghana Tourism Development Project and the Management of Kwame Nkrumah Memorial Park (KNMP) to apply part of the GTDP funds to rehabilitate the KNMP, Management had a meeting with staff to discuss the scope of work with them, how long the rehabilitation works will last, the fate of Management and staff during the period of work regarding remuneration and any other matters relevant to staff welfare.

At the meeting held on May 10, 2022 at the Director's Office, the Management and staff discussed the abovementioned topics and resolved that:

- 1. The rehabilitation works will take nine (9) months to complete. Accordingly, work is expected to commence in July /August 2022 and end in March/April 2023.
- Since all the 16 staff are government employees and are on Government of Ghana payroll, during the rehabilitation, the Management and staff will riot be required to go to KNMP to work. However, while at home, their salaries will be fully paid by government every month;
- No staff will be laid off; all of them are expected to return to work after completion of the rehabilitation.
- 4. Where there is to be a delay in the course of the execution of the project, staff will be consulted and a decision will be taken accordingly;
- Staff who are interested to work as casual workers could submit their names to the Director, KNMP for onward submission to the contractor for consideration. However, Management made it clear that, it was not a right or mandatory for the contractor to employ staff since the Park will be closed to the public and special job skills and knowledge will be required. But if there is any opportunity, they would be considered accordingly.
- 6. During execution of the project, if staff need information relating the work or have concerns or any recommendations, they should not hesitate to contact the Director of KNMP on Telephone no. 0208283175 / 0268283175.

It is important to note that, the staff strength of KNMP is 16. This comprise of 8 woman and 8 men. There is one (1) Director and three (3) Administrators, four (4) Curators, three (3) Accounts Officers, Five (5) Auxiliary staff including two (2) Security guards.

Sign WAS ASubakaw, I. Os Ma,	Sign Award Quill
(on behalf of Management	(on behalf of Management

Sign MARLS	Sign S care	Si-
Name Mario Nyarko	Name Souts Ascotos	Name AZAARE
(on behalf of staff)	(on behalf of staff)	(on behalf of staff)