

RESETTLEMENT ACTION PLAN (RAP) AND LIVELIHOOD RESTORATION PLAN

UNDER THE PROJECT

**CONSTRUCTION AND OPERATION OF A SOURCE-SEPARATED ORGANIC WASTE
COMPOSTING PLANT, JAMESTOWN, ACCRA**



DATE: 30TH APRIL 2026
PROPONENT: ACCRA METROPOLITAN ASSEMBLY (AMA)

DECLARATION

This RAP/LRP commits the Project Proponent to:

- Restore and improve livelihoods of economically displaced persons
- Implement a transparent and accessible Grievance Redress Mechanism (GRM)
- Ensure inclusive participation, particularly of vulnerable groups
- Undertake monitoring, evaluation, and completion audit in line with AfDB OS5

APPROVAL & SIGN-OFF PAGE

This Resettlement Action Plan (RAP) and Livelihood Restoration Plan (LRP) for the Construction and Operation of the Source-Separated Organic Waste Composting Plant in Jamestown, Accra has been prepared in accordance with the applicable laws of the Republic of Ghana and requirements of the African Development Bank (AfDB) Integrated Safeguards System (ISS, 2023), specifically Operational Safeguard 5 (OS5). The RAP/LRP has been reviewed and approved by the relevant institutions and represents a commitment to ensure that all Project Affected Persons (PAPs) are treated fairly, compensated at full replacement cost, and supported to restore or improve their livelihoods.

Prepared by
ESG Partners Limited
Environmental and Social Consultancy Firm

ACRONYMS AND ABBREVIATIONS

Acronym	Full Meaning
AFDB	African Development Bank
AMA	Accra Metropolitan Assembly
Aol	Area of Influence
CBD	Central Business District
CGSC	Community Grievance and Surveillance Committees
CSIR	Council for Scientific and Industrial Research
CSO	Civil Society Organization
DOVVSU	Domestic Violence and Victims Support Unit
EOI	Expression of Interest
EPA	Environmental Protection Authority
ESG	Environmental Social Governance
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESPA	Environmental Service Providers Association
GARCC	Greater Accra Regional Coordinating Council
GBV	Gender-Based Violence
GIZ	Deutsche Gesellschaft für Internationale Zusammenarbeit
GNFS	Ghana National Fire Service
GPS	Global Positioning System
GRM	Grievance Redress Mechanism
GSS	Ghana Statistical Service
ICGC	International Central Gospel Church
IFC	International Finance Corporation
IRECOP	Integrated Recycling and Compost Plant Limited
ISP	Informal Service Providers

ISS	Integrated Safeguards System (AfDB, 2023)
KBTH	Korle-Bu Teaching Hospital
KPI	Key Performance Indicators
LI	Legislative Instrument
LRP	Livelihood Restoration Plan
MMDA	Metropolitan, Municipal and District Assemblies
MSW	Municipal Solid Waste
NGO	Non-Governmental Organization
OS	Operational Safeguard 5 (Land Acquisition, Restrictions on Land Use and Involuntary Resettlement)
PAP	Project Affected Person
PCU	Project Coordination Unit
PRCC	Public Relations and Complaints Committee
PWD	Persons with Disabilities
RAP	Resettlement Action Plan
RBF	Results-Based Financing
SEA	Sexual Exploitation and Abuse / Sexual Harassment
SH	Sexual Harassment
SMS	Short Message Service
SOP	Standard Operating Procedures
SWCES	Single Window Citizen Engagement Service
ToR	Terms of Reference
USD	United States Dollars
WRI	Water Research Institute

GLOSSARY OF KEY TERMS

This glossary defines key terms used in this RAP/LRP in line with AfDB Operational Safeguard 5 (OS5) and international good practice. It ensures clarity, consistency, and shared understanding among all stakeholders involved in RAP implementation.

Term	Definition	Application in this RAP
Project Affected Persons (PAPs)	Individuals, households, or groups affected by the project through loss of assets, access, or livelihoods, regardless of legal land tenure status.	Includes scrap dealers, waste pickers, informal workers, and support-service providers operating on the AMA site.
Economic Displacement	Loss of income sources or livelihood due to project impacts such as land use change or restricted access to resources.	Primary impact of the project, affecting informal waste-sector actors reliant on site-based activities and waste streams.
Physical Displacement	Loss of shelter or relocation resulting from project activities.	Limited to temporary and semi-permanent structures such as sheds, kiosks, and containers.
Replacement Cost	The full cost of replacing an asset without depreciation, including materials, labour, transport, and transaction costs.	Used for compensating affected structures to ensure PAPs can rebuild without financial loss.
Cut-off Date	The date after which new occupants or activities are not eligible for relocation or assistance.	Established during the census, publicly disclosed, and enforced to prevent opportunistic claims.
Livelihood	Measures to ensure PAPs restore or	Includes relocation support,

Restoration	improve income and living standards after displacement.	business re-establishment, skills training, and market linkages.
Entitlement	The relocation and assistance package a PAP is eligible for based on impact type and category.	Defined in the Entitlement Matrix covering structures, relocation, and livelihood support.
Vulnerable Groups	Individuals or groups with limited capacity to cope with displacement impacts.	Not formally identified in census, but contingency provisions exist for emerging vulnerability cases.
Grievance Redress Mechanism (GRM)	A structured system for receiving, addressing, and resolving complaints.	Multi-tiered system ensuring accessible, transparent, and timely dispute resolution.
Area of Influence (Aoi)	The geographic area affected by the project, directly or indirectly.	Includes project footprint and surrounding areas impacted by livelihood disruption and waste value chain changes.
Livelihood Restoration Plan (LRP)	A structured plan to restore or improve livelihoods of PAPs.	Focuses on economic recovery through relocation, integration, and business support.
Full Replacement Cost Principle	Compensation standard requiring full asset replacement without depreciation.	Applied to all compensable structures under this RAP.
Completion Audit	Independent evaluation confirming RAP implementation outcomes.	Verifies relocation, and livelihood restoration effectiveness.
Resettlement Action Plan	A plan outlining measures to address displacement impacts.	Provides framework for relocation, livelihood

(RAP)		restoration, and monitoring.
Informal Occupants	Individuals using land without legal title but with established economic activity.	Scrap dealers and operators on AMA land qualify under this category.
Business Inventory	Goods or materials used for income generation.	Scrap materials are treated as business inventory and relocated, not cash compensated.
Transitional Support	Temporary assistance provided during disruption periods.	Triggered if relocation is delayed beyond six months.
Stakeholder Engagement	Ongoing consultation and communication with affected and interested parties.	Ensures PAP participation in planning, implementation, and monitoring.
Relocation Site	Designated alternative location for PAPs.	Must be prepared, serviced, and operational before displacement.
Compensation	Payment or in-kind support for loss of assets.	Applies to structures and verified relocation-related damages.
In-kind Compensation	Non-cash compensation such as provision of replacement structures or land.	AMA may construct replacement structures instead of cash payments.
Census	Enumeration of PAPs and their assets.	Forms the basis for eligibility and entitlement determination.
Asset Inventory	Detailed listing of affected assets.	Includes structures, business assets, and access-related losses.
Eligibility Criteria	Conditions determining qualification for compensation or assistance.	Based on census and cut-off date.
Monitoring and Evaluation	Continuous tracking of RAP implementation and outcomes.	Ensures compliance and livelihood restoration

(M&E)		success.
Project Coordination Unit (PCU)	Dedicated unit responsible for RAP implementation oversight.	Coordinates compensation, relocation, GRM, and reporting.
Relocation Assistance	Support provided to move PAPs and assets.	Includes transport, logistics, and setup support.
Livelihood Continuity	Ability of PAPs to maintain income-generating activities post-relocation.	Central objective of RAP and LRP.
Integration into Formal Systems	Inclusion of informal actors into structured systems.	PAPs may be integrated into formal waste management value chains.
Market Linkage Support	Assistance to reconnect PAPs to buyers and suppliers.	Ensures continuity of scrap trading and related activities.
Vulnerable Group	. Vulnerable groups are individuals or populations who may be disproportionately affected by project impacts due to greater exposure to risks, higher sensitivity, or limited capacity to cope with and recover from adverse effects.	Require targeted consultation and tailored support measures for vulnerable groups identified women, youth, very low-income informal workers

COMPENSATION SUMMARY SHEET

#	Variables	Response /Date
	A. General	
1	Region/Province/Department	Greater Region -Ghana
2	Municipality/District	Accra Metropolitan Assembly (AMA)
3	Village/Suburb	Jamestown/ Within the Ashiedu Keteke Sub-Metropolitan Area
4	Activity(ies) that trigger resettlement	The priority is not residential resettlement but business relocation. Thus, activities that triggered economic resettlement are business relocation, which will lead to the following risk: • loss of business operating space; • disruption of scrap dealing and waste-related livelihoods; • removal or relocation of temporary structures; • disruption of access to waste materials; • temporary loss of income during relocation; • disruption of customer and supplier networks.
5	Project overall cost	\$200,000
6	Overall resettlement / relocation cost	\$150,000
7	Applied cut-off date (s)	8 ^m of May 2026
8	Dates of consultation with the	9 ^m April 2026

	people affected by the project (PAP)	7 ^m May 2026
9	Dates of the negotiations of the compensation rates / prices	There was no compensation rate rather AMA agreed to bearing the relocation cost
	B. Specific information	
10	Number of people affected by the project (PAP)	104 PAPs
11	Number of Physically displaced	Non
12	Number of economically displaced	104
13	Number of affected households	NA
14	Number of females affected	7
15	Number of vulnerable affected	7
16	Number of major PAP	97
17	Number of minor PAP	7
18	Number of total right-owners and beneficiaries	104
19	Number of households losing their shelters	NA
20	Total area of lost arable/ productive lands (ha)	NA
21	Number of households losing their crops and/or revenues	NA
22	Total areas of farmlands lost (ha)	NA
23	Estimation of agricultural revenue lost (USD)	NA
24	Number of buildings to demolish totally	No block or structure to be demolished just shelter that will be replaced at the alternative site.
25	Number of buildings to demolish totally at 50%	Non

26	Number of buildings to demolish totally at 25%	No
27	Number of tree-crops lost	No
28	Number of commercial kiosks to demolish	Non
29	Number of ambulant/street sailors affected	Non
30	Number of community-level service infrastructures disrupted or dismantled	Non
31	Number of households whose livelihood restoration is at risk	Non
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EXECUTIVE SUMMARY

This Resettlement Action Plan (RAP) and Livelihood Restoration Plan (LRP) has been prepared for the Construction and Operation of the Source-Separated Organic Waste Composting Plant in Jamestown, Accra, implemented by the Accra Metropolitan Assembly (AMA) with support from the African Development Bank (AfDB). The project is located on approximately 1.77 hectares of public land under AMA jurisdiction in Jamestown, within the Ashiedu Keteke Sub-Metropolitan Area. The project seeks to improve municipal solid waste management, promote source separation, reduce organic waste disposal at landfills, produce compost, reduce methane emissions, and support Accra's circular economy and climate resilience agenda. The Environmental and Social Impact Assessment (ESIA) confirmed that the project will generate significant environmental and public health benefits. However, it will also affect informal economic activities currently taking place within the project footprint. These include scrap dealing, waste picking, informal recycling, dismantling, sorting, and small-scale support services. Although the land is publicly owned by AMA and no compulsory acquisition of privately owned land is required, the project will cause economic displacement through loss of access to business space, waste streams, structures, and income-generating activities. This RAP/LRP has therefore been prepared to ensure that affected persons are identified, consulted, compensated where applicable, relocated to a prepared alternative site, and supported to restore or improve their livelihoods in accordance with AfDB Integrated Safeguards System (ISS, 2023), particularly Operational Safeguard 5 (OS5).

Purpose and Objectives of the RAP/LRP

The main purpose of this RAP/LRP is to provide a practical and implementable framework for managing economic displacement and livelihood restoration associated with the project.

The specific objectives are to:

1. avoid or minimize displacement where feasible;
2. identify and enumerate all Project Affected Persons (PAPs);
3. establish eligibility criteria and entitlement packages;
4. compensate affected structures at full replacement cost, as applicable;
5. relocate PAPs to a prepared alternative site;
6. restore and, where possible, improve livelihoods;
7. establish an accessible Grievance Redress Mechanism (GRM);
8. define institutional, financial, monitoring, and implementation arrangements.

The guiding principle is that no PAP should be made worse off as a result of the project.

Legal and Institutional Framework for Resettlement

The RAP/LRP is guided by Ghanaian legislation and AfDB safeguard requirements. Key national instruments include the 1992 Constitution of Ghana, the Lands Act, 2020 (Act 1036), and the Environmental Protection (Environmental Assessment) Regulations, 2025 (L.I. 2504). The project site is public land under AMA jurisdiction. Therefore, compensation for land acquisition is not applicable in the same way it would be for privately owned land. However, informal users occupying the site have structures, operational assets, business inventory, and livelihoods that will be affected. These impacts require mitigation.

Under Ghana's Land Act, 2020 (Act 1036) and associated Limitation Act (NRCD 54), the right to compensation for squatters depends on whether they have acquired legal title through adverse possession (12+ years of continuous, uninterrupted, hostile occupation) or if they are considered "occupiers in good faith" whose improvements are being acquired.

Key Aspects of Squatter Rights and Compensation:

- **Adverse Possession (12-Year Rule):** If a squatter occupies private land for 12 years or more without interruption, the original owner's right to recover the land is barred. At this point, the squatter may become the legal owner and could be entitled to compensation if the state later acquires that land.
- **Public Land Exception:** The Land Act, 2020 (Act 1036) explicitly removes the ability of a squatter to acquire title to public land by adverse possession, regardless of the duration of their occupation.
- **Compensation for Improvements:** If a squatter is evicted, they generally do not have a right to compensation for the land itself if they have not met the 12-year threshold. However, in cases of compulsory acquisition, they may be compensated for structures, investments, and other assets (improvements) they built on the land, particularly if they can prove they were in "good faith".
- **No Compensation for Short-term Trespassers:** A person who has been on the land for less than 12 years (a mere trespasser) has no legal right to compensation.

However, the AfDB OS5 applies because the project will cause economic displacement. OS5 recognizes that people without formal land title may still be eligible for assistance where they lose access to assets, resources, or livelihoods. Where national law and AfDB requirements differ, the higher standard applies. This means:

- compensation must be at full replacement cost;
- depreciation must not be deducted;

- informal and non-title holders must be assisted;
- livelihood restoration is mandatory;
- monitoring and completion audit are required.

Linkage with the ESIA

The RAP/LRP is directly linked to the ESIA. The ESIA identified the project footprint, existing land use, informal economic activities, potential disruption of waste value chains, and the likelihood of economic displacement. It therefore recommended preparation of a RAP/LRP to address impacts on informal operators and livelihood systems. The RAP/LRP operationalizes the ESIA commitments by providing:

- PAP identification and census;
- asset inventory;
- eligibility and entitlement framework;
- compensation and relocation approach;
- livelihood restoration measures;
- stakeholder engagement;
- grievance redress;
- monitoring and completion audit.

The RAP is therefore the operational bridge between ESIA impact identification and actual implementation of mitigation measures.

Project Description and Resettlement Triggers

The project involves the construction and operation of a composting plant for source-separated organic waste. Key components include:

- waste reception and sorting areas;
- composting and curing zones;
- storage and packaging areas;
- internal access roads;
- drainage and leachate management systems;
- supporting utilities and operational infrastructure.

The key activities triggering resettlement impacts are:

- site clearance;
- removal and relocation of informal operators;
- restriction of access to business space;
- restriction or reorganization of access to waste streams;
- formalization of waste management systems.

The main form of displacement is economic displacement. Physical displacement is limited and relates mainly to temporary business structures, sheds, kiosks, containers, and makeshift operational spaces. No residential displacement is anticipated.

Main Socio-Economic Characteristics of the PAPs Working Areas

The project is located in Jamestown within the Ashiedu Keteke Sub-Metropolitan Area of Accra, one of the oldest and most densely populated urban settlements in Ghana. The area is characterized by high levels of informal economic activity, mixed land use, inadequate infrastructure, limited formal employment opportunities, and strong dependence on daily income-generating activities. The project footprint currently supports an active informal waste economy comprising scrap dealing, dismantling, sorting, recycling, waste picking, loading services, transportation support, and small-scale trading activities. The proposed Source-Separated Organic Waste Composting Plant presents significant opportunities for improved municipal waste management, reduced environmental pollution, greenhouse gas emission reduction, compost production, job creation, and integration of informal actors into a more structured waste management system. However, the project also presents socio-economic risks, primarily associated with the disruption of existing livelihoods that depend on access to the project site and waste streams. Key risks include temporary loss of income, disruption of business operations, interruption of established customer and supplier networks, reduced access to recyclable materials, and potential livelihood decline if relocation and livelihood restoration measures are not effectively implemented. The socio-economic assessment confirmed that the affected population relies heavily on site-based economic activities and daily cash flows, making livelihood restoration and business continuity critical components of the RAP.

Land Status and Tenure Regime

The proposed project site covers approximately 1.77 hectares of land under the ownership and jurisdiction of the Accra Metropolitan Assembly (AMA). The land is public land and is not subject to compulsory acquisition from private landowners.

The current occupants are primarily informal users and operators who have established economic activities on the site but do not possess formal legal title, leasehold rights, or recognized ownership interests in the land. Although the PAPs do not have legal ownership rights over the land, they have established businesses, structures, business inventory, operational assets, and economic dependence on the site. In accordance with AfDB Operational Safeguard 5 (OS5), these PAPs are eligible for assistance, relocation support, livelihood restoration measures, and compensation for eligible structures and improvements, notwithstanding the absence of formal land tenure rights.

Profile of Project Affected Persons (PAPs)

The census and socio-economic survey identified a total of 104 Project Affected Persons (PAPs) who derive their livelihoods directly or indirectly from activities conducted within the project area of influence. The PAPs consist predominantly of scrap dealers who own and operate scrap collection, storage, sorting, dismantling, and trading businesses within the site. Additional PAP categories include waste pickers, informal workers such as loaders and dismantlers, and traders providing food and support services to site users.

The PAP profile is summarized as follows:

PAP Category	Number	Characteristics
Scrap Dealers	90	Primary operators with business inventory, equipment, storage areas and customer networks
Waste Pickers	3	Individuals dependent on access to recyclable materials and waste streams
Informal Workers	4	Loaders, dismantlers, assistants and casual labourers dependent on daily wages
Traders / Support Service Providers	7	Food vendors and ancillary service providers supporting site operations
Total	104	Economically displaced persons requiring relocation and livelihood restoration support

The census also identified formally classified vulnerable groups requiring special assistance at the time of assessment. The RAP includes a vulnerability screening and contingency support mechanism to identify and assist any vulnerable individuals that may emerge during implementation.

Overall, the project's primary social impact is economic displacement rather than physical displacement. Consequently, the RAP focuses on business relocation, protection of productive assets, restoration of income sources, continuity of economic activities, and integration of PAPs into a more organized and sustainable waste management system – all of which associated costs are to be fully borne by the project proponent (Accra Metropolitan Assembly).

Social and Economic Impacts of the Project on Affected Persons

The proposed Source-Separated Organic Waste Composting Plant will be developed on approximately 1.77 hectares of land within the Jamestown/Ashiedu Keteke area of Accra. The land falls under the ownership and management of the Accra Metropolitan Assembly (AMA) and is currently occupied by informal economic operators who utilize the site for scrap trading, recycling, dismantling, waste recovery, storage, and related support services. Although the affected persons do not possess formal ownership rights over the land, they have established economic activities and livelihood systems that are directly dependent on the site.

Jamestown and the wider Ashiedu Keteke area represent one of the oldest and most densely populated urban settlements in Accra. The area is characterized by mixed land use, high levels of informality, inadequate urban infrastructure, limited access to formal employment opportunities, and significant dependence on daily income-generating activities. The local economy is driven largely by small-scale enterprises, informal trading, waste recovery activities, transport services, artisanal work, and other micro-enterprises that provide livelihoods for a large segment of the population.

The project site currently functions as an important economic hub within the informal waste and recycling value chain.

Activities undertaken on the site include:

- Scrap metal collection, aggregation, and trading;
- Vehicle dismantling and recovery of reusable parts;
- Sorting and processing of recyclable materials;
- Waste picking and recovery of valuable materials from waste streams;
- Temporary storage of scrap materials and equipment;
- Informal transportation and loading services;

- Small-scale trading and support services.

The census and socio-economic survey identified a total of 104 Project Affected Persons (PAPs) who derive all or part of their livelihoods from activities undertaken within the project footprint. These PAPs comprise scrap dealers, waste pickers, informal workers, dismantlers, transport operators, and traders who are economically linked through a network of suppliers, buyers, processors, and customers.

The socio-economic assessment revealed varying levels of economic vulnerability among PAPs. Most PAPs operate within the informal sector with limited savings, limited access to formal credit, and a high dependence on daily cash flow for household survival. Consequently, even short-term disruptions to business operations may significantly affect household income, food security, and overall well-being. The RAP therefore adopts a precautionary approach that allows additional support measures to be provided should vulnerable cases emerge during implementation.

The project will not require compulsory acquisition of privately owned land, nor will it result in residential displacement. However, implementation of the composting facility will require the clearance of existing economic activities from the project site, resulting primarily in economic displacement. The principal impacts on PAPs include:

- Loss of access to current business operating space;
- Loss of temporary structures, sheds, kiosks, containers, and workspaces;
- Temporary interruption of business operations during relocation;
- Restricted access to waste streams and recyclable materials during transition;
- Potential disruption of established customer, supplier, and market networks;
- Temporary loss of income during the relocation period;
- Increased transportation costs and operational adjustments during business re-establishment.

In addition to these direct impacts, several indirect impacts may occur if relocation is not effectively managed. These include reduced business productivity during transition, loss of customers due to changes in location, reduced access to suppliers, increased operating costs, temporary unemployment among informal workers, and disruption of economic relationships that have developed over time within the existing scrap and recycling cluster. Such impacts could disproportionately affect PAPs whose livelihoods depend exclusively on activities undertaken at the site.

To address these impacts, the RAP adopts a relocation and livelihood restoration approach consistent with AfDB Operational

Safeguard 5 (OS5). Loss of access to existing business operating spaces will be mitigated through the allocation of serviced plots and designated workspaces at a prepared relocation site prior to displacement. Temporary structures, sheds, kiosks, containers, and other eligible improvements will be replaced through full replacement cost compensation and/or reconstruction by the Accra Metropolitan Assembly (AMA) at the relocation site. Temporary interruption of business activities during relocation will be minimized through phased relocation, logistical assistance, transportation support, and business re-establishment measures. Restricted access to waste streams and recyclable materials will be addressed through the integration of PAPs into the reorganized waste management and recycling system and the maintenance of access to productive resources at the new site. Potential disruption of customer, supplier, and market networks will be mitigated through market linkage support, stakeholder coordination, and assistance in reconnecting PAPs to existing commercial relationships. Temporary income losses during the relocation period will be addressed through livelihood restoration measures and, where relocation delays exceed six months, trigger-based transitional livelihood support. Increased transportation costs and operational adjustments associated with business re-establishment will be mitigated through project-financed relocation assistance, transportation of business assets and inventory, and support for restarting operations at the relocation site. Detailed mitigation, entitlement, relocation, and livelihood restoration measures are presented in Chapters 9 and 10 of this RAP.

The socio-economic assessment further established that scrap materials stored on the site represent business inventory, working capital, and productive assets rather than waste. Consequently, the relocation and preservation of these materials are critical to livelihood continuity. Loss, damage, or restricted access to these assets could result in significant economic hardship for affected operators.

Despite these risks, the project also presents important socio-economic opportunities. The development of a modern composting facility is expected to improve environmental sanitation, enhance waste management efficiency, reduce public health risks associated with unmanaged waste, create new employment opportunities within the formal waste sector, and strengthen circular economy initiatives in the Greater Accra Metropolitan Area. Through the implementation of the RAP and Livelihood Restoration Plan (LRP), the project seeks to ensure that affected persons are able to transition successfully to the new site, restore their livelihoods, and continue participating in the waste and recycling economy without being worse off as a result of the project.

Given the high dependence of PAPs on site-based economic activities, livelihood restoration, relocation support, business continuity measures, and sustained stakeholder engagement constitute critical elements of the RAP. These measures are designed to mitigate both direct and indirect displacement impacts and to ensure compliance with AfDB Operational Safeguard 5 on Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement.

Stakeholder Engagement and Disclosure

Stakeholder engagement was undertaken as part of the ESIA and RAP preparation process. Stakeholders included AMA officials, sub-metropolitan representatives, local leaders, scrap dealers, informal waste operators, community members, service providers, and relevant institutions. Consultations focused on:

- project impacts;
- PAP identification;
- relocation expectations;
- compensation principles;
- livelihood restoration needs;
- grievance procedures;
- disclosure of the cut-off date;
- concerns around loss of income and business continuity.

The RAP provides for ongoing engagement during implementation. PAPs and their associations will be involved in relocation planning, site allocation, validation of PAP records, grievance resolution, and livelihood restoration monitoring.

Grievance Redress Mechanism

A dedicated GRM has been established to ensure that complaints are received, registered, assessed, resolved, and monitored in a transparent and timely manner.

The GRM will operate at multiple levels:

- community level;
- AMA/sub-metro level;
- regional escalation through GARCC where required;

- judicial or arbitration recourse as a final option.

The GRM will address complaints relating to:

- PAP eligibility;
- cut-off date disputes;
- compensation valuation;
- site allocation;
- relocation logistics;
- damage to assets during movement;
- livelihood restoration support;
- implementation delays.

The GRM includes procedures for confidential handling of GBV/SEA/SH-related complaints. A lean GRM budget of **USD 25,000** is proposed, based on use of existing AMA structures, community focal persons, simple digital tools, and targeted capacity support.

Impact Assessment and Resettlement Needs

The impact assessment confirms that the project will mainly result in economic displacement. Key impacts include:

- loss of business operating space;
- disruption of scrap dealing and waste-related livelihoods;
- removal or relocation of temporary structures;
- disruption of access to waste materials;
- temporary loss of income during relocation;
- disruption of customer and supplier networks;
- risk of livelihood decline if relocation is not properly managed.

The RAP response is therefore livelihood-centered. The focus is not residential resettlement (as this does not apply) but business relocation, preservation of productive assets, restoration of income, and reintegration into a functional economic system.

Census, Asset Inventory and PAP Profile

The census and asset inventory identified **104 Project Affected Persons (PAPs)**.

PAP Category	Estimated Number	Description
Scrap Dealers	90	Main operators owning scrap stock, business space, and equipment
Waste Pickers	3	Collectors dependent on waste streams
Informal Workers	4	Assistants, loaders, dismantlers, and support labour
Traders -Food venders/ Support Services	7	Food vendors and small support-service providers
Total	104	

The census confirms that the dominant affected group is scrap dealers. This means the RAP must prioritize business continuity, relocation of stock, site allocation, and livelihood restoration. No vulnerable PAPs were formally identified during the census. However, the RAP includes a contingency mechanism to identify and assist any vulnerability that may emerge during implementation.

Eligibility, Entitlements, Compensation and Relocation Framework

A census and asset inventory undertaken within the project footprint identified a total of 104 Project Affected Persons (PAPs), comprising scrap dealers, waste pickers, informal workers, and support-service providers whose livelihoods depend on activities conducted on the site. A cut-off date was established and publicly disclosed to prevent speculative occupation and ensure that only eligible PAPs identified during the census benefit from compensation and assistance measures.

As the project site is located on land owned and managed by the Accra Metropolitan Assembly (AMA), PAPs are not eligible for compensation for land. However, in accordance with AfDB Operational Safeguard 5 (OS5), PAPs are eligible for compensation and assistance related to economic displacement, including compensation for affected structures at full replacement cost, relocation support, site allocation at the designated relocation area, livelihood restoration assistance, and transitional support where applicable.

The census and asset inventory confirmed that the principal losses relate to business operating spaces, temporary structures, containers, kiosks, access to waste streams, and temporary disruption of livelihoods. Scrap materials stored on-

site were recognized as business inventory and productive assets. Consequently, the RAP adopts a relocation-based approach whereby scrap materials, equipment, and business assets will be transferred to the new site with logistical support rather than compensated in cash.

Extensive consultations were undertaken with PAPs, scrap dealer associations, AMA officials, community representatives, and other stakeholders during RAP preparation. Key concerns raised included continuity of business operations, accessibility of the relocation site, preservation of customer networks, and livelihood restoration. These consultations informed the design of the entitlement framework, relocation strategy, and livelihood restoration measures.

The project's primary mitigation measure is the relocation of PAPs to a designated alternative site to be prepared by AMA prior to displacement. The relocation site will provide designated operating spaces and basic infrastructure to support continuity of economic activities. PAPs will receive assistance for transportation of scrap materials, equipment, containers, and other business assets, as well as support for re-establishing operations at the new location.

The total RAP budget covers replacement of affected structures, relocation logistics, site preparation and installation of affected structures, livelihood restoration support, grievance management, implementation, monitoring, and contingency provisions. Compensation payments as applicable, relocation assistance, and site preparation activities will be completed prior to displacement. Livelihood restoration measures will continue after relocation to ensure that affected persons restore or improve their income levels and living standards. Implementation will be undertaken according to a phased schedule covering RAP disclosure, PAP verification, compensation, site preparation, relocation, livelihood restoration, and post-relocation monitoring.

The entitlement framework includes:

Type of Loss	PAP Category	Entitlement
Loss of business space	Scrap dealers	Alternative serviced site and relocation support
Loss of structures	Scrap dealers and	AMA-built replacement structure at the

	traders	relocation site.
Temporary income loss	Eligible PAPs	Trigger-based transitional support if relocation is delayed beyond three (3) months
Loss of access to waste streams	Scrap dealers and waste pickers	Integration into new waste/recycling system
Loss of employment	Informal workers	Skills training, job linkage, and employment support

Scrap materials are treated as business inventory and working capital. They will not be compensated in cash except where verified damage occurs during relocation. The preferred approach is supported relocation to preserve productive assets and avoid inflated claims.

Relocation Strategy

Relocation to a new site is the central mitigation measure under this RAP. The relocation strategy is based on the following principles:

- the new site must be prepared before displacement;
- PAPs must participate in site planning and allocation;
- the site must support continuation of economic activities;
- access to markets, buyers, suppliers, and waste streams must be maintained;
- relocation must be sequenced to reduce disruption.

Relocation support will include:

- transport assistance;
- loading and offloading support;
- movement of scrap materials, tools, containers, and equipment;
- allocation of designated plots or workspaces;
- basic infrastructure such as access, drainage, demarcation, and security;
- setup support at the new site.

NB: Accra Metropolitan Assembly shall bear the total costs of the complete relocation of all assets to the new site.

Livelihood Restoration Plan

The LRP is designed to ensure that PAPs can restart and sustain their income-generating activities after relocation.

Livelihood restoration measures include:

- allocation of serviced space at the relocation site;
- relocation of scrap stock and equipment;
- business re-establishment support;
- market linkage support;
- reconnection to buyers and suppliers;
- integration into formal waste and recycling systems;
- skills training and employment support for informal workers.

Transitional livelihood support will only be triggered if relocation is not completed within **three months** from the officially communicated relocation start date. If triggered, support may include temporary income support, business restart assistance, and market linkage support.

Implementation Arrangements

Implementation will be led by AMA through a Project Coordination Unit (PCU). The PCU will coordinate all RAP and LRP activities, including compensation, relocation, livelihood restoration, GRM operation, monitoring, reporting, and completion audit.

Key institutions and roles include:

Institution / Actor	Role
AMA	Lead implementation agency
PCU	Day-to-day coordination and reporting
RAP Implementation Team	Field-level execution
Lands Commission / valuation	Technical valuation guidance

support	
EPA	Environmental and social regulatory oversight
Social Welfare Department	Contingency support if vulnerability emerges
Contractors / Service Providers	Site preparation and relocation logistics
PAP Representatives	Communication, validation, and mobilization
GRM Committees	Complaint handling and dispute resolution
AfDB / Development Partners	Safeguard compliance oversight

NB: No displacement shall occur until compensation, relocation-site preparation, and relocation is fully implemented.

Implementation Schedule

The RAP will be implemented in phases.

Activity	Indicative Timeline/Dates
RAP disclosure and approval	Month 1/ June 2026
PAP verification and agreement	Month 1-2 / June 2026
Relocation site preparation	Month 4-7- /Sept-Dec 2026
Relocation of PAPs	Month 8 January 2027
Monitoring and evaluation	Continuous

NB: The sequencing is critical. Compensation (as applicable) and relocation-site readiness must occur before displacement.

Monitoring and Evaluation of the RAP Execution

Monitoring will be conducted internally by the PCU and RAP Implementation Team. External monitoring may be undertaken where required by AfDB or other financing partners.

Monitoring will track:

- relocation progress;
- livelihood restoration;
- GRM performance;
- stakeholder engagement;
- documentation completeness;
- income recovery.

Monitoring of RAP implementation will be undertaken through a combination of internal, institutional, and external monitoring mechanisms to ensure compliance with AfDB Operational Safeguard 5 (OS5), national requirements, and RAP commitments. Internal monitoring will be conducted by the Project Coordination Unit (PCU) and RAP Implementation Team on a continuous basis. This will focus on compensation delivery, relocation progress, livelihood restoration, stakeholder engagement, grievance management, and implementation of corrective actions. In addition, relevant government institutions will participate in monitoring and oversight as follows:

- **Accra Metropolitan Assembly (AMA):** Overall supervision of RAP implementation, relocation site preparation, compensation administration, and stakeholder engagement.
- **Environmental Protection Authority (EPA):** Oversight of compliance with environmental and social commitments contained in the ESIA, RAP, and environmental permitting requirements.
- **Greater Accra Regional Coordinating Council (GARCC):** Coordination and oversight of implementation progress, including escalation of grievances that cannot be resolved at the local level.
- **Department of Social Welfare:** Monitoring of social impacts, livelihood restoration outcomes, and provision of support where vulnerable cases emerge during implementation.
- **Lands Commission (where required):** Technical guidance on asset valuation principles, compensation verification, and land-related matters associated with relocation.
- **National Development Planning Commission (NDPC) and/or relevant waste management authorities (where applicable):** Monitoring alignment of project implementation with local development and waste management objectives.

External monitoring may be undertaken by the African Development Bank (AfDB), independent consultants, or other financing partners to verify compliance with safeguard requirements and assess the effectiveness of compensation,

relocation, and livelihood restoration measures.

A RAP Completion Audit will be conducted upon completion of implementation to verify that all eligible PAPs have received their entitlements, relocation has been completed, livelihoods have been restored or improved, and RAP objectives have been achieved. The audit findings will inform any corrective actions required before formal closure of the RAP.

Key targets include:

- 100% of eligible PAPs relocated;
- at least 90% of PAPs able to resume economic activities;
- income restored or improved compared to baseline;
- at least 90% of grievances resolved;
- 100% completeness of RAP records.

Periodic reports will be prepared and disseminated and a Completion Audit will be conducted at the end of implementation to confirm whether all RAP commitments have been fulfilled and whether livelihood restoration objectives have been achieved.

Budget and Financing Arrangements

The estimated RAP budget is **USD 200,000**, including contingency.

Cost Category	Estimated Cost (USD)
Relocation logistics	25,000
Relocation site preparation	30,000
Livelihood restoration support	25,000
Transitional support contingency	25,000
GRM implementation	25,000
RAP implementation / PCU support	20,000
Monitoring and evaluation	20,000
Subtotal	150,000
Contingency	50,000

Total Estimated Budget	200,000
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NB: The budget will be financed by the project proponent and/or project financing arrangements. Funds must be secured and available before implementation begins.

Key Risks and Mitigation

Key RAP implementation risks include:

- delay in relocation-site preparation;
- disputes over compensation or eligibility;
- conflict over allocation of space at the new site;
- damage to assets during movement;
- livelihood disruption during transition;
- exclusion from formalized waste systems.

Mitigation measures include:

- transparent verification and valuation;
- early site preparation;
- participatory site allocation;
- supervised relocation logistics;
- functional GRM;
- trigger-based transitional support;
- continuous livelihood monitoring.

Conclusion

This RAP/LRP provides a comprehensive and practical framework for managing the economic displacement impacts of the Source-Separated Organic Waste Composting Plant in Jamestown. It recognizes that although PAPs do not hold formal land title, they have established economic dependence on the site and must therefore be supported in line with AfDB OS5. The RAP focuses on relocation, livelihood restoration, and structured implementation. With effective execution, the project can deliver its environmental, climate, and waste management benefits while ensuring that affected persons are treated fairly, relocated timely and safely, and supported to restore or improve their livelihoods. This will be the full responsibility of the Accra Metropolitan Assembly, who will bear the full cost of relocation of PAPs economic assets to the new site, preparation

of the site, installation of the existing structures e.g. prayer/resting shed and related structures.

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1. INTRODUCTION

This Resettlement Action Plan (RAP) and Livelihood Restoration Plan (LRP) has been prepared for the Construction and Operation of the Source-Separated Organic Waste Composting Plant in Jamestown, Accra, implemented by the Accra Metropolitan Assembly (AMA) with financing support from the African Development Bank (AfDB). The RAP responds directly to the findings of the Environmental and Social Impact Assessment (ESIA), which confirmed that while the project delivers significant environmental and climate benefits, it will also result in economic displacement of informal waste sector

actors, including scrap dealers, waste pickers, and associated service providers operating within the project footprint and its area of influence.

Project Context and Resettlement Trigger

The project is situated on approximately 1.77 hectares of publicly owned land under AMA, currently occupied by informal users without formal land rights but with established economic dependence on the site. As a result:

- No compulsory acquisition of privately owned land is required;
- However, loss of access to business space, waste streams, and income-generating activities will occur;
- This constitutes economic displacement under AfDB safeguards, triggering the requirement for a RAP/LRP.

Accordingly, this RAP is not driven by land ownership transfer, but by the need to manage livelihood disruption and ensure equitable economic transition.

Policy and Legal Framework Alignment

This RAP is developed in full compliance with:

- Applicable national legislation, including the Constitution of Ghana, the Lands Act, 2020 (Act 1036), and the Environmental Assessment Regulations, 2025 (L.I. 2504).
- The AfDB Integrated Safeguards System (ISS, 2023), particularly Operational Safeguards 5 (OS5) and 10 (OS10);

While national law primarily addresses compensation linked to legal land interests, this RAP adopts the higher AfDB OS5 standard, which requires:

- Compensation at full replacement cost (without depreciation);
- Inclusion of informal and non-title holders;
- Mandatory livelihood restoration and improvement;
- Structured implementation, monitoring, and completion audit.

Strategic Approach of the RAP

This RAP adopts a relocation-centered and livelihood-focused approach, reflecting the nature of impacts and the structure of the informal waste economy. The core strategy is built on the following pillars:

- **Relocation, not displacement without support**
 - o PAPs will be moved to a prepared alternative site that supports continued economic activity

- **Asset protection over cash substitution**
 - Scrap materials are treated as productive business assets, to be relocated rather than compensated in cash
- **Livelihood continuity and restoration**
 - The LRP ensures PAPs can resume, restore, and where possible improve income levels
- **System integration**
 - Informal actors are supported to integrate into the formalized waste management system
- **Risk-managed transition**
 - Transitional support mechanisms are triggered if relocation delays occur. Transitional support will be provided as necessary to all economically displaced persons, based on a reasonable estimate of the time required to restore their income-earning capacity, production levels, and standards of living.

Purpose of the RAP

The purpose of this RAP/LRP is to provide a comprehensive, implementable framework to:

- Identify all Project Affected Persons (PAPs) through a verified census;
- Define eligibility and entitlement in a transparent manner;
- Provide compensation for affected assets at full replacement cost;
- Facilitate relocation to a functional and serviced site;
- Restore and enhance livelihoods through structured interventions;
- Establish a functional Grievance Redress Mechanism (GRM);
- Ensure effective implementation through clear institutional arrangements, budget, and schedule;
- Monitor outcomes and verify compliance through a completion audit.

Overarching Principle

The guiding principle of this RAP is clear:

Project Affected Persons (PAPs) will not be made worse off as a result of the project, and will be supported to restore or improve their livelihoods in a structured, fair, and sustainable manner.

Role of the RAP within the Project

This RAP is not a standalone document, it is the operational bridge between ESIA findings and on-the-ground

implementation. It translates identified risks into:

- Concrete compensation measures
- Relocation logistics and sequencing
- Livelihood restoration interventions
- Institutional responsibilities and timelines
- Monitoring and accountability mechanisms

Structure of the Document

The RAP is structured to reflect the full lifecycle of resettlement planning and implementation, including:

- Impact assessment and resettlement needs
- Census and asset inventory
- Eligibility and entitlement framework
- Compensation and relocation strategy
- Livelihood Restoration Plan (LRP)
- Grievance Redress Mechanism (GRM)
- Implementation arrangements
- Monitoring, evaluation, and completion audit
- Budget and financing

1.1 Background and Project Context

The Accra Metropolitan Assembly (AMA), with financial support from the African Development Bank (AfDB), is implementing a Source-Separated Organic Waste Composting Plant in Jamestown, within the Ashiedu Keteke Sub-Metropolitan Area of Accra. The project forms part of Accra's broader municipal solid waste (MSW) reform agenda, circular economy transition strategy, and climate resilience framework aimed at improving environmental sustainability and public health outcomes in the Greater Accra Metropolitan Area. Accra generates substantial volumes of municipal solid waste annually, with organic waste constituting more than 50 percent of the total waste stream. At present, the majority of this organic waste is transported to landfill sites where it decomposes anaerobically, producing methane, a greenhouse gas with significantly higher global warming potential than carbon dioxide. In addition to contributing to climate change, the current waste management system exerts pressure on landfill capacity, accelerates landfill saturation, generates leachate that threatens

groundwater quality, and contributes to odour and vector-related public health concerns.

The proposed composting facility seeks to transform this waste management challenge into an environmental and economic opportunity by diverting source-separated organic waste from landfills and converting it into nutrient-rich compost. The compost product is expected to support urban and peri-urban agriculture, improve soil fertility, reduce reliance on chemical fertilizers, and contribute to food security objectives. The project therefore aligns with Ghana's climate mitigation commitments, sustainable urban development goals, and green job creation agenda.

To assess the environmental and social implications of the project, an Environmental and Social Impact Assessment (ESIA) was undertaken in accordance with Ghana's Environmental Assessment Regulations, 1999 (LI 1652), and applicable international standards. The ESIA concluded that the project will generate significant positive environmental and socio-economic benefits, including reduced greenhouse gas emissions, improved sanitation conditions, job creation within the formal waste sector, and strengthened institutional waste management systems. However, the ESIA also identified that implementation of the project will result in economic displacement impacts within the project footprint. Specifically, the site earmarked for development is currently occupied and utilized by informal economic actors, including:

- Scrap dealers and recyclers operating within the proposed project site;
- Informal waste pickers and small-scale recyclers whose access to recyclable and organic waste streams may be altered by the formalization of waste segregation;
- Other informal users dependent on the site and surrounding waste value chain activities for livelihood generation.

Although large-scale physical relocation of residential households is not anticipated, the ESIA confirmed that economic displacement and potential loss of income sources will occur. These impacts arise primarily from the clearance of the project footprint and the restructuring of access to waste materials that currently support informal livelihoods. In accordance with the AfDB Integrated Safeguards System (ISS, 2023), particularly Operational Safeguard 5 (OS5) on Land Acquisition, Restrictions on Land Use and Involuntary Resettlement, economic displacement resulting from project activities triggers the mandatory preparation of a Resettlement Action Plan (RAP). OS5 applies not only to physical relocation but also to situations where individuals lose access to land, assets, or income-generating opportunities as a result of project implementation.

This RAP has therefore been prepared to establish a comprehensive framework for managing resettlement-related impacts. It sets out the principles, eligibility criteria, entitlements, compensation mechanisms, livelihood restoration measures,

grievance redress arrangements, and institutional responsibilities necessary to ensure compliance with AfDB OS5 and applicable national legislation.

The fundamental objective of this RAP is to ensure that all Project Affected Persons (PAPs):

- Are identified through a transparent and verifiable census process;
- Are meaningfully consulted and participate in decision-making processes affecting them;
- Receive compensation at full replacement cost without depreciation;
- Are provided with adequate assistance to restore or improve their livelihoods to pre-project levels;
- Receive additional targeted support where identified as vulnerable.

Through the implementation of this RAP, AMA and the AfDB seek to ensure that the environmental and climate benefits of the composting project are not achieved at the expense of vulnerable informal workers but rather contribute to a more inclusive and socially responsible transition toward sustainable waste management in Accra.

1.2 Purpose and Objectives of the RAP

Purpose

The primary purpose of this Resettlement Action Plan (RAP) and Livelihood Restoration Plan (LRP) is to establish a comprehensive framework of principles, procedures, entitlements, and implementation arrangements to effectively mitigate adverse social impacts arising from land acquisition, restrictions on land use, and economic displacement associated with the project. In line with the African Development Bank's Integrated Safeguards System (ISS, 2023), particularly Operational Safeguard 5 (OS5), the RAP/LRP ensures that all Project Affected Persons (PAPs) are compensated at full replacement cost and are supported to restore, and where possible improve, their livelihoods and living standards.

Objectives

Specifically, the RAP/LRP seeks to:

1. Avoid and Minimize Resettlement

Ensure that involuntary resettlement and economic displacement are avoided where feasible, and minimized through appropriate project design, siting, and implementation measures.

2. **Identify and Enumerate Project Affected Persons (PAPs)**

Undertake a comprehensive census and asset inventory to identify all affected individuals, households, and economic actors, including informal and vulnerable groups.

3. **Establish Eligibility and Entitlement Framework**

Define clear eligibility criteria and entitlements for compensation and assistance in accordance with AfDB OS5 and applicable national legislation.

4. **Provide Compensation at Full Replacement Cost**

Ensure that all affected assets and losses are compensated at full replacement cost, without depreciation, and inclusive of transaction and restoration costs.

5. **Restore and Improve Livelihoods (Core LRP Objective)**

Design and implement targeted livelihood restoration measures to enable PAPs, particularly economically displaced persons, to restore, and preferably improve, their pre-project income levels and economic resilience.

6. **Provide Targeted Support to Vulnerable Groups**

Identify and provide additional assistance to vulnerable PAPs, including women, youth, persons with disabilities, and other at-risk groups, to ensure equitable outcomes.

7. **Establish an Effective Grievance Redress Mechanism (GRM)**

Develop and operationalize an accessible, transparent, and culturally appropriate grievance mechanism to address complaints in a timely and fair manner.

8. **Define Institutional, Financial, and Implementation Arrangements**

Establish clear institutional responsibilities, implementation procedures, timelines, and budgetary provisions to ensure effective, transparent, and accountable RAP/LRP implementation, including monitoring and completion audit.

1.3 Linkages with the ESIA and AfDB ISS (OS5)

This Resettlement Action Plan (RAP) and Livelihood Restoration Plan (LRP) is anchored in a coherent framework that integrates: (i) the findings of the Environmental and Social Impact Assessment (ESIA), (ii) the requirements of the project's Terms of Reference under the Expression of Interest (EOI), and (iii) the safeguard standards of the African Development Bank's Integrated Safeguards System (ISS, 2023), particularly Operational Safeguard 5 (OS5). The ESIA provides the analytical basis for identifying resettlement impacts, specifically economic displacement, while the EOI defines the scope and deliverables required for managing these impacts. The RAP/LRP translates these requirements into a structured and

implementable framework comprising compensation measures, livelihood restoration interventions, institutional arrangements, and monitoring mechanisms. Accordingly, this RAP/LRP serves as the operational bridge between impact identification and mitigation implementation, ensuring that all resettlement-related risks identified in the ESIA are addressed in full compliance with AfDB safeguard requirements and aligned with national legal provisions. The following sections elaborate on: (i) the linkage between the RAP/LRP and ESIA findings; and (ii) the alignment of the RAP/LRP with AfDB ISS (OS5) principles.

1.3.1 Linkage with the ESIA

This Resettlement Action Plan (RAP) and Livelihood Restoration Plan (LRP) is directly informed by, and derived from, the findings of the Environmental and Social Impact Assessment (ESIA) prepared for the Construction and Operation of the Source-Separated Organic Waste Composting Plant in Jamestown, Accra. The ESIA serves as the primary analytical foundation for identifying and assessing the project's environmental and social risks, including those related to land acquisition and economic displacement. It provides the evidence base upon which this RAP/LRP is developed, ensuring that all resettlement-related impacts are systematically addressed in accordance with international safeguard requirements.

Key Findings Relevant to Resettlement

The following key conditions and impact pathways necessitating resettlement planning were identified:

- Land acquisition within Jamestown covering approximately 1.77 hectares;
- The presence of informal economic activities within the project footprint;
- Potential disruption of existing waste value chains;
- Risks of economic displacement affecting informal scrap dealers, waste pickers, and related actors;
- The need for structured livelihood restoration measures to mitigate income loss and vulnerability.

The ESIA further confirmed that there are no residential displacement. While physical displacement of residential households is not anticipated, the project will result in economic displacement arising from loss of access to income-generating opportunities and productive resources. This includes impacts on informal operators whose livelihoods are dependent on the current use of the project site and associated waste streams.

ESIA Recommendation and RAP/LRP Trigger

Based on these findings, the ESIA recommended the preparation of a Resettlement Action Plan (RAP), including a Livelihood Restoration Plan (LRP) to address identified impacts in line with international financing requirements. This requirement is

consistent with the project's Terms of Reference under the Expression of Interest (EOI), which mandates the preparation of a RAP to:

- Identify and enumerate all Project Affected Persons (PAPs), including informal actors;
- Assess the nature and extent of displacement;
- Develop compensation and livelihood restoration measures;
- Establish a grievance redress mechanism; and
- Define implementation arrangements, timelines, and budget provisions.

RAP/LRP as an Operational Instrument of the ESIA

This RAP/LRP therefore functions as the operational instrument for implementing ESIA mitigation commitments, translating identified risks into specific, actionable, time-bound, and budgeted interventions. In particular, the RAP/LRP operationalizes ESIA commitments relating to:

- Compensation for loss of assets and income at full replacement cost;
- Livelihood restoration, including support for economic reintegration and income recovery;
- Stakeholder consultation and participation, ensuring continued engagement of affected persons;
- Grievance redress, through establishment of accessible and transparent mechanisms;
- Monitoring and reporting, to track implementation performance and outcomes.

Through this approach, the RAP/LRP ensures that ESIA-identified risks are not only acknowledged but are effectively managed through enforceable implementation measures, thereby safeguarding affected persons and promoting inclusive and sustainable project outcomes.

1.3.2 Compliance with AfDB ISS (2023) - OS5

This Resettlement Action Plan (RAP) and Livelihood Restoration Plan (LRP) has been prepared in full alignment with the African Development Bank's Integrated Safeguards System (ISS, 2023), specifically Operational Safeguard 5 (OS5): Land Acquisition, Restrictions on Land Use and Involuntary Resettlement. OS5 establishes the policy and procedural framework for managing both physical and economic displacement, including situations where project activities result in loss of access to land, assets, or income-generating opportunities. In the context of this project, the RAP is triggered primarily by economic displacement of informal waste sector actors, as identified in the ESIA.

Application of OS5 to the Project Context

In accordance with OS5, economic displacement, such as loss of access to waste streams and livelihood resources, requires the preparation and implementation of a RAP/LRP to ensure that affected persons are adequately compensated and supported. This RAP/LRP therefore ensures that all affected persons, including informal and non-title holders, are recognized and assisted in restoring their livelihoods, consistent with AfDB safeguard requirements.

Core OS5 Principles Reflected in this RAP/LRP

The design and implementation of this RAP/LRP are guided by the following key OS5 principles:

- **Avoidance and Minimization of Displacement**
Resettlement impacts have been minimized through project design and site selection, with displacement considered only where unavoidable.
- **Compensation at Full Replacement Cost**
All affected assets and losses are compensated at full replacement cost, without depreciation, and inclusive of transaction costs.
- **Livelihood Restoration and Improvement**
Priority is given to restoring, and where feasible improving, the livelihoods of economically displaced persons through targeted livelihood restoration programs.
- **Meaningful Consultation and Participation**
PAPs are engaged through inclusive and culturally appropriate consultation processes, ensuring their participation in planning and implementation.
- **Protection of Vulnerable Groups**
Additional assistance is provided to vulnerable PAPs, including women, youth, and persons with disabilities, to ensure equitable outcomes.
- **Grievance Redress Mechanism (GRM)**
A functional, accessible, and transparent GRM is established to address grievances in a timely and fair manner.
- **Monitoring, Evaluation, and Completion Audit**
Robust monitoring systems are established, including internal and external oversight, culminating in a Completion Audit to verify that RAP objectives have been achieved.

Application of the Higher Standard Principle

While this RAP/LRP complies with applicable national legislation governing land acquisition and compensation, it adopts the higher standard of the AfDB ISS (OS5) in areas where gaps exist.

In particular:

- Compensation is based on full replacement cost, rather than depreciated or market value;
- Livelihood restoration is mandatory, not discretionary;
- Informal and non-title holders are eligible for assistance;
- Implementation includes monitoring and completion audit requirements.

Accordingly, where differences arise between national legal provisions and AfDB safeguard requirements, the AfDB OS5 standard prevails, ensuring full compliance with international best practice.

1.4 Scope of the RAP

This RAP and Livelihood Restoration Plan (LRP) defines the full extent of resettlement-related impacts associated with the project, in terms of where impacts occur (geographic scope), who is affected (social scope), and when impacts arise and are addressed (temporal scope). The scope is informed by the ESIA findings and aligns with the requirements of the project's Terms of Reference and the African Development Bank's Integrated Safeguards System (ISS, 2023), ensuring that all affected persons and impact pathways are comprehensively captured and addressed.

1.4.1 Geographic Scope

The geographic scope of the RAP/LRP encompasses all areas directly and indirectly affected by project activities, including:

- The 1.77-hectare project footprint in Jamestown, identified for the construction and operation of the composting facility;
- Adjacent areas where economic activities linked to the project site currently occur, including scrap dealing, waste picking, and informal trading;
- Any additional zones affected by temporary or permanent access restrictions during construction and operation phases.

Accordingly, the geographic scope includes not only the immediate project site but also associated areas within the waste value chain where project activities may alter access to resources, markets, or income-generating opportunities.

1.4.2 Social Scope

The social scope of the RAP/LRP covers all categories of Project Affected Persons (PAPs) identified through the census and socio-economic survey, including both direct and indirect impacts.

These include:

- Economically displaced persons, such as scrap dealers, informal recyclers, and waste pickers whose livelihoods depend on access to the project site and associated waste streams;
- Individuals and groups experiencing temporary income disruption during construction or transition phases;
- Vulnerable groups, including women-led enterprises, youth, elderly persons, and persons with disabilities (PWDs), who may face disproportionate impacts or reduced capacity to restore livelihoods;
- Any physically displaced persons, if identified during the detailed census and asset inventory.

In line with AfDB OS5, the RAP/LRP applies to all affected persons regardless of legal tenure status, including informal and non-title holders.

1.4.3 Temporal Scope

The temporal scope of the RAP/LRP covers all phases of the project lifecycle during which resettlement-related impacts may occur, including:

- **Pre-construction phase:** Land acquisition, site clearance, and initial displacement of economic activities;
- **Construction phase:** Temporary access restrictions, disruption of livelihoods, and transitional impacts;
- **Operational phase:** Long-term changes to waste value chains, access to materials, and livelihood systems.

The obligations of this RAP/LRP remain in effect until all resettlement commitments have been fully implemented and verified. Specifically, implementation is considered complete only when:

- An appropriate site has been identified and allocated to all PAPs to continue their scrap-dealing business activities
- Compensation has been fully paid at replacement cost;
- Livelihood restoration measures have been successfully implemented, with PAPs able to restore or improve their pre-project income levels;
- A Completion Audit confirms that the objectives of the RAP/LRP have been achieved in accordance with AfDB OS5.

1.5 Methodology for RAP Preparation

The preparation of this Resettlement Action Plan (RAP) and Livelihood Restoration Plan (LRP) followed a structured, participatory, and evidence-based methodology, consistent with the requirements of the African Development Bank's

Integrated Safeguards System (ISS, 2023), particularly Operational Safeguard 5 (OS5), as well as good international practice. The methodology builds upon the analytical framework established in the Environmental and Social Impact Assessment (ESIA), including baseline socio-economic analysis, stakeholder engagement processes, and impact identification. It also reflects the requirements of the project's Terms of Reference, which mandate the identification of Project Affected Persons (PAPs), assessment of displacement impacts, and development of compensation and livelihood restoration measures. The RAP/LRP preparation process combined desk-based analysis, field data collection, participatory consultations, and valuation assessments to ensure that all affected persons are accurately identified and that mitigation measures are appropriate, equitable, and implementable.

1.5.1 Desk Review

A comprehensive desk review was undertaken to establish the legal, institutional, and technical foundation for the RAP/LRP. This included:

- Review of ESIA findings, including baseline conditions, stakeholder consultations, and identified social impacts such as disruption of informal waste value chains and economic displacement ;
- Review of applicable national legal and regulatory frameworks governing land acquisition, compensation, and environmental assessment;
- Review of the AfDB ISS (2023), particularly OS5, to ensure alignment with international safeguard requirements;
- Review of project documentation, including site maps, land ownership status, and area of influence, as defined in the ESIA (including the 1.77-hectare project footprint and surrounding impact zones).

This review provided the basis for defining the scope of impacts, identifying regulatory requirements, and designing appropriate resettlement and livelihood restoration measures.

1.5.2 Stakeholder Consultations

Consistent with both ESIA processes and AfDB OS5 requirements, meaningful and inclusive stakeholder consultations were conducted throughout the RAP preparation process.

Consultations were held with:

- Scrap dealers and informal operators located within the project site;
- Informal waste pickers and actors within the waste value chain;

- Local leaders and representatives of the Accra Metropolitan Assembly (AMA);
- Relevant government agencies and community stakeholders;
- Affected community members within the project area of influence.

These consultations built on earlier ESIA engagement processes, which emphasized transparency, inclusiveness, and stakeholder participation in project planning.

Key consultation themes included:

- Nature and extent of anticipated project impacts;
- Preferences regarding compensation and transitional support;
- Potential relocation or alternative business arrangements;
- Livelihood restoration needs and opportunities;
- Grievance redress expectations.

The consultation process ensured that PAPs' views were incorporated into the design of compensation measures and livelihood restoration programs, thereby enhancing ownership and sustainability of outcomes.

1.5.3 Census and Asset Inventory

A detailed census and asset inventory was undertaken to identify and document all Project Affected Persons (PAPs) and their associated assets and livelihood activities.

The census aimed to:

- Identify all individuals, households, and economic actors affected by the project;
- Document existing business activities, including informal waste-related livelihoods;
- Record physical structures, movable assets, and productive assets within the project footprint;
- Identify vulnerable individuals and households requiring additional assistance.

In accordance with international best practice, a cut-off date was established and publicly disclosed to prevent opportunistic settlement or claims after the census period.

This process ensures that all eligible PAPs are captured in a transparent and verifiable manner, forming the basis for compensation and livelihood restoration planning.

1.5.4 Socio-Economic Survey

A detailed socio-economic survey was conducted to establish baseline conditions and assess the potential impacts of displacement on affected persons.

The survey included structured interviews and data collection on:

- Household and individual income levels and sources of livelihood;
- Business operations, turnover, and dependency on site-based activities;
- Tenure arrangements, including formal and informal occupation;
- Household composition and dependency ratios;
- Gender dimensions of impact, including participation of women in waste-related livelihoods;
- Vulnerability factors affecting resilience and recovery capacity.

These findings are consistent with ESIA baseline observations, which highlight the predominance of informal livelihoods, low levels of formal education, and high dependency on waste value chain activities within the project area. The socio-economic data provides the analytical basis for designing targeted livelihood restoration measures and identifying vulnerable groups requiring additional support.

1.5.5 Valuation Approach

Valuation of affected assets and livelihoods was conducted in accordance with AfDB OS5 requirements and internationally accepted valuation principles.

The valuation approach was guided by:

- Replacement cost methodology, ensuring that compensation reflects the full cost of replacing lost assets without depreciation;
- Market-based assessment of structures and physical assets, reflecting prevailing local prices;
- Income-based analysis to inform livelihood restoration measures and transitional support;
- Consultation-based negotiation, ensuring that PAPs are engaged in determining fair and acceptable compensation outcomes.

This approach ensures that compensation and assistance measures are equitable, transparent, and aligned with both national legislation and AfDB safeguard standards.

1.6 Structure of the RAP Report

This RAP is structured in accordance with AfDB requirements and international best practice as follows:

CHAPTER 1: INTRODUCTION

- Background and Project Context
- Purpose of the RAP
- Objectives of the RAP
- Linkages with ESIA and AfDB ISS
- Scope (Geographic, Social, Temporal)
- Methodology
- Structure of the RAP Report

CHAPTER 2: PROJECT DESCRIPTION AND RESETTLEMENT TRIGGERS

- Project Overview
- Project Location and Area of Influence
- Project Components
- Land Requirements
- Activities Triggering Resettlement
- Nature of Displacement
- Avoidance and Minimization Measures

CHAPTER 3: LEGAL AND INSTITUTIONAL FRAMEWORK

- National Legal Framework
- AfDB ISS (OS5)
- Gap Analysis
- Institutional Framework
- Project Coordination Unit (PCU)

CHAPTER 4: SOCIO-ECONOMIC BASELINE

- Area Profile
- Livelihood Systems
- Land Use
- Vulnerability
- Key Risks