

AFRICAN DEVELOPMENT BANK



PROJECT: GHANA WOMEN AND YOUTH EMPLOYMENT AND SOCIAL COHESION (GWYESCO)

COUNTRY: GHANA

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ENVIRONMENTAL AND SOCIAL SYSTEMS ASSESSMENT

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LIST OF ACRONYMS



AfCTA	African Continental Free Trade Area
AfDB	African Development Bank
CA	Coordination Agency
CEDAW	Convention on the Elimination of All Forms of Discrimination Against Women
CSP	Country Strategy Paper
DLIs	Disbursement-Linked Indicators
DLRs	Disbursement-linked Results
E&S	Environmental and Social
EMPs	Environmental Management Plans
EPA	Environmental Protection Authority
ESSA	Environmental and Social Systems Assessment
FAO	Food and Agriculture Organisation
GBV	Gender-Based Violence
GCX	Ghana Commodity Exchange
GDP	Gross Domestic Product
GEA	Ghana Enterprises Agency
GMMB	Ghana Museums and Monuments Board
GRM	Grievance Redress Mechanism
GSA	Ghana Standards Authority
GSS	Ghana Statistical Service
GWYESCO	Ghana Women and Youth Employment and Social Cohesion Program
ILO	International Labour Organization
IMF	International Monetary Fund
ISS	Integrated Safeguards System
IVA	Independent Verification Agent
LI	Legislative Instrument
LMPs	Labour Management Procedures
M&E	Monitoring and Evaluation



MLGCRA	Ministry of Local Government, Chieftaincy, and Religious Affairs
MMDAs	Metropolitan, Municipal, and District Assemblies
MoE	Ministry of Education
MoF	Ministry of Finance
MoFA	Ministry of Food and Agriculture
MoGCSP	Ministry of Gender, Children and Social Protection
MSMEs	Micro, Small and Medium Enterprises
NADMO	National Disaster Management Organization
NAELP	National Alternative Employment and Livelihood Programme
NEIP	National Entrepreneurship and Innovation Programme
OHS	Occupational Health and Safety
OS	Operational Safeguard
PAP	Programme Action Plan
PPP	Public-Private Partnerships
PWDs	Persons with disabilities
RBF	Results-Based Financing
RCBs	Rural and Community Banks
SDGs	Sustainable Development Goals
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SGBV	Sexual and Gender-Based Violence
SH	Sexual Harassment
SIF	Social Investment Fund
STEM	Science, Technology, Engineering and Mathematics
TVET	Technical and Vocational Education and Training
UNDP	United Nations Development Programme
UNICEF	United Nations Children's Fund
WANEP	West Africa Network for Peacebuilding
YEA	Youth Employment Agency

EXECUTIVE SUMMARY



ES Programme Description

The Ghana Women and Youth Employment and Social Cohesion (GWYESCO) Programme seeks to contribute meaningfully to Ghana's long-term development goals by enhancing resilience and promoting social stability. The overall development objective of the Programme is to enhance the resilience and living conditions of women and youth by fostering economic inclusion and social cohesion through job creation, entrepreneurship, access to finance and skills development. The Programme will then focus mainly of job creation and social cohesion through training in STEM, digital and creative skills, as well as improving access to finance for women- and youth-owned MSMEs. It will also support peace building and social cohesion, particularly in Northern Ghana. The Programme duration is spread over three fiscal years (2026-2028). The specific objectives of the Programme are to: i) invest in women and youth entrepreneurs by promoting access to technical skills, finance and business development services; ii) strengthen the capacity of institutions to undertake M&E and E&S as well as prevent vulnerability to conflict and violent extremism in Northern Ghana; and iii) address challenges related to women and youth unemployment, inequality, poverty, conflicts, and vulnerability to climate change, particularly in Northern Ghana.

The Programme beneficiaries are youth aged 18-35 years and women aged 18 years and above. The targeted geographical areas are Central and Eastern Regions, as well as the Northern Ghana, consisting of Upper West, Upper East, and Savannah Regions. Other Programme beneficiaries include Additionally, strategic institutions will benefit through capacity building to strengthen systems for effective delivery.

The Ghana Women and Youth Employment and Social Cohesion (GWYESCO) Programme (2026 – 2028) will focus on three key outcome areas:

- Skills development to enhance wage & employability;
- Improved access to finance and markets to strengthen women and youth owned MSMEs; and
- Institutional capacity building and policy reforms.

The Programme's activities are organized under three (3) main result areas:

- Result Area 1: Addressing women and youth unemployment, inequality, poverty, conflicts, and vulnerability to climate change, particularly in Northern Ghana;
- Result Area 2: Enhance access to finance, business development services and skills development for women- and youth-owned micro, small and medium enterprises (MSMEs) in Ghana's growth sectors; and
- Result Area 3: Strengthening national operational capacity, practices, sector framework and systems.

The Programme is guided by five (5) sets of Disbursement Linked Indicators (DLIs), which include the following:



- DLI 1: Number of women and youth in wage or self-employment;
- DLI 2: Number of women and youth who have acquired skills in STEM, digital technology, and the creative industries;
- DLI 3: Number of women- and youth-owned MSMEs supported with business and entrepreneurship development services training;
- DLI 4: Number of women- and youth-owned MSMEs with access to finance; and
- DLI 5: Number of institutions with strengthened capacity and integrated risk mitigation systems.

The Ministry of Finance (MoF) will execute the Programme through a designated Coordinating Agency, the Social Investment Fund (SIF), which will be responsible for the day-to-day implementation of the Programme, including training and capacity building of key implementing institutions and stakeholders, as well as undertaking monitoring and evaluation. A Steering Committee will be established to provide strategic direction, review implementation progress and ensure inter-institutional coordination.

The ARB Apex Bank will serve as the financial intermediary, under a tripartite agreement between MoF, SIF and ARB Apex Bank. It will be responsible for managing and disbursing funds under the revolving facility and ensuring compliance with agreed financial procedures. An Independent Verification Agent (IVA) will be contracted to verify the achievement of DLIs. The IVA will audit performance in line with the agreed verification protocol, covering all five DLIs associated with the AfDB financing.

ES E&S Risks Related to the Programme

According to Ghana's Environmental Assessment Regulations 1999, Legislative Instrument (LI) 1652, such interventions as associated with this Programme are not subject to full environmental impact assessment. However, such operations are subject to an initial assessment (and may be required to produce a preliminary environmental report) prior to the issue of an environmental permit and commencement of such renovation works. The Programme is classified as Category 2 in accordance with the Bank's ISS. This classification reflects a low to moderate risk level. Overall, the Programme is anticipated to generate positive environmental and social (E&S) outcomes, particularly through institutional and systems strengthening, as well as its contribution to the achievement of the SDGs. However, the Programme will also pose E&S risks. A summary of the key E&S risks associated with the Programme is presented in the Table 1 below.

Result Area	Activity Focus	Key Environmental Risks	Key Social Risks
Result Area 1: Skills Development for Employability and Job Creation	<ul style="list-style-type: none"> • Apprenticeship & short-term training • Renovation & equipping of TVET centres • STEM, digital & geospatial skills development 	<ul style="list-style-type: none"> • Poor waste management practices including improper treatment/disposal of renovation waste & e-waste generation • Risks of air and noise pollution from renovation works • Risk of increased demand on utilities such as energy and water • Risk of improper disposal of training materials/equipment 	<ul style="list-style-type: none"> • Risk of gender discrimination in skill areas • Risk of injuries (incidents and accidents) related to OHS during practical training • Inclusion challenges for women and Northern youth • Risk of potential community conflict/ grievances on selection processes for beneficiaries
Result Area 2: Access to Finance, Business Development Services and Market Access	<ul style="list-style-type: none"> • Establishment of financing facility • MSME training & formalization • Market access facilitation 	<ul style="list-style-type: none"> • Increased generation of solid waste (packaging, byproducts) • Unsustainable use of resources (e.g., water, energy) 	<ul style="list-style-type: none"> • Exclusion of vulnerable groups (e.g., due to financial illiteracy) • Social tension over fund access or training slots • Poor labour practices in informal MSMEs • Risk of sexual exploitation from women accessing finance
Result Area 3: Institutional Capacity Building, Conflict Resolution, Gender Based Violence and Support to Policy Implementation	<ul style="list-style-type: none"> • Capacity building for five institutions for improved service delivery • District assemblies and local governance institutions strengthened for conflict resolutions • Trainings to prevent Sexual and Gender Based violence and other drivers of fragility 	<ul style="list-style-type: none"> • Risk of noise pollution • Risk of increased demand on utilities such as energy and water use • Risk on environmental sustainability, threat to wildlife and degradation 	<ul style="list-style-type: none"> • Reinforcement of existing power imbalances • Risk of community backlash if institutions are perceived as biased • Inadequate handling of GBV issues • Limited inclusion of women, youth, or vulnerable groups in policy discussions



ES Policy, Legal, Regulatory and Institutional Framework

The 1992 Constitution of Ghana makes overall provision for various environmental and social issues including protection of the environment, protection of labour rights, the rights of vulnerable groups, public health and safety, etc. Beyond the Constitution, there are several national policies, laws and regulations governing specific environmental and social issues. The following table presents the relevant national policy, legal, regulatory and institutional frameworks applicable to the GWYESCO Programme:

Category	National Policies, Legislations, Regulations, Institutions
Environmental Policy and Related Requirements	<ul style="list-style-type: none"> • National Environmental Policy, 2013 • Environmental Sanitation Policy, 2010 • Environmental Protection Act, 2025 (Act 1124) • Environmental Assessment Regulations, 1999 (L.I. 1652) • National Climate Change Policy, 2013 • Hazardous and Electronic Waste Control and Management Act, 2016 (Act 917)
Employment and Skills Development Sector Requirements	<ul style="list-style-type: none"> • National Employment Policy, 2014 • Youth Employment Agency Act, 2015 (Act 887) • Ghana Enterprises Agency Act, 2020 (Act 1043) • National Apprenticeship Policy, 2020 • Ghana's Medium-Term National Development Policy Framework (MTNDPF), 2022-2025 • Coordinated Programme of Economic and Social Development Policies (2021–2025)
Labour, Gender and Human Rights Requirements	<ul style="list-style-type: none"> • Labour Act, 2003 (Act 651) • National Gender Policy, 2015 • Affirmative Action (Gender Equality) Act, 2024 • Persons with Disability Act, 2006 (Act 715)
Health and Safety Requirements	<ul style="list-style-type: none"> • National Health Policy, 2020 • Public Health Act, 2012 (Act 851) • Workmen's Compensation Act, 1987 (PNDCL 187) • Factories, Offices and Shops Act, 1970 (Act 328) • Ghana National Fire Service Act, 1997 (Act 537) • National Workplace HIV/AIDS Policy, 2012 • National HIV and AIDS Policy, 2019 • Ghana's National Strategy for Preventing and Countering Violent Extremism, 2019 • National Peace Council Act, 2011 (Act 818)

Environmental Quality Standards	<ul style="list-style-type: none"> • Ghana Standard on Health Protection - Requirements for Ambient Noise Controls (GS 1222:2018) • Ghana Standard on Environment and Health Protection - Requirements for Ambient Air Quality and Point Source/Stack Emissions (GS 1236:2019)
Institutions	<ul style="list-style-type: none"> • Ministry of Finance (MoF) • Social Investment Fund (SIF) • Youth Employment Agency (YEA) • National Entrepreneurship and Innovation Programme (NEIP) • GRATIS Foundation • ARB Apex Bank • National Alternative Employment and Livelihood Programme (NAELP)



In addition to the national policy, legal and regulatory framework, the country participates in various international conventions and agreements. The following international conventions are applicable to the GWYESCO Programme:

Category	Conventions
Labour rights	<ul style="list-style-type: none"> • Forced Labour Convention, 1930 (No. 29) • Equal Remuneration Convention, 1951 (No. 100) • Discrimination (Employment and Occupation) Convention, 1958 (No. 111) • Working Environment (Air Pollution, Noise and Vibration) Convention, 1977 (No. 148)
Human rights	<ul style="list-style-type: none"> • Convention on the Elimination of All Forms of Discrimination against Women (CEDAW, 1979) • Convention on the Rights of Persons with Disabilities (CRPD, 2006)
Climate change	<ul style="list-style-type: none"> • UN Framework Convention on Climate Change (Rio, June 1992)

At this stage of the Programme, it is assumed that all the Operational Safeguards (OS) are applicable to the Programme, as follows:

- OS 1: Assessment and Management of Environmental and Social Risks and Impacts;
- OS 2: Labour and Working Conditions;
- OS 3: Resources Efficiency and Pollution Prevention and Management;

- OS 4: Community Health, Safety and Security;
- OS 5: Land Acquisition, Restrictions on Access to Land and Land Use and Involuntary Resettlement;
- OS 6: Habitat and Biodiversity Conservation and Sustainable Management of Living Natural Resources;
- OS 7: Vulnerable Groups;
- OS 8: Cultural Heritage;
- OS 9: Financial Intermediaries; and
- OS 10: Stakeholder Engagement and Information Disclosure.



ES Public Consultation

Engagement with stakeholders, particularly the project implementing institutions unearthed insights that informed the assessment of E&S management capacities. The stakeholder consultations were conducted in line with the Bank's ISS. The outcomes of the consultations have been incorporated into the ESSA and the proposed Programme Action Plan. Information will be disclosed on an ongoing basis as appropriate throughout the lifecycle of the Programme, in both English and relevant local languages as necessary, and in a manner that is accessible and culturally appropriate, considering any specific needs of groups including persons with disability and vulnerable. The Final ESSA will be disclosed in-country and through the AfDB's website.

The following stakeholders were consulted:

- Social Investment Fund;
- Environmental Protection Authority;
- Ministry of Finance;
- Youth Employment Agency;
- National Entrepreneurship and Innovation Programme;
- Ministry of Local Government, Chieftaincy and Religious Affairs;
- GRATIS Foundation;
- ARB Apex Bank
- National Alternative Employment and Livelihood Program

ES Assessment of Borrower's E&S System

The assessment of Ghana's E&S management systems in relation to the AfDB's Integrated Safeguards System (ISS) revealed that while the country possesses a generally robust policy and legal framework, there are significant implementation gaps that must be addressed to ensure effective safeguards compliance under the GWYESCO Programme.

Ghana's legal framework – including the Environmental Protection Act (2025), Labour Act (2003), and various social protection and inclusion laws – broadly aligns with the ISS. However,

enforcement remains inconsistent, especially at the district level and within informal sectors. Key gaps include the limited integration of social risks (such as GBV, disability inclusion, and youth protection) into environmental assessment procedures; inadequate institutional capacity for monitoring and enforcement; and fragmented grievance redress mechanisms.



The assessment identified challenges under each relevant Operational Safeguard:

- Environmental and Social Assessment (OS 1): While a foundation exists through EIA processes, there is insufficient attention to social risk management, and weak coordination across agencies;
- Labour and Working Conditions (OS 2): Enforcement of labour protections is weak in informal and MSME sectors, with limited occupational health and safety oversight;
- Resource Efficiency and Pollution Prevention (OS 3): Legal standards are in place, but MSMEs lack the tools and support to adopt sustainable practices;
- Community Health, Safety and Security (OS 4): Risk assessment is fragmented, with limited preparedness for hazards, especially in training and enterprise settings;
- Vulnerable Groups (OS 7): Inclusion policies exist, but there is poor targeting and limited disaggregated data to inform equitable access;
- Cultural Heritage (OS 8): Although there are legal provisions for protecting tangible and intangible heritage, oversight and integration into development processes are weak;
- Financial Intermediaries (OS 9): No binding E&S requirements exist for financial institutions, and Apex Bank lacks a fully operational ESMS, although steps are underway to develop one; and
- Stakeholder Engagement (OS 10): Consultations are largely EIA-focused, with limited participation of women, youth, and vulnerable groups throughout project implementation.

To address these gaps, the recommendations made include improving inter-agency coordination; recruiting and training dedicated E&S personnel within implementing institutions; simplifying safeguards tools for MSMEs; institutionalising inclusive stakeholder engagement processes; and establishing or strengthening grievance redress systems accessible to all beneficiaries.

ES Assessment of E&S Capacity of Implementing Agencies

The institutional capacity assessment examined the environmental and social (E&S) readiness of the Social Investment Fund (SIF) and key partner institutions involved in implementing the GWYESCO Programme. While most institutions demonstrate operational experience and some relevant systems, significant gaps exist in dedicated E&S staffing, safeguards integration, and inter-agency coordination.

SIF, the lead coordinating agency, has strong monitoring systems and functional Grievance Redress Mechanisms, but lacks dedicated E&S staff—though recruitment is planned. The Youth

Employment Agency (YEA) and the National Entrepreneurship and Innovation Programme (NEIP) both lack E&S capacity, with no dedicated personnel or systems to manage safeguards risks. NEIP's GRM is limited to internal staff, excluding Programme beneficiaries.



The GRATIS Foundation has moderate capacity in occupational health and safety but requires expanded safeguards coverage and staff training. ARB Apex Bank, acting as the financial intermediary, has initiated steps toward establishing an Environmental and Social Management System (ESMS), but full operationalization and staff capacity development are needed to meet AfDB requirements.

The Environmental Protection Agency (EPA) is well-positioned to provide regulatory oversight but faces logistical challenges in ensuring compliance at regional and district levels. Additionally, enforcement of safeguards among public institutions remains weak due to perceptions of intra-governmental leniency, which undermines the EPA's authority and hinders effective safeguards implementation.

Strengthening E&S capacity across implementing partners, institutionalizing safeguards processes, and improving inter-agency coordination will be critical to ensuring that the GWYESCO Programme meets its environmental and social obligations under the Bank's Integrated Safeguards System.

ES Assessment of Reputational Risk to the Bank

The GWYESCO Programme is laudable, with objectives that align closely with the strategies of both the Government of Ghana and the Bank. However, if the Programme fails to perform satisfactorily from an E&S perspective, it could pose a reputational risk to the Bank. This reputational risk may arise from the following areas:

- Weak environmental and social management capacity.
- Risk of exacerbating local conflicts
- Unrealised gender equity outcomes
- Inadequate grievance redress and stakeholder engagement

ES Action Plan

Based on the outcome of the assessment of the E&S capacity of the implementing entities, actions to address the gaps in the E&S management systems of the implementing agencies have been recommended. The plan (Table 2) includes assigned responsibilities for implementation, indicative timelines, budget estimates, and indicators for measuring the completion of these actions

Table 2 *Programme Action Plan*



No.	Issues/Risks	Action Description	Responsibility	Timing	Cost (USD)	Completion Measurement
1.	Inadequate E&S risk management capacity	Strengthen the capacity of key project staff and implementing partners through structured training sessions on AfDB's OSs and Ghana's EA Regulations to ensure effective E&S risk management, thereby enhancing institutional capacity and integrated risk mitigation systems, in accordance with DLI 5	MoF and SIF	Within the first 6 months of Implementation	40,000	Training reports, number of trainings conducted, and percentage of staff trained
2	Health and Safety Certification	Support partner institutions such as GRATIS Foundation in training officers on Occupational Health and Safety programs. This will enhance the officers' capacity to effectively supervise training activities and help prevent or minimize injuries.	GRATIS Foundation, YEA	Before training commence	40,000	Certificate of participation
3	Weak stakeholder engagement	Develop and implement a comprehensive SEP at national and district/municipal levels to foster transparency and continuous dialogue, supporting institutional strengthening and inclusive participation of all relevant groups, aligned with DLI 5	SIF, MLGCRA and YEA	Within the first 3 months of Implementation	20,000	SEP developed and implemented, and stakeholder feedback recorded
4	Occupational health and safety risks during renovation works	Prepare Labour Management Procedures (LMPs) aligned with OS 2, ensure strict adherence to occupational health and safety standards, and orient contractors and workers on safe practices to safeguard workers during renovation activities, promoting safe wage or self-employment opportunities for women and youth, consistent with DLI 1	SIF	Before renovation works commence	20,000	LMP prepared, OHS plans implemented, and incident reports monitored

No.	Issues/Risks	Action Description	Responsibility	Timing	Cost (USD)	Completion Measurement
5	Gender inequality and exclusion of vulnerable groups	Mainstream gender equality and social inclusion across all activities including skills development, entrepreneurship, and MSME support to increase participation and benefits for women, youth, and vulnerable groups, boosting the number of beneficiaries acquiring STEM, digital, and creative skills, receiving business development training, and accessing finance, as targeted under DLIs 2, 3, and 4	SIF, YEA , NAELP and NEIP	Throughout the Programme implementation	30,000	Inclusion metrics tracked and participation of target groups documented
6	Grievance Redress Mechanism	Establish an effective GRM. SIF already has a functional and effective GRM with tollfree numbers. This should be adopted for the Project and training provided for all other stakeholders thereby supporting transparency and institutional capacity building in line with DLI 5.	SIF	Continuous	15,000	GRM established and number of complaints received/resolved
7	Weak E&S monitoring and compliance	Designate E&S Focal Persons/Specialists at the regional level to oversee monitoring and compliance with E&S requirements, reinforcing institutional systems and risk mitigation throughout implementation, contributing directly to DLI 5	MoF and SIF	Focal Persons to be assigned at the Programme inception and maintained throughout implementation	40,000	E&S Focal Persons/Specialists at post and E&S monitoring reports produced quarterly
8	Inadequate awareness of Programme opportunities at the community level	Conduct targeted outreach campaigns focused on youth, women, and vulnerable groups to increase awareness and participation in skills development and entrepreneurship, increasing the number of people acquiring relevant skills and business services, as specified in DLIs 2 and 3	SIF	Continuous	40,000	Outreach materials distributed and awareness events conducted
9	Poor coordination among stakeholders	Institutionalize quarterly multi-stakeholder coordination meetings to review progress, share lessons, and promptly resolve issues, strengthening overall Programme management and institutional capacity consistent with DLI 5	SIF	Quarterly	40,000	Meeting minutes documented and action plans followed up

No.	Issues/Risks	Action Description	Responsibility	Timing	Cost (USD)	Completion Measurement
10	Limited access to finance for MSMEs	Establish stronger linkages with financial institutions, provide financial literacy training, and support women- and youth-led MSMEs to improve access to finance, increasing the number of MSMEs with financial support in line with DLI 4	SIF and ARB Apex Bank	Continuous	30,000	Number of MSMEs accessing finance and training records
11	Lack of sustainability post-program	Develop and implement exit and sustainability strategies for supported businesses and training initiatives to ensure lasting benefits and continued MSMEs growth beyond the Programme, supporting overall employment growth and institutional strengthening consistent with DLIs 1 and 5.	SIF, NEIP, YEA, NAELP and GRATIS Foundation	Final year of the Programme	30,000	Exit strategy document prepared and sustainability measures adopted

ES Programme Monitoring and Evaluation Plan

The Coordinating Agency, SIF, will be responsible for data collection, M&E of project activities, outputs, and outcomes. These efforts will be guided by the DLIs and reported to the SIF for onward submission to the Bank through the MoF. To ensure all stakeholders are informed of implementation progress, the Coordinating Agency will submit quarterly E&S report since the Project is classified as Category 2. The Bank will conduct missions twice a year to ensure compliance with the E&S requirements.

SECTION 1: PROGRAMME DESCRIPTION AND E&S RISKS



1. INTRODUCTION

1.1 Background

Ghana has maintained a relatively stable political environment since the reintroduction of multiparty democracy in 1992. The country has conducted successive peaceful elections that have resulted in smooth transitions of power between competing political parties. This political maturity is underpinned by strong democratic institutions, a vibrant civil society, and a free press, which collectively help to reinforce national cohesion and accountability in governance. Notably, civil society groups have played a critical role in promoting electoral integrity and discouraging political violence. However, challenges such as the underrepresentation of women in politics persist, highlighting the need for more inclusive governance frameworks.

Despite Ghana's democratic progress, its economy remains vulnerable due to structural limitations. The Ghanaian economy is subject to fluctuations from global shocks and climate variability. Economic growth decelerated to 2.9% in 2023 due to the lingering effects of the COVID-19 pandemic and global financial tightening. In response, the Government of Ghana has embarked on a series of economic reforms, supported by the International Monetary Fund (IMF), aimed at fiscal consolidation and debt reduction. Early signs of recovery are evident, with Gross Domestic Product (GDP) growth rebounding to 5.9% in 2024, driven largely by increased output in oil and gas (8.1%) and agriculture (5.1%), although the cocoa sector continues to face challenges.

Ghana has also made progress in managing its macroeconomic indicators. Public debt decreased from 92.7% of GDP in 2022 to 84.9% in 2023, following the implementation of the Domestic Debt Exchange Programme. Concurrently, the current account balance improved significantly, recording a surplus of 3.6% of GDP in 2024 compared to a deficit of 1.7% in 2023. This positive trend is expected to continue into 2025, buoyed by high global gold prices and a projected rebound in cocoa production.

Socially, the country grapples with high levels of youth unemployment and underemployment. This was recorded at over 14% and 50% respectively by the end of 2024. The impact of the COVID-19 pandemic on employment was particularly severe for Micro, Small and Medium Enterprises (MSMEs), many of which are operated by women, leading to over 329,000 job losses. The government has recognized the urgent need for job creation, aiming to generate 300,000 new jobs annually as part of its Medium-Term Expenditure Framework (2024–2027) and 2025 Budget Policy.



In addition to economic challenges, Ghana faces pockets of fragility, particularly in the northern regions. Issues such as chieftaincy disputes, farmer-herder conflicts, and ethnically driven violence undermine social cohesion and stability. Conflicts like the protracted Bawku crisis have escalated insecurity and facilitated the spread of small arms and light weapons, complicating development efforts in the area.

In response to these complex challenges, the Government of Ghana has prioritized initiatives aimed at human capital development, economic inclusion, and private sector growth. These priorities are reflected in key policy frameworks such as the Coordinated Programme of Economic and Social Development Policies (2021–2025) and the Medium-Term National Development Policy Framework (2022–2025). The recent launch of the USD 10 billion "Big Push" infrastructure plan and the 24-Hour Economy initiative in March 2025 further reinforces the government's commitment to addressing youth unemployment and enhancing economic opportunities.

Against this backdrop, the proposed project aligns with the national agenda by leveraging results-based financing (RBF) to address skills development, entrepreneurship, and employment generation. It adopts an integrated, inclusive, and participatory approach, emphasizing relevance to beneficiaries, efficiency in resource utilization, and effectiveness in addressing socio-economic disparities. Through coordinated governance and stakeholder engagement, the Ghana Women and Youth Employment and Social Cohesion (GWYESCO) Programme seeks to contribute meaningfully to Ghana's long-term development goals while enhancing resilience and social stability.

1.2 Programme Description

The Programme aims to support existing women- and youth owned MSMEs for growth and formalization across three result areas, including: (i) Addressing women and youth unemployment, inequality, poverty, conflicts, and vulnerability to climate change, particularly in Northern Ghana; (ii) Improving access to finance, business services and skills development for women- and youth-led micro, small and medium enterprises (MSMEs) in Ghana's growth sectors; and (iii) Strengthening national operational capacity, practices, sector framework and systems. These objectives will be achieved through interventions such as capacity building, skills training, provision of low-cost finance and the renovation of selected TVET and tertiary institutional infrastructure, among other initiatives

1.3 Programme Development Objective

The overall development objective of the project is to enhance the resilience and living conditions of women and youth by promoting economic inclusion and social cohesion through job creation, entrepreneurship, access to finance and skills development. The project's specific objectives are:

- I. To invest in women and youth entrepreneurs by promoting access to technical skills, finance and business development services, and

- II. To strengthen the capacity of institutions to undertake M&E and E&S as well as prevent vulnerability to conflict and violent extremism in Northern Ghana.



1.4 Programme Scope

The Programme has a nationwide scope, with a targeted focus on the northern areas of the country, including the Upper West, Upper East, and Savannah Regions. Additional focus areas include the Central and Eastern Regions. The key beneficiaries of the project are women and youth. To ensure adequate gender inclusion, the Programme aims to reach at least 50% women and actively targets Persons with Disabilities (PwDs).

1.5 Programme Activities

The Programme activities are organized under three (3) main result areas:

- Result Area 1: Addressing women and youth unemployment, inequality, poverty, conflicts, and vulnerability to climate change, particularly in Northern Ghana;
- Result Area 2: Enhancing access to finance, business services and skills development for Women- and Youth-owned micro, small and medium enterprises (MSMEs) in Ghana's growth sectors; and
- Result Area 3: Strengthening national operational capacity, practices, sector framework and systems.

The Programme is guided by five (5) sets of Disbursement Linked Indicators (DLIs), which include the following:

- DLI 1: Number of women and youth in wage or self-employment (direct jobs);
- DLI 2: Number of women and youth who have acquired skills in STEM, digital technology, and the creative industry skills;
- DLI 3: Number of women- and youth-owned capacitated with business development services training (cumulative);
- DLI 4: Number of women- and youth-owned MSMEs with access to finance; and
- DLI 5: Number of institutions whose capacity and integrated risk mitigation systems have been strengthened (cumulative)

1.6 Result Areas

1.6.1 Result area 1: Addressing Women and youth unemployment, inequality, poverty, conflicts, and vulnerability to climate change, particularly in Northern Ghana

This is an integrated area through which the Programme seeks to address the issue of employment for women and youth. The expected results of this area are: (i) create 4,500 direct jobs and 7,500 indirect jobs; (ii) rehabilitate and equip 10 TVET centers for training; (iii) organize training in



STEM, Digital and creative skills, and other trades such as coding and generative artificial intelligence for 28,000 women and youth; (iv) organize training for 5,000 women and youth on rural activities such as poultry including guinea fowls, fisheries, livestock, beekeeping, responsible cooperative mining, etc.; (v) integrate modules on peace building and social cohesion, climate change, business management, financial and digital literacy in all trainings; and (vi) provide post-training support to trainees for entrepreneurship, self-employment or wage employment.

1.6.2 Result area 2: Enhancing access to finance, business services and skills development for Women- and Youth-owned micro, small and medium enterprises (MSMEs) in Ghana's growth sectors

This area covers the following results: (i) provide training to 10,000 MSMEs in partnership with partners such as the National Entrepreneurship and Innovation Programme (NEIP), GRATIS Foundation, NAELP. This involves strengthening entrepreneurial skills development in areas such as marketing and market research, strategic planning, product development, and customer relationship management and business formalization as well as connections to business-enhancing digital technologies and strengthening the enabling environment; (ii) establish 100 business-to-business linkages between MSMEs and large enterprises; (iii) establish a financing facility through signing of an agreement with ARB APEX Bank to finance MSMEs; and (iv) provide access to finance to 8,000 MSMEs.

1.6.3 Result area 3: Strengthening national operational capacity, practices, sector framework and systems

Results in this area include: (i) build capacity of five (5) institutions for improved operations and service delivery; (ii) strengthen the capacity of 530 district assemblies' members and local governance institutions to resolve conflicts and prevent violence and other drivers of fragility, to prevent Sexual and Gender Based Violence as well as prevent early marriage; (iii) implement the technical, E&S, fiduciary, environmental capacity-building plan.

1.7 Scope of the Result Areas

The Table 1.1 below outlines the scope of the key results areas under the project, detailing the expected outcomes and the corresponding geographic focus.

Table 1.1 Scope of Result Areas

EXPECTED RESULTS	GEOGRAPHIC SCOPE
Result area 1: Addressing Women and youth unemployment, inequality, poverty, conflicts, and vulnerability to climate change, particularly in Northern Ghana	
4,500 direct jobs and 7,500 indirect jobs created	All project geographic areas



10 TVET centers rehabilitated and equipped	Central and Eastern Regions of Ghana, the Northern Ghana consisting of Upper West, Upper East, and Savannah Regions
Organized training in STEM, Digital and creative skills, and other trades such as coding and generative artificial intelligence for 28,000 women and youth	Central and Eastern Regions of Ghana, the Northern Ghana consisting of Upper West, Upper East, and Savannah Regions
Organized training on rural activities such as poultry including guinea fowls, fisheries, livestock, beekeeping, responsible cooperative mining for 5,000 women and youth	Central and Eastern Regions of Ghana, the Northern Ghana consisting of Upper West, Upper East, and Savannah Regions
Integrated modules on peace building and social cohesion, climate change, business management, financial and digital literacy in all trainings	Central and Eastern Regions of Ghana, the Northern Ghana consisting of Upper West, Upper East, and Savannah Regions
Post-training support provided to trainees for entrepreneurship, self-employment or wage employment	Central and Eastern Regions of Ghana, the Northern Ghana consisting of Upper West, Upper East, and Savannah Regions
Result area 2: Enhancing Access to finance, business services and skills development for Women- and Youth-owned micro, small and medium enterprises (MSMEs) in Ghana's growth sectors	
10,000 MSMEs provided with training on entrepreneurial skills development in areas such as marketing and market research, strategic planning, product development	Central and Eastern Regions of Ghana, the Northern Ghana consisting of Upper West, Upper East, and Savannah Regions
100 business-to-business linkages established between MSMEs and large enterprises	Central and Eastern Regions of Ghana, the Northern Ghana consisting of Upper West, Upper East, and Savannah Regions
A financing facility established through signing of an agreement with ARB Apex Bank to finance MSMEs	Central and Eastern Regions of Ghana, the Northern Ghana consisting of Upper West, Upper East, and Savannah Regions
Access to finance provided to 8,000 MSMEs	Central and Eastern Regions of Ghana, the Northern Ghana consisting of Upper West, Upper East, and Savannah Regions
Result area 3: Strengthening national operational capacity, practices, sector framework and systems	
Capacity of 5 institutions built for improved service delivery	Central and Eastern Regions of Ghana, the Northern Ghana consisting of Upper West, Upper East, and Savannah Regions
The capacity of 530 district assemblies' members and local governance institutions (at the district level) strengthened to resolve conflicts and prevent violence and other drivers of fragility, to prevent Sexual and Gender Based Violence as well as prevent early marriage;	Central and Eastern Regions of Ghana, the Northern Ghana consisting of Upper West, Upper East, and Savannah Regions



Technical, E&S, fiduciary, environmental capacity-building plan implemented	Central and Eastern Regions of Ghana, the Northern Ghana consisting of Upper West, Upper East, and Savannah Regions
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1.8 Programme Duration

The GWYESCO Programme spans three fiscal years (2026–2028) (Please cross check) for the achievement of Disbursement-Linked Indicators (DLIs), with 2029 as the final year for disbursements. The Republic of Ghana has requested UA 52.24 million (equivalent to USD 68.9 million) in financing from the Bank, representing 17.0% of the total funding for the government’s Programme. The overall sector allocations, coordinated by the Ministry of Finance and forming the basis of the GWYESCO Programme, amount to GH¢5.215 billion (approximately USD 336.5 million). (To be confirmed)

1.9 Programme Design and Consultation Process

The Programme design is the result of extensive consultations with various technical partners and civil society, focusing on adopting operational innovations to maximize the impact of the interventions. Discussions were held with the Ministry of Finance (MoF), the recipient and Executing Agency, which has designated the Social Investment Fund (SIF) as the Coordinating Agency, alongside the Youth Employment Agency (YEA), National Entrepreneurship and Innovation Programme (NEIP), GRATIS Foundation, National Alternative Employment and Livelihood Empowerment Programme (NAELP) and the ARB Apex Bank.

The Programme design is grounded in the following principles: (i) leveraging national and international best practices; (ii) conducting an institutional analysis of implementation capacities; (iii) fostering a results-based management culture; (iv) strengthening public-private partnerships (PPP) in support services for job seekers and entrepreneurs; and (v) integrating opportunities within promising local value chains.

1.10 Project Justification

The proposed GWYESCO Programme is timely and strategically relevant, responding directly to Ghana’s pressing challenges of youth unemployment, economic informality, regional disparities, and fragility in northern regions. Anchored in both national development frameworks and the African Development Bank’s strategic priorities, the project seeks to bolster inclusive economic growth and promote social resilience through skills development, entrepreneurship, and institutional strengthening.

The government’s current economic agenda prioritizes job creation, structural transformation, and private sector-led growth, as detailed in key policy documents such as the Coordinated Programme of Economic and Social Development Policies (2021–2025) and the Medium-Term National

Development Policy Framework (2022–2025). The GWYESCO Programme aligns with these ambitions by providing targeted support to women and youth that are disproportionately affected by unemployment, informality, and exclusion from decision-making and economic participation.



Sectorally, Ghana’s MSMEs sector, which employs the majority of the population, is plagued by low productivity, informality (about 70% operate without legal status), limited access to finance, and inadequate entrepreneurial and technical skills. These issues are particularly acute in northern Ghana, where climate vulnerability, historical underdevelopment, and social tensions exacerbate economic exclusion. Unemployment rates in the north range between 36–49% for males and 37–47% for females, revealing both gender and spatial inequalities that the project is designed to address.

The project leverages government reforms such as the Ghana Enterprises Agency (GEA) Act, 2020 (Act 1043), the establishment of the Ministry of Youth Development and Empowerment, and the launch of major economic Programmes like the Big Push, Adwumawura Programme, and the National Apprenticeship Programme. Through its focus on (i) vocational and technical training, (ii) entrepreneurial and digital skills development, (iii) access to finance, and (iv) social cohesion in fragile regions, GWYESCO will complement and deepen the impact of these initiatives. It also complements interventions from development partners including the World Bank, GIZ, and Mastercard Foundation.

Furthermore, the project is fully aligned with the African Development Bank (AfDB) Country Strategy Paper (CSP) 2024–2029, particularly Priority Area 1, which emphasizes human capital development, improved governance, and private sector growth. It responds directly to the Bank’s “High 5” priority to Improve the quality of life for the people of Africa, as well as to strategic themes under the Ten-Year Strategy (2023–2032) and the Jobs for Youth in Africa Strategy (2016–2025).

1.11 Environmental and Social Requirements

The GWYESCO Programme is being prepared using the RBF instrument at the request of the Government of Ghana (see Appendix 1 for the official request letter). In accordance with the African Development Bank’s Integrated Safeguards System (ISS), an Environmental and Social Systems Assessment (ESSA) is required. The ESSA is the appropriate tool for conducting environmental and social due diligence in RBF operations, where financing is tied to the achievement of measurable results rather than traditional inputs.

1.12 Scope of the ESSA

The ESSA assesses the adequacy and performance of the Government of Ghana’s Environmental and Social (E&S) systems in managing risks associated with the Programme’s disbursement-linked results (DLRs). This was conducted in accordance with the Bank’s ISS, the ESSA examines

how well national, sectoral, and institutional frameworks align with the Bank's environmental and social principles, and their effectiveness in ensuring that Programme implementation promotes sustainable development outcomes.



Specifically, the ESSA:

- Reviewed the policy, legal, regulatory, and institutional frameworks applicable to environmental and social management in Ghana, especially within agencies involved in implementing the GWYESCO Programme.
- Evaluated the implementation capacity of key institutions responsible for identifying, assessing, managing, and monitoring environmental and social risks.
- Examined the extent to which existing systems enable screening, impact identification, mitigation, monitoring, stakeholder engagement, and grievance redress throughout the Programme lifecycle.
- Identified gaps or weaknesses in the E&S system that may limit its effectiveness under an RBF operation, where funds are released upon achievement of results rather than inputs or expenditures.
- Recommended actions to strengthen systems and institutional capacity, including risk mitigation measures and performance improvements aligned with the ISS principles.

1.13 Objectives of the ESSA

The objective of conducting the ESSA is to evaluate the adequacy and effectiveness of the borrower's environmental and social management systems including policies, legal frameworks, institutional capacities, and implementation practices. This is to ensure that E&S risks associated with the RBF Programme are properly identified, managed, and mitigated.

Specifically, the ESSA aims to:

1. Assess the extent to which the Ghana's systems align with the Bank's environmental and social principles under the ISS.
2. Identify potential E&S risks linked to the Programme's activities and results.
3. Assess the capacity of institutions responsible for managing these risks, including gaps and weaknesses.
4. Recommend gap filling measures to strengthen systems and build institutional capacity to ensure effective risk management throughout Programme implementation.
5. Support the achievement of sustainable development outcomes by integrating E&S considerations into the core of the Programme's design and delivery.

1.14 Approach of the ESSA

The ESSA was undertaken by the Bank using a systematic and participatory methodology. The process included a comprehensive review of existing Programme documents, relevant technical literature, and national legal and institutional frameworks. These desk-based reviews were

complemented by interviews and extensive consultations with key stakeholders at various levels to gather insights on the environmental and social systems relevant to the Program.



An environmental and social risk screening was conducted at the concept stage of the Program. This screening served two main purposes: first, to ensure that proposed Programme activities do not include any that fall under the exclusion criteria defined under AfDB's Result-Based Financing (RBF) instrument; and second, to define the initial scope of the ESSA. This involved identifying the applicable environmental and social systems within the country and mapping out relevant institutions and stakeholders for further engagement and dialogue.

The ESSA process was guided by the AfDB's Policy on Result-Based Financing, which outlines key environmental and social principles and planning requirements to ensure that RBF operations are implemented in a manner that maximizes development outcomes while avoiding, minimizing, or mitigating potential adverse environmental and social risks. The preparation of the ESSA was also guided by the requirements of the ISS.

1.15 Programme Implementation and Executing Agencies

The GWYESCO Programme will be executed by the MoF, which will designate the Social Investment Fund (SIF) as the Coordinating Agency. The MoF will exercise oversight over SIF as its supervisory ministry. The Executive Director of SIF will serve as the primary liaison between the MoF and the Bank. The Coordinating Agency will comprise the following key staff, aligned with the Programme's thematic areas:

- An Executive Director/Project Manager (overall coordination and consolidation);
- An Officer for TVET and Skills Development (Outcome Area 1);
- An Entrepreneurship and MSME Development Officer (Outcome Area 2);
- A Monitoring and Evaluation Officer;
- A Procurement Officer;
- A Financial Management Officer;
- An Environmental, Climate and Social Safeguards Officer
- Gender and Change Officer; and
- A Micro-Finance and Access to Finance Officer.

Other Supporting Staff Include:

- Administrative Officer
- Internal Auditor
- Administrative Assistant
- Procurement Assistant
- IT Officer
- Other support Staff



A Programme Steering Committee will be established, chaired by the Minister of Finance or their representative, and will include representatives from key stakeholder ministries and agencies. The Steering Committee will meet twice a year to provide strategic direction, review implementation progress, and ensure inter-institutional coordination. The Executive Director/Project Manager will serve as the Committee Secretary. The Ministry of Finance will be represented by two officials: the Director of External Resource Mobilization (ERM) and the Head of the AfDB/IFAD Unit.

The ARB Apex Bank will act as the financial intermediary through a tripartite agreement between MoF/SIF/ARB Apex Bank, responsible for managing and disbursing funds under the revolving facility and ensuring compliance with agreed financial procedures.

The Coordinating Agency will be responsible for the day-to-day implementation of the project and the capacity building of key implementing institutions and stakeholders. It will coordinate all activities across the three Outcome Areas and prepare regular project implementation reports. These reports will be submitted to the MoF by the Executive Director of SIF and transmitted to the Bank through the Ministry of Finance.

An Independent Verification Agent (IVA) will be contracted to verify the achievement of DLIs. The IVA will audit performance in line with the agreed verification protocol, covering all five DLIs associated with the AfDB financing.

1.16 RBF Program's E&S Categorization

The Programme is classified as a Category 2 (Moderate risk) project according to the AfDB's ISS requirements. The categorization memorandum validated in ISTS and the E&S risk category updated in SAP on 16.05.2025. All investments likely to be classified as high E&S risk (Category 1), according to the Bank's ISS, are not eligible under this Programme and/or RBF financing. In addition, ESDD during the categorization also confirmed the Programme will not engage in activities listed under the Bank's Negative List and the Banks E&S Exclusion List.

1.17 Monitoring and Evaluation

The Coordinating Agency will be responsible for data collection, M&E of project activities, outputs, and outcomes. These efforts will be guided by the DLIs and reported by the SIF for onward submission to the Bank through the MoF. To ensure all stakeholders are kept informed of implementation progress, the Coordinating Agency will submit quarterly E&S reporting since the Project is classified as Category 2. Missions will be conducted twice yearly by the Bank to ensure compliance with the E&S requirement.



1.18 General Country Information

Ghana is located along the coast of the Gulf of Guinea in the sub-Saharan Africa. The country's geographical coordinates extend between 7.9465° N, 1.0232° W, covering a total area of 238, 533 km². This accounts for 227,533 km² of land area with an Exclusive Economic Zone (EEZ) constituting an additional 11,000 km² of the sea to the territorial area. Its coastline also expands 538km along the Atlantic Ocean. Ghana is bordered by Burkina Faso to the north, Togo to the east, and to the west by Cote d'Ivoire. The country is divided into 16 administrative regions and 261 metropolitan, municipal, and district assemblies (MMDAs).

1.19 Physical Environment

1.19.1 Climate and Variations

Ghana has a tropical climate with two distinct climatic zones. Southern Ghana experiences a bimodal rainfall pattern, with two rainy seasons occurring from March to July and September to November. In contrast, northern Ghana follows a unimodal pattern, characterized by a single rainy season from May to October, followed by a prolonged dry season dominated by Harmattan winds from November to April.

Annual rainfall ranges from over 2,000 mm in the south-western forest zone to less than 1,000 mm in the northern savannah zone. Temperatures are relatively high across the country, typically ranging between 26°C and 32°C.

1.19.2 Topography and Geology

The topography of Ghana is characterized by plains, forested plateaus and undulating lowlands. The coastal plains lie in the southern part of the country. Plateaus in the transition belt, and undulating mountains in the north. Land elevations range from sea level to 883m as highest altitude

Geologically, Ghana lies within the West African Craton. It predominantly consists Precambrian crystalline rocks that are metamorphosed into the Birimaian, Tarkwaian and Togo Rocks. It is underlain by granite, schist and gneiss. These rocks significantly contribute to the groundwater occurrence, distribution and other hydrogeological properties of soils across Ghana. Intrusions occurring in the Birimian greenstone and Tarkwaian rocks are largely associated with gold and other mineral deposits across the country.

The Voltaian Sedimentary Basin, which consists of 40% of Ghana's geology is underlain by sandstone, mudstone, shale and limestones that are located the northeastern and southeastern part of Ghana. The variation in the regolith of the Voltaian Basin contributes to soil composition, structure and texture.



1.19.3 Water Resources

Ghana has two major categories of water resources: surface water and groundwater. The Volta River Basin and its tributaries, namely the White Volta, Black Volta, Daka, and Oti rivers account for approximately 70% of the country's surface water resources. The southwestern river system, consisting of the Pra, Tano, and Ankobra rivers, contributes about 22%, while the coastal river systems including the Densu and Ayensu rivers contribute the remaining 8%.

In the northern belt of Ghana, groundwater occurrence, distribution, and hydrogeological characteristics are largely influenced by faults and fractures in Precambrian rock formations. Conversely, in the coastal regions, aquifers within the coastal sedimentary deposits serve as the main sources of groundwater. During prolonged droughts in the northern regions, groundwater is accessed through dugouts and boreholes for both domestic and agricultural use. In addition to these natural water resources, dams and impoundments have been constructed on various surface water basins to support hydroelectric power generation, irrigation, and ecological conservation.

1.20 Biological Environment

1.20.1 Vegetation and Ecosystem

Vegetation in the northern part of Ghana predominantly consists of grasslands and woodlands, with sparse drought resistant trees such as silk cotton, shea tree, locust bean and baobab. The region has an ecologically diverse ecosystem which is integral to the socio-economic wellbeing of its inhabitants. Notably, the Mole National Park in the Savannah Region is inhabited by a wide range of mammals, endangered bird species and reptiles.

The southwestern belt is characterised by the tropical rainforest which comprises of dense forests with high biodiversity, while the southeastern coastal plains are characterised by red and white mangroves, low woody trees, and shrubs. The southern part of Ghana is ecologically rich in both terrestrial and aquatic fauna and flora. Located in this region are major protected areas such as the Kakum National Park, and Bia National Park, which are relevant to biodiversity conservation in Ghana.

1.21 Socio-Economic Conditions

1.21.1 Demographic

Ghana has a population of approximately 33.5 million as of 2023, with an average annual growth rate of 2.1% (GSS, 2023). The population is youthful, with about 56% under the age of 25 and a median age of 21.5 years, reflecting high fertility and declining mortality rates (UNDP, 2021). This youth bulge presents both opportunities and challenges for development and employment.

Women make up 50.7% of the national population. Despite gains in gender equality, significant disparities remain in employment, access to education, and economic opportunities, particularly

in rural areas (GSS, 2021a). Approximately 44.1% of the population resides in urban areas, with the remaining 55.9% in rural communities (GSS, 2021b).



The national literacy rate stands at 79% for males and 68% for females aged 15 and above, indicating a gender gap in educational attainment (GSS, 2021a). National unemployment is estimated at 13.4%, but youth unemployment is significantly higher, especially among females (World Bank, 2022).

These five northern regions collectively account for about 17% of Ghana's total population, yet they are among the most underdeveloped in terms of infrastructure, education, and healthcare (GSS, 2021b). The regions are predominantly rural, with rural population ratios exceeding 80% in areas like the Upper West and North-East regions (GSS, 2021b). The youth population is particularly significant. In the Northern Region, for example, over 60% of residents are under the age of 30, a statistic that aligns with high fertility rates (GSS, 2021b). High dependency ratios in these areas place additional strain on limited household incomes and public services.

1.21.2 Employment and Livelihoods

Ghana's economy is largely informal, with over 80% of the labour force engaged in informal employment, particularly in agriculture, trade, and small-scale manufacturing (GSS, 2022). The national unemployment rate stood at 13.4% in 2021, with youth unemployment (ages 15–35) reaching nearly 20%, highlighting a critical challenge for inclusive growth (World Bank, 2022).

Although the services sector employs the largest share of workers nationally, agriculture remains the leading source of employment, especially in rural areas. Women and youth are disproportionately represented in low-paying, vulnerable employment, with limited access to social protection and skills development opportunities (GSS, 2022; UNDP, 2021).

In northern Ghana, livelihoods are heavily dependent on rain-fed agriculture, animal husbandry, petty trading, and seasonal migration. Agriculture employs over 70% of the economically active population in these regions, but productivity remains low due to poor access to inputs, climate variability, and limited mechanization (MoFA, 2020).

Women are heavily involved in post-harvest processing, shea butter production, and small-scale trade, yet face significant constraints including lack of land rights, credit, and access to extension services (FAO, 2020). Youth, especially those with limited education, often engage in insecure or seasonal labor. Many migrate to southern cities to work as porters (kayayei), drivers' assistants, or informal vendors, exposing them to exploitation and health risks (Awumbila, 2015).

1.21.3 Women and Gender Inclusion

Ghana's population is dominated females, accounting for approximately 50.1% of the total population of Ghana. However, women are continually underrepresented in decision making at

both local and national levels. With a gender index of 0.505, Ghana is reportedly one of the many African countries with a remarkable disparity between women and men. Out of the 123 government institutions, only 19 are headed by female, accounting for 15% of the total.



Ghana's commitment to women inclusion and gender equality is enshrined in the 1992 constitution, which guarantees human rights and freedom, devoid of gender discrimination. At international levels, Ghana is a signatory to the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), adopted by the UN General Assembly in 1979, and the Beijing Declaration and Platform for Action in 1998, focused on bridging the gender gap and promoting women inclusion and empowerment.

Ghana continues to make strong institutional efforts aimed at addressing gender disparity in both public and private sectors. Notably, the Ministry of Gender, Children and Social Protection in Ghana initiated the National Gender Policy in 2015 which focused on mainstreaming women's participation and empowerment concerns into the national development process. In addition, the Parliament of Ghana in 2024, enacted the Affirmative Action Plan which outlines specific actions targeted at achieving 50% gender equity in the workforce by 2028.

Remarkably, the number of women in Ghana's politics and leadership has increased marginally over time, yet it remains low. Women representation in Ghana's parliament increased from 29 (11%) in 2012 to 40 (14.5%) in 2024, out of the 276 Members of Parliament. Although this represents the highest figure recorded in the country's history, it falls short of the affirmative action directive of 50%.

1.21.4 Education and Skills Infrastructure

Ghana has made notable progress in improving access to basic education, with Gross Enrollment Rates at the primary and junior high school levels exceeding 95% and 85%, respectively (GSS, 2022). However, transition rates to senior high school (SHS) and tertiary education remain a challenge, especially for students from rural and low-income households. The national literacy rate is 76.6% for males and 67.1% for females aged 15 years and older (GSS, 2021).

Despite high enrolment, the quality of education remains a concern due to teacher shortages, inadequate learning materials, and overcrowded classrooms. The Basic Education Certificate Examination (BECE) pass rates vary widely, and learning outcomes in public schools are often lower than national averages (Ministry of Education 2020). TVET (Technical and Vocational Education and Training) institutions are expanding under Ghana's educational reforms, yet they represent only about 5% of total secondary enrolments (World Bank, 2022). Many institutions lack modern equipment, qualified instructors, and strong industry linkages (ILO, 2020).



The education and training infrastructure in Northern Ghana lags behind national averages in both quality and accessibility. Rural communities face structural deficits, such as long distances to schools, low teacher retention, and insufficient classroom infrastructure (MoE, 2020).

Adult literacy rates in the northern regions are significantly lower than the national average, hovering around 50% for males and below 35% for females in some districts (GSS, 2021). Dropout rates are high at the junior high and senior high school levels, often due to poverty, teenage pregnancy, and early marriage (UNICEF, 2021).

The availability of vocational and technical training centers is limited in the northern belt. Where such institutions exist, they are often poorly equipped and underfunded. Moreover, few Programmes are tailored to the local labour market (e.g., agro-processing, shea butter production, renewable energy) or informal sector needs (World Bank, 2022)

1.22 Social Cohesion and Conflict Dynamics

Ghana has long been regarded as a stable democracy in West Africa. However, beneath this relative stability, there are persistent inequalities and identity-based divisions that challenge social cohesion. Ethnic, political, and religious diversity coexists peacefully in most regions, but tensions do arise often along lines of ethnicity, chieftaincy disputes, access to land, and partisan politics (National Peace Council, 2021).

Trust in public institutions and perceptions of fairness vary across groups, with youth and women expressing greater levels of marginalization in decision-making processes (Afrobarometer, 2022). Economic disparities between the southern and northern regions of Ghana also contribute to a sense of exclusion, particularly among youth who face high unemployment and limited access to opportunities (UNDP, 2021).

Northern Ghana has experienced recurrent community conflicts, mostly driven by chieftaincy succession disputes (e.g., in Dagbon, Bawku, and Mamprugu areas), land ownership and boundary disputes, especially in agrarian communities, farmer-herder conflicts, linked to seasonal migration and competition for natural resources and ethnic tensions and political polarization, particularly during election seasons (CICG, 2020)

These conflicts often escalate into violence, leading to loss of lives, displacement, destruction of property, and long-term trauma. They also disrupt economic activities, education, and local development initiatives, disproportionately affecting women and youth (GSS, 2022).

Women are frequently excluded from peacebuilding and conflict resolution structures, although they bear the brunt of violence and often play critical informal roles in reconciliation. Youth, on

the other hand, are often both victims and participants in violent episodes, making them key stakeholders in any peacebuilding process (WANEP, 2021).



1.23 Description of E&S Risks

This section presents a comprehensive overview of the potential environmental and social (E&S) benefits and risks associated with the implementation of the Programme. It highlights the anticipated positive impacts across key thematic areas including climate resilience, gender equality, youth employment, institutional capacity strengthening, and contribution to the Sustainable Development Goals (SDGs). In addition, it outlines the E&S risks associated with the implementation of the Programme

1.24 Beneficial Impacts

The Programme offers a range of E&S benefits that align with sustainable development principles while addressing Ghana's specific socio-economic and environmental challenges. These benefits cut across key areas such as environmental resilience, social inclusion, gender equity, and institutional capacity strengthening. The benefits of the Programme are categorized under the following broad themes:

- Environmental benefits;
- Social benefits;
- Institutional and systems strengthening; and
- Contribution to sustainable development.

1.24.1 Environmental Benefits

1.24.1.1 Climate Resilience and Environmental Awareness

Through the support for climate-smart skills training, the project introduces sustainable practices in sectors like agriculture and forestry, contributing to environmental sustainability and community resilience to climate change. The training institutions would include environmental safeguards and climate-conscious modules such as geospatial information systems that would promote resource conservation and risk reduction.

1.24.1.2 Early Warning Systems and Climate Risk Management

The renovation of institutions involved in the climate and weather early warning systems would enhance national and local capacity to predict and manage environmental risks, which is vital for farming communities and disaster-prone areas in particular in Northern Ghana.

1.24.2 Social Benefits

1.24.2.1 Inclusive Economic Participation

The Programme targets mainly women and youth. These are two demographic groups historically marginalized within Ghana's formal economy. By offering training, entrepreneurship support, and



access to finance, the Programme enhances their economic empowerment and contributes to reducing inequality. The Programme also places significant emphasis on the informal sector, where approximately 70% of MSMEs operate outside formal structures. Through the promotion of business formalization, beneficiaries will gain improved access to social protection, labour rights, and regulatory support, fostering more sustainable and secure livelihoods.

1.24.2.2 Gender Equality and Empowerment

There is a deliberate target of allocating at least 50% of Programme beneficiaries to women across all major components which demonstrates a strong commitment to gender mainstreaming. This is further reinforced by targeted interventions to prevent GBV, SEA, SH and child marriage, particularly in fragile and underserved areas. These actions contribute to creating safer, more equitable communities while empowering women to become active contributors to social and economic development.

1.24.2.3 Regional Equity and Social Cohesion

By prioritizing interventions in Northern Ghana, where levels of unemployment, poverty, and fragility are highest, the Programme promotes regional equity and inclusivity. Addressing key drivers of conflict such as exclusion, lack of opportunity, and weak local governance, GWYESCO contributes to peacebuilding and conflict prevention. Strengthening traditional governance structures and supporting community-level dialogue mechanisms will help build trust, foster collaboration, and enhance local resilience to social tensions.

1.24.2.4 Youth Employment and Human Capital Development

In response to Ghana's pressing youth unemployment and underemployment challenge which affect nearly 50% of the youth population, the Programme provides practical, industry-relevant vocational training and apprenticeship opportunities. It also supports skills development in STEM, digital innovation, and climate-smart practices, equipping young people for emerging opportunities in the green and digital economies. These efforts will not only improve individual employability but also expand the country's human capital for future economic transformation.

1.24.3 Institutional and System Strengthening

The ESSA process assesses and aims to enhance Implementing Agencies including SIF to manage E&S risks on the Programme by aligning national systems with the Bank's ISS principles. Capacity-building initiatives targeting implementing agencies and relevant stakeholders will strengthen the institutional framework for effective E&S risk management on the Program. Robust monitoring and evaluation (M&E) systems will be established to improve the tracking of E&S performance indicators and ensure compliance national laws and the Bank's ISS. In addition, the Programme's emphasis on public-private partnerships (PPPs) and stakeholder engagement will promote greater transparency, accountability, and inclusiveness in project implementation.



1.24.4 Contribution to Sustainable Development

The Programme significantly contributes to the achievement of multiple SDGs, reinforcing Ghana's commitment to global development priorities. By promoting inclusive growth and targeting marginalized populations, the Programme supports SDG 1 (No Poverty) through improved livelihoods, income-generating opportunities, and social safety nets for vulnerable groups. In line with SDG 5 (Gender Equality), the Programme integrates gender-responsive strategies that empower women and promote their full participation in economic and social development processes. Through skills development, job creation, and entrepreneurship support, the Programme advances SDG 8 (Decent Work and Economic Growth), particularly among youth and underrepresented populations.

Efforts to enhance equitable access to services and opportunities also align with SDG 10 (Reduced Inequalities) by addressing regional, gender, and socio-economic disparities. Environmental sustainability components of the Programme, including climate resilience measures and sustainable resource management, directly support SDG 13 (Climate Action). Lastly, the strengthening of institutional frameworks and accountability mechanisms enhances governance structures and promotes transparency, aligning with SDG 16 (Peace, Justice, and Strong Institutions). Together, these contributions demonstrate the Programme's holistic approach to sustainable development and its alignment with national and global development agendas.

1.25 E&S Risks

The Project is classified as Category 2 in accordance with the Bank's ISS. This classification reflects a low to moderate risk level, with potential concerns including occupational health and safety, air quality deterioration, and waste management. These risks are considered readily reversible and can be effectively mitigated through appropriate management measures and adherence to internationally recognized design criteria and standards. Overall, the Programme is anticipated to generate positive E&S outcomes, particularly through institutional and systems strengthening, as well as its contribution to the achievement of the SDGs. A summary of the key E&S risks associated with the Programme is presented in the Table 1.2 below.

Table 1. 2 *Summary of Environmental and Social Risks by Results Area*



Result Area	Activity Focus	Key Environmental Risks	Key Social Risks
Result Area 1: Skills Development for Employability and Job Creation	<ul style="list-style-type: none"> • Apprenticeship & short-term training • Renovation & equipping of TVET centres • STEM, digital & geospatial skills development 	<ul style="list-style-type: none"> • Poor waste management practices including improper treatment/disposal of renovation waste & e-waste generation • Risks of air and noise pollution from renovation works • Risk of increased demand on utilities such as energy and water use • Risk of improper disposal of training materials/equipment 	<ul style="list-style-type: none"> • Risk of gender discrimination in skill areas • Risk of injuries (incidents and accidents) related to OHS during practical training • Inclusion challenges for women and Northern youth • Risk of potential community conflict/grievances on selection processes for beneficiaries
Result Area 2: Access to Finance, Business Development Services and Market Access	<ul style="list-style-type: none"> • Establishment of financing facility • MSME training & formalization • Market access facilitation 	<ul style="list-style-type: none"> • Increased generation of solid waste (packaging, byproducts) • Unsustainable use of resources (e.g., water, energy) 	<ul style="list-style-type: none"> • Exclusion of vulnerable groups (e.g., due to financial illiteracy) • Social tension over fund access or training slots • Poor labour practices in informal MSMEs • Risk of sexual exploitation from women accessing finance



Result Area	Activity Focus	Key Environmental Risks	Key Social Risks
Result Area 3: Institutional Capacity Building, Conflict Resolution, Gender Based Violence and Support to Policy Implementation	<ul style="list-style-type: none"> Capacity of 5 institutions built for improved service delivery District assemblies and local governance institutions strengthened for conflict resolutions Trainings to prevent Sexual and Gender Based violence and other drivers of fragility 	<ul style="list-style-type: none"> Risk of noise pollution Risk of increased demand on utilities such as energy and water use Risk on environmental sustainability, threat to wildlife and degradation 	<ul style="list-style-type: none"> Reinforcement of existing power imbalances Risk of community backlash if institutions are perceived as biased Inadequate handling of GBV issues Limited inclusion of women, youth, or vulnerable groups in policy discussions

1.26 Estimated Cost of E&S Management

Effective management of environmental and social risks under the Programme requires strategic investment in institutional capacity, monitoring mechanisms, stakeholder engagement, and mitigation actions. Based on the scope of activities and anticipated risks identified in above section, the following cost categories and estimated budgets are proposed (Table 1.3) to ensure robust E&S risk management throughout the Programme implementation:

Table 1.3 *Estimated Cost of E&S Management*

Cost Category	Description	Estimated Cost (USD)
Capacity Building and Training	Training of implementing agency staff, contractors, and stakeholders on ESS principles, GBV/SEA-SH prevention, occupational health and safety (OHS), grievance redress mechanisms (GRM), and gender inclusion.	80,000
Environmental Mitigation Measures	Management of construction/renovation waste, air and noise pollution control, e-waste handling, and sustainable resource use practices at training and institutional sites.	80,000

Social Risk Mitigation	Inclusive beneficiary selection processes, stakeholder engagement, grievance handling, and community sensitization (including gender equity, GBV/SEA-SH risk reduction, and peacebuilding).	80,000
Monitoring and Evaluation (E&S)	Regular E&S audits, field supervision, development and use of E&S performance indicators, and third-party monitoring.	70,000
Development of Guidelines and Tools	Preparation of E&S screening checklists, safeguard protocols for MSMEs, sector-specific E&S guidance notes, and digital reporting tools.	50,000
Contingency and Incident Response	Emergency response funds for unforeseen E&S incidents (e.g., environmental spills, safety accidents, or GBV/SEA-SH cases).	50,000
Total		410,000



SECTION 2: ASSESSMENT OF THE ENVIRONMENTAL AND SOCIAL SYSTEM OF THE PROGRAM



2.0 DESCRIPTION OF RELEVANT POLICY, LEGAL AND REGULATORY FRAMEWORK

The Ghanaian Constitution 1992 sets the tone for environmental and social protection, labour working conditions and gender equality by stating the following:

- Section 36(9): “the State shall take appropriate measures needed to protect and safeguard the national environment for posterity; and shall seek co-operation with other states and bodies for purposes of protecting the wider international environment for mankind.”
- Section 41 (k) “to protect and safeguard the environment.”
- Section 36(10): The State shall safeguard the health, safety and welfare of all persons in employment, and shall establish the basis for the full deployment of the creative potential of all Ghanaians

This chapter discusses National environmental policy and related requirements, Employment and skills development sector policies, National labour, gender and human requirements, National health and safety requirements, National environmental quality standards, International Requirements and Conventions. It further discusses institutions relevant to the GWYESCO Project. It also discusses the Bank’s ISS and concludes with a Comparison between the Ghana E&S Regulations and the AfDB ISS.

2.1 The Constitution, National Environmental Policy and Related Requirements

The policies, regulatory and other requirements include:

- The Constitution of Ghana, 1992;
- National Environmental Policy, 2013;
- Environmental Sanitation Policy, 2010;
- Environmental Protection Act, 2025 (Act 1124);
- Environmental Assessment Regulations, 1999 (L.I 1652);
- National Climate Change Policy, 2013; and
- Hazardous and Electronic Waste Control and Management Act, 2016 (Act 917).

Table 2.1 The Constitution, National Environmental Policy and Requirements



Policy/Legislation/Strategy	Relevance
<p><i>The Constitution of Ghana, 1992</i></p> <p>The 1992 Constitution is the supreme law of Ghana. It lays the legal foundation for environmental and social protection in Ghana through the following Sections</p> <ul style="list-style-type: none"> • Section 36(9): “the State shall take appropriate measures needed to protect and safeguard the national environment for posterity; and shall seek co-operation with other states and bodies for purposes of protecting the wider international environment for mankind.” • Section 41 (k) “to protect and safeguard the environment.” 	<p>This constitutional mandate provides a foundation for Programmes like GWYESCO to ensure environmentally sustainable development.</p>
<p><i>National Environmental Policy, 2013</i></p> <p>The policy is devised for a holistic management of the environment, where people have access to clean air and water, decent housing, and other necessities of life and to sustain society at large.</p>	<p>The GWYESCO project poses E&S risks such as deterioration in air quality, noise pollution, poor waste management which could affect water quality, etc.</p>
<p><i>Environmental Sanitation Policy, 2010</i></p> <p>The policy provides a comprehensive framework for improving hygiene, public health, and environmental quality through effective sanitation services. It emphasizes the safe collection, treatment, and disposal of human waste, solid and liquid waste, and stormwater.</p>	<p>The GWYESCO project is expected to generate waste such as renovation and demolition waste during renovation works and subsequently general waste during operations.</p>
<p><i>Environmental Protection Act, 2025 (Act 1124)</i></p> <p>The Act mandates the EPA to ensure compliance with the laid down EIA procedures in the planning and execution of development projects, among others.</p>	<p>The implementation of project activities consistent with provisions of the ESSA will therefore ensure compliance with the EA Regulations.</p>
<p><i>Environmental Assessment Regulations, 1999 (L.I 1652)</i></p> <p>The Regulations prohibit commencing an “undertaking” without prior registration and obtaining an environmental permit. Undertakings/activities are grouped into Schedules 1 (those requiring registration) and 2 (those requiring environmental permit and EIA mandatory undertakings)</p>	<p>Per the LI I652, projects such as the GWYESCO must be duly registered with the EPA and follow the EIA requirements to obtain environmental permits when due for implementation.</p>



<p><i>National Climate Change Policy, 2013</i></p> <p>The policy affirms Ghana’s resolve to lessen the potential hardships that climate change impacts may pose to sustainable development.</p>	<p>Renovation of the Programme infrastructure such as the TVET centers must be responsive to enhancing climate resilience through the provision of adequate drainage systems and waste management measures to prevent clogging of drains and worsening flood conditions.</p>
<p><i>Hazardous and Electronic Waste Control and Management Act, 2016 (Act 917)</i></p> <p>The Act 917 provides for the control, management and disposal of hazardous, electrical, and electronic waste and related purposes.</p>	<p>The Act regulates handling and disposal of hazardous and e-waste which is important for safe management of obsolete equipment during the renovation of the TVET centers.</p>

2.3 The Constitution, Employment and Skills Development Sector Policies

The relevant policies, regulatory and other requirements include:

- The Constitution of Ghana, 1992;
- National Employment Policy, 2014;
- Youth Employment Agency Act, 2015 (Act 887);
- Ghana Enterprises Agency Act, 2020 (Act 1043);
- National Apprenticeship Policy, 2020;
- Ghana’s Medium-Term National Development Policy Framework (MTNDPF) 2022–2025; and
- Coordinated Programme of Economic and Social Development Policies (2021–2025).

Table 2. 2 The Constitution, Employment and Skills Development Sector Policies

Policy/Legislation/Strategy	Relevance
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<p><i>The Constitution of Ghana, 1992</i></p> <p>The 1992 Constitution is the supreme law of Ghana. It lays the legal foundation for governance, human rights, and national development. Article 36 (1) and (2) of the constitution mandates the state to take steps for economic development, job creation, and the promotion of private enterprise. Article 36 (6) requires the state to ensure equal economic opportunities to all citizens and integration of women in the mainstream of economic development in Ghana.</p>	<p>The Programme objectives which include the enhancement of job creation and promotion of economic inclusion, align with the legal requirements of the Constitution.</p>
<p><i>National Employment Policy, 2014</i></p> <p>The policy provides a strategic framework for promoting productive and decent employment for all Ghanaians, especially youth, women, and vulnerable groups. It emphasises job creation, employability, entrepreneurship, labour market governance, and improved coordination of employment Programmes.</p>	<p>The Programme seeks to enhance the resilience and living conditions of Ghanaian women and youth by promoting economic inclusion and social cohesion through job creation, entrepreneurship and skills development. Hence, the relevance of this Act</p>
<p><i>Youth Employment Agency Act, 2015 (Act 887)</i></p> <p>The Act establishes the Youth Employment Agency (YEA) as a statutory body to coordinate and manage youth employment initiatives in Ghana. It consolidates previous youth employment Programmes under one legal framework and empowers the YEA to develop and implement employment modules, collaborate with public and private sectors, support entrepreneurship and skills training, mobilize resources through a dedicated employment fund, and ensure equitable job access across all regions.</p>	<p>The Act underpins national efforts to address youth unemployment, which is a primary focus of the GWYESCO project. Hence, the relevance of this Act.</p>
<p><i>National Youth Policy, 2022-2032</i></p> <p>The policy provides a framework and direction for all stakeholders involved in the implementation of policies, Programmes and projects for the development of the youth. It is also a tool for effective and efficient coordination and utilisation of resources for the optimum benefit of the youth and their contribution to national development.</p>	<p>GWYESCO Programme aims at promoting decent job creation, employability and livelihood empowerment for the youth. This policy is thus relevant to the Project as it sets a framework for the development of youths through Programmes and projects</p>



<p><i>Ghana Enterprises Agency Act, 2020 (Act 1043)</i></p> <p>The Act establishes the Ghana Enterprises Agency to promote and develop MSMEs in Ghana and provide for related matters. The Act mandates the Agency to promote and develop MSMEs, oversee and coordinate the development, strengthen the capacity and maximise the contribution of MSMEs to the economic and social development of the country.</p>	<p>The Act empowers GEA to facilitate financial access, which is crucial for GWYESCO's objective to support business startups and scaling, thereby enhancing the growth of women and youth-led MSMEs.</p>
<p><i>National Apprenticeship Policy, 2020</i></p> <p>The policy sets out the mechanisms required to strengthen the National Apprenticeship System in Ghana and help improve opportunities for youth employment. This apprenticeship policy also aims to deliver a well-coordinated, inter-sectoral national apprenticeship system enabling all categories of learners to acquire relevant skills for employment, livelihoods empowerment and socio-economic development.</p>	<p>The policy encourages the reinforcement of youth-led enterprises through certified training in line with the GWYESCO Programme objectives.</p>
<p><i>Ghana's Medium-Term National Development Policy Framework (MTNDPF) 2022–2025</i></p> <p>The framework focuses on achieving the Sustainable Development Goals (SDGs) and Ghana's long-term vision of becoming an inclusive, resilient, and prosperous country.</p>	<p>The policy is organised around six policy objectives, including building a resilient economy, expanding access to jobs, and ensuring environmental sustainability, which directly aligns with GWYESCO's pillars of employment generation, skills development, and institutional strengthening.</p>
<p><i>Coordinated Programme of Economic and Social Development Policies (2021–2025)</i></p> <p>This serves as the government's overarching policy direction mandated by Article 36 (5) of the 1992 Constitution. It outlines Ghana's strategic development vision to transform the economy through inclusive growth, job creation, digitalisation, infrastructure development, and improved governance.</p>	<p>The policy advocates for skills development, particularly in TVET and digital technologies which are part of the focus of the GWYESCO Programme.</p>

2.4 The Constitution, National Labour, Gender and Human Requirements

The requirements and provisions for workers, gender and social protection include:



- The Constitution of Ghana, 1992;
- Labour Act, 2003 (Act 651);
- National Gender Policy, 2015;
- Affirmative Action (Gender Equality) Act, 2024; and
- Persons with Disability Act, 2006 (Act 715).

Table 2. 3 The Constitution, National Labour, Gender and Human Requirements

Policy/Legislation/Strategy	Relevance
<p>The 1992 Constitution is the supreme law of Ghana. It lays the legal foundation for addressing human vulnerability as well as gender related issues through</p> <ul style="list-style-type: none"> • Section 17(1): “All persons shall be equal before the law.” • Section 17 (2): “A person shall not be discriminated against on grounds of gender, race, colour, ethnic origin, religion, creed or social or economic status.” • Section 37 2(b) the protection and promotion of all other basic human rights and freedoms, including the rights of the disabled, the aged, children and other vulnerable groups in development processes. 	<p>This constitutional framework underpins Programmes like GWYESCO to ensure inclusive and equitable opportunities for all.</p>
<p>Labour Act, 2003 (Act 651)</p> <p>The purpose of the Labour Act, 2003 (Act 651) is to amend and consolidate existing laws relating to labour, employers, trade unions and industrial relations. The Act provides for the fair treatment of labours to prevent discrimination of any sort, and the provision of special incentives to an employer who employs persons with disability.</p>	<p>The provisions under Part XV (Occupational Health, Safety and Environment) of the Act explicitly prescribe the duty of an employer to ensure that every worker works under satisfactory, safe and healthy conditions during the renovation activities of the Programme.</p>
<p>National Gender Policy, 2015</p> <p>The National Gender Policy provides a comprehensive framework to promote gender equality and equity as a foundation for sustainable national development. It goes beyond focusing solely on women and explicitly includes the rights, roles, and responsibilities of men and persons with disabilities (PWDs) in fostering inclusive growth and social cohesion.</p>	<p>The policy supports GWYESCO’s objective to empower all vulnerable groups, including women, youth, PWDs, and men, through equitable access to jobs, training, and entrepreneurship support.</p>



<p><i>Affirmative Action (Gender Equality) Act, 2024</i></p> <p>The objective of this Act is to ensure the achievement of gender equality in the political, social, economic, educational and cultural spheres of society. The Act sets progressive targets for women's representation in various employment sectors, including public service, security services, judiciary, parliament and private sector, ultimately achieving 50% women's representation by 2028. Section 24 requires private employers to have a gender equality policy in furtherance of the set targets, to be reviewed periodically (at least every four years).</p>	<p>The Programme objectives focus on gender equality, which is in line with the provisions in the Act.</p>
<p><i>Persons with Disability Act, 2006 (Act 715)</i></p> <p>The Persons with Disability Act, 2006 (Act 715) provides certain rights to protect persons with disabilities (PWD) with incentives for their engagement in business and to business organisations that employ PWDs. It also prohibits discrimination against persons with disabilities in employment, education, and public services.</p>	<p>The Act offers guidance to the GWYESCO Programme to ensure accessibility and inclusion of persons with disabilities in job creation and training Programmes.</p>

2.5 The Constitution, National Health and Safety Requirements

The relevant policies that ensure the general well-being, health promotion and safety of workers and the public include:

- The Constitution of Ghana, 1992;
- National Health Policy, 2020;
- Public Health Act, 2012 (Act 851);
- Workmen's Compensation Act, 1987 (PNDCL 187);
- Factories, Offices and Shops Act, 1970 (Act 328);
- Ghana National Fire Service Act, 1997 (Act 537)
- National Workplace HIV/AIDS Policy, 2012;
- National HIV and AIDS Policy, 2019;
- Ghana's National Strategy for Preventing and Countering Violent Extremism, 2019; and
- National Peace Council Act, 2011 (Act 818).

Table 2. 4 The Constitution, National Health and Safety Requirements



Policy/Legislation/Strategy	Relevance
<p><i>The Constitution of Ghana, 1992</i></p> <p>The 1992 Constitution is the supreme law of Ghana. It lays the legal foundation for health and safety in the country through the following section 36(10): The State shall safeguard the health, safety and welfare of all persons in employment, and shall establish the basis for the full deployment of the creative potential of all Ghanaians.</p>	<p>The 1992 Constitution of Ghana ensures the State protects the health and safety of all persons in employment, providing a legal basis for GWYESCO to promote safe and fair working conditions for project workers and beneficiaries.</p>
<p><i>National Health Policy, 2020</i></p> <p>The National Health Policy, 2020 works towards the achievement of healthy lives with the goal to promote, restore and maintain good health for all people living in Ghana.</p>	<p>Provisions for prevention and protection of occupational and public health and safety have been made in the ESSA, following analysis of the extent of risks posed during Programme activities</p>
<p><i>Public Health Act, 2012 (Act 851)</i></p> <p>The Public Health Act, 2012 (851) of Ghana was passed to prevent disease, promote, safeguard, maintain and protect the health of humans and animals and provide for related matters. The Act has various groupings, including communicable diseases, environmental sanitation, etc.</p>	
<p><i>Workmen's Compensation Act, 1987 (PNDCL 187)</i></p> <p>The Act holds employers responsible for the payment of compensation to workmen for personal injuries caused by accidents arising out and in the course of their employment; and employee not to suffer a diminution in earnings while undergoing treatment for the injuries sustained. Contractors and employers are responsible for the safety of employees.</p>	<p>In cases of injuries arising out of, and in the course of employment, provisions for the workers' compensation had been provided in accordance with the Act, in the ESSA.</p>
<p><i>Factories, Offices and Shop Act, 1970 (Act 328)</i></p> <p>The Act spells out the responsibilities of an employer in ensuring a safe and healthy work environment and placing the mandate under the Department of Factories Inspectorate to register such activities. It defines a factory to include any premises (whether in or not in a building) in which one or more persons are employed in manual labour in any process.</p>	<p>Measures to ensure a safe and healthy working environment as well as the safety and wellbeing of workers have been provided in accordance with Act 328.</p>



<p><i>Ghana National Fire Service Act, 1997 (Act 537)</i></p> <p>The Act re-establishes the Fire Service to provide for the management of undesired fires, technical advice for building plans and structural layouts to facilitate escape from fire, and rescue operations and fire management.</p>	
<p><i>Fire Precaution (Premises) Regulations, 2003 (LI 1724)</i></p> <p>The Regulations require a fire certificate for premises used as a public place or place of work. It is incumbent on any project developer to ensure that adequate provision and measures are introduced to minimize or prevent fire outbreaks.</p>	<p>Mitigation actions to minimise or prevent fire outbreaks at the TVET centers and its spread to the immediate neighbours in line with the Act 537 and LI 1724 have been provided in this ESSA.</p>
<p><i>National Workplace HIV/AIDS Policy, 2012</i></p> <p>The broad objectives of this policy, among others, are to provide protection from stigmatization and discrimination in the workplace to people living with HIV and AIDS; prevent HIV and AIDS spread among workers; and provide care, support, and counselling for those infected and affected.</p>	
<p><i>National HIV and AIDS Policy, 2019</i></p> <p>The policy aims at creating an enabling environment for the development and execution of effective and efficient HIV and AIDS interventions and for the achievement of epidemic control.</p>	<p>To prevent workplace discrimination against persons with HIV, measures such as workplace HIV policy implementation have been provided in line with the National Workplace HIV/AIDS and National HIV/AIDS policies.</p>
<p><i>Ghana's National Strategy for Preventing and Countering Violent Extremism, 2019</i></p> <p>The Policy aims to address the root causes of violent extremism, including conflict and instability. It recognises marginalisation, unemployment, poverty, and lack of opportunities, especially among youth and women, as drivers of radicalisation.</p>	<p>The GWYESCO Programme objectives directly tackle these issues by promoting job creation, skills development, and entrepreneurship, especially in targeted areas like the Northern Region of Ghana</p>
<p><i>National Peace Council Act, 2011 (Act 818)</i></p> <p>The Act establishes the National Peace Council (NPC) as an independent statutory body that promotes peace and prevents conflict in Ghana. The Act provides the legal and institutional framework for managing conflict and building sustainable peace at the national, regional, and district levels.</p>	<p>The Programme seeks to promote social cohesion in accordance with Act 818.</p>



2.6 National Environmental Quality Standards

The Ghana Standards Authority is the national statutory body responsible for the development and promulgation of Ghana Standards. The relevant environmental quality national standards include:

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

2.6.1 Ghana Standard on Health Protection - Requirements for Ambient Noise Controls (GS 1222:2018)

The GS 1222:2018 provides technical requirements for managing and controlling ambient (environmental) noise in Ghana. It sets maximum permissible noise levels for various land-use zones (Table 2.5) and aims to protect public health and environmental quality by minimizing harmful noise exposure.

Table 2.5 Limits for Ambient Noise Control

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

2.6.2 Ghana Standard on Environment and Health Protection - Requirements for Ambient Air Quality and Point Source/Stack Emissions (GS 1236:2019)

The GS 1236:2019 provides the regulatory framework for monitoring and controlling air quality and emissions from fixed (point) sources such as industrial stacks. It is designed to protect public

health, ecosystems, and environmental quality by setting limits on ambient air pollutants and emissions (Table 2.6).



Table 2. 6 *Limits for Ambient Air Quality – Maximum Limit for 24 Hours*

Substance	Maximum Limit (µg/m ³)
Sulphur Dioxide (SO ₂)	50
Nitrogen Oxide (NO ₂)	150
Total suspended particulate matter	150
PM ₁₀	70
PM _{2.5}	35
Black Carbon	25
Lead	1

Relevant measures have been provided in the ESSA to ensure that all Programme infrastructure renovation works comply with the GS 1222:2018 and GS 1236:2019.

2.7 AfDB Integrated Safeguards System

The AfDB's Integrated Safeguards System (ISS) ensures that operations are environmentally and socially sustainable. The Programme complies with AfDB's ISS, which includes the Operational Safeguards (OSs) as indicated in Table 5.7

Table 2. 7 *Summary of Operational Safeguards*

Operational Safeguard (OS)	Description and Applicability
OS 1: Assessment and Management of Environmental and Social Risks and Impacts	<p>OS 1 sets out the Borrower's responsibilities for assessing, managing, and monitoring E&S Risks and impacts associated with each stage of an operation/project supported by the Bank Group</p> <p>The ESSA is to assess the Borrower's E&S system using equivalence and acceptability in accordance with OS 1.</p>



<p>OS 2: Labour and Working Conditions</p>	<p>OS 2 recognises the importance of fair treatment, safe working conditions, and avoidance of harmful practices, including forced labour and promoting workers' rights and well-being.</p> <p>The objectives of OS2 are to (i) protect workers' rights; (ii) promote safety and health in the workplace; (iii) promote the fair treatment, non-discrimination, and equal opportunity of project workers; (iv) protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this OS) and migrant workers, contracted workers, community workers, and primary supply workers, as appropriate; and (v) prevent the use of all forms of forced labour and child labour.</p> <p>The scope of application of OS2 depends on the type of employment relationships between the Borrower and the project workers. The term project worker refers to: (i) people employed or engaged directly by the Borrower, including the proponent(s) of project/activities and the implementing agencies that carry out projects, activities or other initiatives, to work specifically on the project (direct workers); (ii) people employed or engaged through third parties to perform work related to the core functions of the project, regardless of location (contracted workers); (iii) people employed or engaged by the Borrower's primary suppliers (primary supply workers); (iv) people employed or engaged in providing community labour (community workers).</p> <p>The Programme will present occupational health and safety risks, especially as various types of workers would be engaged on the Project and therefore the Project should meet the requirements of OS2.</p>
<p>OS 3: Resources Efficiency and Pollution Prevention and Management</p>	<p>OS3 sets out the requirements to address resource efficiency and pollution prevention and management throughout the project life cycle in a manner consistent with Good International Industry Practice.</p> <p>The objectives of OS3 are to: (i) promote the sustainable use of resources, including energy, water, and raw materials; (ii) avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing pollution from project activities; (iii) avoid or minimize project-related emissions of short and long-lived climate pollutants; (iv) avoid or minimize generation of hazardous and non-hazardous waste; and (v) minimize and manage the risks and impacts associated with pesticide use.</p> <p>The Programme involves the renovation of existing facilities such as training centers, which may produce construction waste, dust, noise, and emissions, and involve energy and water use. Measures have been provided in the ESSA to manage waste and conserve energy and water as required by OS 3.</p>



<p>OS 4: Community Health, Safety and Security</p>	<p>OS4 addresses the health, safety, and security risks and impacts on project-affected communities and the corresponding responsibility of the Borrower to avoid or minimise such risks and impacts, with particular attention to people who, because of their circumstances, may be vulnerable.</p> <p>The objectives of OS4 are to: (i) anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project or operation lifecycle from both routine and non-routine circumstances; (ii) help promote public health and safety across the project's area of influence by, inter alia, promoting and supporting Programmes that aim at preventing the spread of major communicable diseases; (iii) To promote quality and safety, and considerations relating to climate change in the design and construction of infrastructure, including dams; (iv) To avoid or minimize community exposure to project-related traffic and road safety risks, diseases, and hazardous materials; (v) To ensure that effective measures to address emergency events are in place; (vi) To ensure that the safeguarding of personnel and property through the provision of public or private security is carried out in a manner that avoids or minimizes risks to the project-affected communities and in a manner consistent with international human rights standards and principles; and (vii) To help prevent against sexual exploitation, abuse and sexual harassment (SEAH) of members of the community by project workers.</p> <p>The implementation of the Programme could increase community/public exposure to risks and impacts such as noise, dust and emissions, etc. The ESSA prioritised safeguarding of the public by providing measures to prevent any impacts and risks arising from the Programme activities in line with OS 4.</p>
<p>OS 5: Land Acquisition, Restrictions on Access to Land and Land Use, and Involuntary Resettlement</p>	<p>OS 5 encourages Borrowers to avoid any project activities that result in the involuntary resettlement of people. Where involuntary resettlement is unavoidable, the Borrower is required to conduct a meaningful analysis of possible alternatives, which centralizes the multiple social, economic, physical, environmental and cultural costs associated with involuntary resettlement, and factors these costs into decision-making on project siting, routing, design, etc., to mitigate adverse impacts on displaced people.</p> <p>Renovation works, capacity building sessions, and ICT equipping would take place on existing infrastructure and thus no land is anticipated to be acquired on this Programme.</p>



<p>OS 6: Habitat and Biodiversity Conservation and Sustainable Management of Living Natural Resources</p>	<p>OS6 recognises that protecting and conserving biodiversity and sustainably managing living natural resources are fundamental to sustainable development. It addresses sustainable management of primary production and harvesting of living natural resources and recognises the need to consider the livelihood of project-affected parties, including vulnerable groups whose access to, or use of, biodiversity or living natural resources may be affected by a project.</p> <p>The objectives of OS6 are to (i) protect and conserve biodiversity and different types of habitats; (ii) apply the mitigation hierarchy and the precautionary approach in the design and implementation of projects that could have an impact on biodiversity, with the aim of conserving biological diversity and ecosystem integrity; (iii) reinstate or restore biodiversity informed by the mitigation hierarchy, including where some impacts are unavoidable, through implementing biodiversity offsets to achieve “no net loss but net gain” of biodiversity; (iv) promote the sustainable management of living natural resources; (v) support livelihoods of local communities, including vulnerable groups, and inclusive economic development through the adoption of practices that integrate conservation needs and development priorities; (vi) sustain the availability and productivity of ecosystem services to maintain benefits for the affected communities and sustain project performance; (vii) integrate natural resources effectively into sustainable economic development and protect the vital local and global environmental services and the values of natural resources.</p> <p>The Programme focuses on skills training, entrepreneurship, and support for MSMEs in urban and peri-urban areas. At this stage, there are no indication of involving activities in biodiversity-sensitive areas or reliance on natural resources for livelihood. Hence, it is not expected to cause any direct or indirect harm to natural habitats or ecosystems.</p>
<p>OS 7: Vulnerable Groups</p>	<p>OS7 contributes to poverty reduction and sustainable development by ensuring that projects supported by the Bank enhance opportunities for vulnerable groups to participate in, and benefit from, the development process in ways that do not threaten their unique cultural identities and well-being. These vulnerable groups may include female-headed households, the landless, the elderly, youth and children, PWDs, groups who are marginalised based on ethnicity, religion, language, as well as sexual orientation and gender identity, among others.</p> <p>Within the context of the Bank’s operations, individuals and/or groups who are at a higher risk of being unable to anticipate, cope with, resist, and recover from project-related risks and/or adverse impacts are considered vulnerable.</p> <p>The core focus of the GWYESCO Programme is to economically empower women and youth, many of whom belong to vulnerable and marginalised groups which is in line with OS 7.</p>



<p>OS 8: Cultural Heritage</p>	<p>OS 8 recognises that cultural heritage provides continuity in tangible and intangible forms between the past, present and future. It sets out measures designed to protect cultural heritage throughout the project life cycle.</p> <p>The objectives of OS8 are to (i) protect cultural heritage from the adverse impacts of project activities and support its preservation; (ii) address cultural heritage as an integral aspect of sustainable development; (iii) promote meaningful consultation with stakeholders regarding cultural heritage as a means to identify and address risks and impacts related to cultural heritage; (iv) promote the equitable sharing of benefits from the use of cultural heritage with affected stakeholders.</p> <p>There is a chance of encountering cultural heritage issues in the project areas since Ghana is a country with a rich culture.</p>
<p>OS 9: Financial Intermediaries (FIs)</p>	<p>OS 9 focuses and addresses the requirements associated with intermediated financing through financial and non-financial institutions. Financing partners are required to identify, assess, monitor and manage the E&S risks and impacts associated with their overall portfolios and individual subjects.</p> <p>The objectives of OS9 are to (i) set out how the FI will assess and manage E&S risks and impacts associated with the subprojects that it finances; (ii) promote good E&S management practices in the subprojects that the FI finances; (iii) promote good environmental and sound human resources management within the FI; (iv) support the adoption of best practice standards in corporate governance, business management, and corporate responsibility by enterprises supported by the Bank based upon the requirements of OS1 to OS10, as appropriate; and (v) encourage the consideration of E&S governance issues in capital market institutions such as development finance entities and stock exchanges.</p> <p>The AfDB will disburse funds to ARB Apex Bank to support small businesses through rural and community banks under the GWYESCO Programme. In line with AfDB's OS 9, ARB Apex Bank is required to develop and implement an Environmental and Social Management System (ESMS).</p>



OS 10: Stakeholder Engagement and Information Disclosure	<p>OS 10 recognises the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice.</p> <p>The objectives of OS10 are to (i) establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship and channels of communication with them, in particular project-affected parties; (ii) To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be considered in project design and E&S performance; (iii) promote and provide the means for safe, effective, and inclusive engagement with project affected parties, inclusive of women's perspectives, in an equitable manner, and vulnerable groups, in a manner free of reprisal, throughout the project life cycle on issues that could potentially affect them; (iv) enhance project benefits and mitigate harm to local communities; (v) To ensure that appropriate project information on E&S risks and impacts is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner and format; (vi) To provide project-affected parties with accessible and inclusive means to provide input, raise issues, questions, proposals, concerns, and grievances, and allow Borrowers to respond to and manage such grievances; and (vii) To promote development benefits and opportunities for project-affected communities.</p> <p>The Programme involves many stakeholders with various interests, which ought to be managed using a Stakeholder Engagement Plan.</p>
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2.8 International Requirements and Conventions

The international requirements and conventions to which Ghana is a signatory, relevant to this ESSA are presented in Table 2.8

Table 2.8 Relevant International Conventions

Convention	Main Characteristics	Participation of Ghana
Labour Rights		



International Labour Organization Conventions (ILO)	<p><i>Forced Labour Convention, 1930 (No. 29)</i> The Convention advocates for the suppression of all forms of forced labour. This means that States ratified to this convention must not only criminalize and prosecute forced labour, but also to take effective measures to prevent forced labour and provide victims with protection and access to remedies, including compensation.</p> <p><i>Equal Remuneration Convention, 1951 (No. 100)</i> The Convention focuses on gender discrimination in employment and lays out the principles for equal remuneration for work of equal value and addresses gender discrimination.</p> <p><i>Discrimination (Employment and Occupation) Convention, 1958 (No. 111)</i> The Convention aims to eliminate all forms of discrimination in employment and occupation based on race, colour, sex, religion, political opinion, national extraction, or social origin. It promotes equality of opportunity and treatment by requiring member states to adopt policies, laws, and practices that ensure fair access to employment, training, and working conditions.</p> <p><i>Working Environment (Air Pollution, Noise and Vibration) Convention, 1977 (No. 148)</i> The Convention seeks to protect workers from health risks arising from exposure to harmful levels of air pollution, noise, and vibration in the workplace. It requires member states to establish regulations and standards to assess, prevent, and control these hazards, promote occupational health and safety, and provide adequate training and information to workers.</p>	R=20 th 1957 May
		R=14 th 1968 March
		R=4 th 1961 April
		R=27 th 1986 May
Human Rights		
Convention on the Elimination of All Forms of Discrimination against Women (CEDAW, 1979)	The Convention defines the term "discrimination against women" as any distinction, exclusion or restriction made based on sex which has the effect or purpose of impairing or nullifying the recognition, enjoyment or exercise by women, irrespective of their marital status, on a basis of equality of men and women, of human rights and fundamental freedoms in the political, economic, social, cultural, civil or any other field.	S = 17 th July 1980 R = January 2nd, 1986



Convention on the Rights of Persons with Disabilities (CRPD, 2006)	Article 27 (1) of the Convention recognizes the right of persons with disabilities to work on an equal basis with others; this includes the right to the opportunity to gain a living by work freely chosen or accepted in a labour market and work environment that is open, inclusive and accessible to persons with disabilities.	R=31 st July 2012
Climate Change		
UN Framework Convention on Climate Change (Rio, June 1992)	To stabilize the concentration of greenhouse gases in the atmosphere at a level that should prevent dangerous anthropogenic interference with the climate system. This level should be reached in sufficient time for ecosystems to adapt naturally to climate change, food production would not be threatened, and economic development could continue in a sustainable.	S = 12 th June 1995
Signature = S; Ratification = R		

2.9 Comparison of Ghana EA Regulations and the AfDB Integrated Safeguard System



There are significant gaps between the AfDB ISS requirements and that of Ghana's E&S Regulations. This section presents the comparison between the core requirements of the relevant ISS Operational Safeguards (OSSs) and the Ghana laws, policies and legislative instruments as it relates to the GWYESCO Project. This is presented in Table 2.9 below and also provides measures to bridge identified gaps.

Table 2.9 *Comparison between the ISS and Ghana E&S Regulations*

AfDB Operational Safeguards	Summary of Core Requirements	Ghana Laws, Policies and Legislative Instruments	Gaps Identified in Ghana System	Measures to Bridge Gaps
OS 1: Assessment and Management of E&S Risks and Impacts	OS 1 sets out the Bank and the Borrower's responsibilities for assessing, managing, and monitoring E&S risks and impacts associated with each stage of an operation/project supported by the Bank Group	The Environmental Protection Act, 2025 (Act 1124) and Environmental Assessment Regulations, 1999 (LI 1652). These require assessment of all projects with potential environmental and social impacts	The L.I does not specifically mention social issues such as SEA/SH, persons with disability, etc. and a responsive grievance redress mechanism for project-affected parties within project communities.	Clear guidelines should be provided for sexual exploitation and abuse and sexual harassment (SEA/SH), vulnerability, people with disability, inclusiveness, the need for timely and effective consultation, timely and responsive grievance redress mechanism and adequate consideration of project-affected persons and communities in stakeholder engagement

AfDB Operational Safeguards	Summary of Core Requirements	Ghana Laws, Policies and Legislative Instruments	Gaps Identified in Ghana System	Measures to Bridge Gaps
OS 2: Labour and Working Conditions	OS 2 recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. Also, underscores how borrowers can promote sound worker management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions. The safeguard prohibits forced labour.	Labour Act, 2003 (Act 651): Part XV, Section 118 (1) and (2a-h) of the Act requires employers to ensure that every worker employed by him or her works under satisfactory, safe and healthy conditions, and is further obliged to provide necessary information, instructions, training and supervision to ensure the health and safety of workers as well as in compliance with other Acts such as the Workmen Compensation Act, 1987 (PNDCL 187); Factories, Offices and Shops Act 1970, (Act 328)	Weak enforcement of labour standards, inadequate OHS monitoring	There is a need to strengthen workers organization to ensure that grievance redress mechanisms are set up. More focus should be given to industry standards for occupational health and safety of workers, as well as issues of forced labour.
OS 3: Resource Efficiency and Pollution Prevention and Management	OS3 sets out the requirements to address resource efficiency and pollution prevention and management throughout the project life cycle in a manner consistent with Good International Industry Practice (GIIP).	The Environmental Protection Act, 2025 (Act 1124), Part I includes environmental permits, pollution abatement notices, and the prescription of standards and guidelines. Part II sets out provisions for enforcement and control.	The regulation addresses measures to control, handle and dispose of waste and also measures to deal with pollution. However, effective implementation and	Monitoring and effective implementation of the Act should be improved by the EPA and other sector regulatory bodies.

AfDB Operational Safeguards	Summary of Core Requirements	Ghana Laws, Policies and Legislative Instruments	Gaps Identified in Ghana System	Measures to Bridge Gaps
			enforcement is a challenge.	
OS 4: Community Health and Safety and Security	OS4 addresses the health, safety, and security risks and impacts on project-affected communities and the corresponding responsibility of the Borrower to avoid or minimize such risks and impacts, with particular attention to people who, because of their circumstances, may be vulnerable.	The Environmental Protection Agency Act, 2025 (Act 1124) and Environmental Assessment Regulations, 1999 (LI 1652) require that the public/community members are consulted during project development and implementation to ensure proposed mitigation measures are put in place to safeguard public health. The Labour Act, 2003 (Act 651) also ensures that satisfactory, safe and healthy conditions that ensure the health and safety of workers are provided.	Limited GBV/SEA/SH risk assessment and response frameworks.	Incorporate GBV risk mitigation plans, emergency preparedness, and health impact assessments in projects.

AfDB Operational Safeguards	Summary of Core Requirements	Ghana Laws, Policies and Legislative Instruments	Gaps Identified in Ghana System	Measures to Bridge Gaps
OS 5: Land Acquisition, Restrictions on Access to Land and Land Use, and Involuntary Resettlement	OS 5 encourages Borrowers to avoid any project activities that result in the involuntary resettlement of people. Where involuntary resettlement is unavoidable, the Borrower is required to conduct a meaningful analysis of possible alternatives, which centralizes the multiple social, economic, physical, environmental and cultural costs associated with involuntary resettlement, and factors these costs into decision-making on project siting, routing, design, etc., to mitigate adverse impacts on displaced people.	The Lands Act, 2020 (Act 1036) makes it a necessity for reasons for justification to be provided for causing any hardship to persons who have an interest in or right over the property, and with prompt payment of fair and adequate compensation. Section 265 of the Act requires that a land acquisition and resettlement plan is to be prepared, which is also in compliance with the Lands Commission Act, 2008 (Act 767), The Lands (Statutory Wayleaves) Act, 1963 (Act 186), and the National Land Policy, 1999.	Resettlement assistance is not recognized for those without legal rights to land. Also, there are no legislative provisions that specify the timing of completion of resettlement and compensation. The laws also do not specify support for livelihood restoration and assistance to vulnerable groups	Clear guidelines should be provided for timing of compensation payment, calculation of compensation and valuation, livelihood restoration and assistance, vulnerable groups, squatters (informal settlers), information disclosure, and the use of resettlement instruments such as Resettlement Policy Framework (RPF), Resettlement Action Plan (RAP), and Abbreviated Resettlement Action Plan (ARAP)

AfDB Operational Safeguards	Summary of Core Requirements	Ghana Laws, Policies and Legislative Instruments	Gaps Identified in Ghana System	Measures to Bridge Gaps
OS 6: Habitat and Biodiversity Conservation and Sustainable Management of Living Natural Resources	OS6 recognises that protecting and conserving biodiversity and sustainably managing living natural resources are fundamental to sustainable development. It addresses sustainable management of primary production and harvesting of living natural resources and recognises the need to consider the livelihood of project-affected parties, including vulnerable groups whose access to, or use of, biodiversity or living natural resources may be affected by a project.	The Forestry Commission Act, 1999 (Act 571) establishes the Commission to be responsible for the regulation of the utilization and conservation of forest and wildlife resources. The Forest and Wildlife Policy, 2012, objectives include managing and enhancing the ecological integrity of the forest, savannah, wetlands, and other ecosystems for the conservation of biological diversity.	The law does not emphasize the protection of livelihood sources for project-affected parties	More attention should be given to the protection of livelihood sources for project-affected parties during the implementation of project activities.
OS 7: Vulnerable Groups	OS 7 ensures inclusion, protection, and participation of vulnerable groups in project planning and benefits.	The Constitution of Ghana (1992); Gender Policy (2015); Persons with Disability Act, 2006 (Act 715).	The law does not place emphasis on vulnerable groups in project areas	Beyond consultation with project-affected communities stated in LI 1652, more attention, including continuous consultations, will be given to vulnerable groups in project areas.

AfDB Operational Safeguards	Summary of Core Requirements	Ghana Laws, Policies and Legislative Instruments	Gaps Identified in Ghana System	Measures to Bridge Gaps
OS 8: Cultural Heritage	OS 8 recognizes that cultural heritage provides continuity in tangible and intangible forms between the past, present and future. It sets out measures designed to protect cultural heritage throughout the project life cycle.	Ghana National Museum Act, 1969 (N.L.C.D. 387) establishes and governs the operations of the Ghana Museum and Monuments Board to acquire, protect, conserve, and document the Nation's movable and immovable material cultural heritage for posterity.	The regulations and policies do not set out measures designed to protect cultural heritage throughout the project life cycle.	International best practice such as provided in the ESSA, must be applied to address the protection of intangible and tangible cultural heritage/assets throughout the project life cycle
OS9: Financial Intermediaries	OS9 recognizes that strong domestic capital and financial markets, and access to finance are important for economic development, growth, and poverty reduction. This OS addresses the E&S requirements associated with intermediated financing through financial and non-financial institutions.	Regulatory instruments such as the Banking and Financial Institutions Act, 2004 (Act 673); Environmental Protection Agency Act, 2025 (Act 1124); Environmental Assessment Regulations, 1999 (LI 1652) provide general guidance, but they do not impose specific obligations on financial intermediaries to adopt ESMS or conduct E&S risk assessments.	There is no clear legal mandate for financial intermediaries to implement ESMS or carry out E&S due diligence. Institutional awareness and capacity are limited, monitoring mechanisms are underdeveloped, and formal grievance processes are rarely embedded in intermediary operations.	Regulatory frameworks should be strengthened to require ESMS in financial intermediary operations, supported by detailed guidelines, training programs to build internal capacity, formalized grievance redress systems, and enhanced coordination between financial and environmental oversight bodies to ensure compliance

AfDB Operational Safeguards	Summary of Core Requirements	Ghana Laws, Policies and Legislative Instruments	Gaps Identified in Ghana System	Measures to Bridge Gaps
OS 10: Stakeholder Engagement and Information Disclosure	OS 10 recognises the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice.	Environmental Assessment Regulations, 1999 (LI 1652) Sections 15 and 17 require a proponent to initiate a public information and consultation Programme for the area likely to be affected by the undertaking	Lack of detailed national stakeholder engagement guidelines and proactive disclosure requirements.	Develop a national stakeholder engagement framework; institutionalise participatory planning and grievance redress systems.

2.10 Relevant Institutions



The relevant institutions who by virtue of their statutory mandate and functions, are relevant in the ESSA process include:

- Ministry of Finance;
- Ministry of Local Government, Chieftaincy, and Religious Affairs;
- Environmental Protection Authority;
- Social Investment Fund;
- Youth Employment Agency;
- National Entrepreneurship and Innovation Programme;
- National Alternative Employment and Livelihood Programme
- GRATIS Foundation; and
- ARB Apex Bank.

Table 2. 10 Relevant Institutions and Their Mandates/Roles

<i>Institutions</i>	<i>Summary of Mandates/Roles</i>
Ministry of Finance (MoF)	<p>The MoF is mandated to ensure macroeconomic stability and sustainable economic growth through the formulation and implementation of sound fiscal and financial policies. It is responsible for mobilizing and managing public resources, preparing and overseeing the national budget, managing public debt, coordinating external aid, and promoting efficient public financial management.</p> <p>The Ministry also provides oversight for the financial sector and supports private sector development by creating an enabling environment for investment, all aimed at achieving inclusive development and poverty reduction.</p> <p>The MoF is the Executing Agency on the GWYESCO project and will be responsible for leadership, coordination, and oversight of the Programme. The MoF has designated the Social Investment Fund (SIF) as the coordinating agency, alongside the other partners, civil society organizations, women and youth entrepreneurs and groups, among others.</p>



<p>Ministry of Local Government, Chieftaincy, and Religious Affairs (MLGCRA)</p>	<p>The Ministry is responsible for promoting good governance, decentralization, and rural development. It focuses on policy formulation, local governance, and the efficient management of human settlements.</p> <p>The Ministry oversees the chieftaincy institution and religious affairs, promoting peace, tolerance, and good governance through policy development and coordination. Additionally, it ensures the promotion of customary law, supports traditional and religious institutions, and plays a key role in national development planning.</p> <p>MLGCRA will be involved in business development services training and will train more than 10,000 beneficiaries (primarily women and youth), especially in project intervention areas.</p>
<p>Environmental Protection Authority (EPA)</p>	<p>The EPA is the main government body responsible for managing and protecting the environment. Established under Act 490 in 1994, the EPA enforces environmental regulations, conducts impact assessments, monitors pollution, promotes public awareness, and supports sustainable natural resource management. It plays a key role in ensuring environmental sustainability and public health across the country.</p> <p>Under the GWYESCO program, the EPA will play a key regulatory and oversight role in ensuring that E&S safeguards are complied with, particularly for sub-components or activities that may pose E&S risks.</p>
<p>Social Investment Fund</p>	<p>The SIF is a Ghanaian government initiative established in 1998 in collaboration with the AfDB and the United Nations Development Programme. Its primary objective is to reduce poverty in both rural and urban communities by providing targeted assistance through small-scale, demand-driven projects.</p> <p>SIF operates as a rapid, reliable, and flexible mechanism for channelling resources to impoverished communities, contributing to Ghana's broader poverty reduction strategies. Additionally, SIF offers consultancy services to both public and private organizations, leveraging its expertise in social development initiatives.</p> <p>SIF will be responsible for the day-to-day implementation of the Programme as the coordinating agency. They will be coordinating with all the partner institutions.</p>



<p>Youth Employment Agency (YEA)</p>	<p>The YEA is tasked with creating sustainable employment opportunities for the youth. Established under the Youth Employment Act, 2015, it operates under the Ministry of Labour, Jobs, and Employment. The YEA focuses on developing, coordinating, and supervising youth employment Programmes aligned with national development goals, with a mission to address youth unemployment and facilitate job creation across the country.</p> <p>Under the GWYESCO, YEA will train about 28,000 youth beneficiaries under DLI 2.</p>
<p>National Entrepreneurship and Innovation Programme (NEIP)</p>	<p>The NEIP is a Ghanaian government initiative that supports startups and small businesses through training, funding, and business development services. It aims to promote entrepreneurship, job creation, and economic growth. Key Programmes include the Presidential Pitch, Greenhouse Initiative, and the Adwumawura Programme, which targets empowering 10,000 youth entrepreneurs annually with funding, mentorship, and market access.</p> <p>Under the GWYESCO Programme, the NEIP is responsible for delivering entrepreneurship training, business incubation, and support services to youth- and women-led MSMEs to enhance enterprise growth, job creation, and access to finance.</p>
<p>National Alternative Employment and Livelihood Programme (NAELP)</p>	<p>The NAELP is mandated to design, implement, and coordinate sustainable livelihood initiatives aimed at providing alternative sources of income and employment for youth, women, and vulnerable groups in mining-affected communities across Ghana. Its key objectives include creating employment opportunities for displaced illegal miners and other vulnerable groups, rehabilitating and restoring degraded lands for productive use, offering vocational, technical, agricultural, digital, and entrepreneurial training especially to youth and women and supporting regulated cooperative mining that aligns with environmental protection standards.</p>
<p>GRATIS Foundation</p>	<p>The GRATIS Foundation is a Ghanaian non-profit organization dedicated to promoting industrialization and technology transfer, particularly among MSMEs. Established in 1987 by the Government of Ghana, its mission is to enhance the country's industrial development by providing technical training, manufacturing engineering products, and offering business support services.</p> <p>The foundation operates through a network of regional centers across Ghana, delivering services such as skills training in welding, fabrication, and machining, as well as producing agro-processing equipment and renewable energy technologies. Under the GWYESCO, GRATIS Foundation would be responsible for training about 10,000 project beneficiaries under RA1 (DLI 3).</p>

ARB Apex Bank	<p>The ARB Apex Bank serves as a "mini" central bank for Ghana's Rural and Community Banks (RCBs), providing them with financial, technical, and regulatory support. Established in 2000 and commencing operations in 2002, the bank is owned by the RCBs and the Government of Ghana.</p> <p>Its primary functions include offering liquidity support, managing cheque clearing, facilitating remittances, and ensuring compliance with banking regulations. The bank plays a crucial role in strengthening Ghana's rural financial infrastructure and promoting economic development.</p> <p>ARB Apex Bank will act as the financial intermediary through a tripartite agreement between MoF/SIF and ARB Apex Bank, responsible for managing and disbursing funds under the revolving facility, while ensuring conformity with agreed financial procedures.</p>
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2.11 Stakeholder Consultation



Stakeholder consultation/engagement is a crucial aspect of the ESSA process, ensuring that the project is implemented and managed in a manner that addresses the concerns of affected and interested parties. Engagement with stakeholders, particularly the project implementing institutions unearthed insights that informed the assessment of E&S management capacities. The stakeholder consultations were conducted in line with Operational Safeguard (OS) 10. The outcomes of the consultations have been incorporated into the ESSA and the proposed Programme Action Plan.

This chapter outlines the stakeholder consultation activities undertaken as part of the ESSA process including the methods employed for the consultations, identification and categorisation of stakeholders, engagement issues and highlights of the consultation outcomes and information disclosure.

2.12 Stakeholder Classification

The relevant stakeholders have been grouped into various categories including implementing institutions, key government institutions, regulatory institutions, and financial institutions (Table 2.11).

Table 2. 11 Stakeholder Categories

Category	Stakeholder(s)
Implementing/ Coordinating institution	<ul style="list-style-type: none">• Social Investment Fund (SIF)
Key government institutions	<ul style="list-style-type: none">• Ministry of Finance (MoF)• Youth Employment Agency (YEA)• National Entrepreneurship and Innovation Programme (NEIP)• National Alternative Employment and Livelihood Programme (NAELP)• Ministry of Local Government, Chieftaincy, and Religious Affairs (MLGCRA)• GRATIS Foundation
Regulatory institutions	<ul style="list-style-type: none">• Environmental Protection Authority (EPA)
Financial institution	<ul style="list-style-type: none">• ARB Apex Bank



2.13 Stakeholder Consultation Approach

Stakeholders were notified for engagement through introductory phone calls/letters. After the notification and confirmation of appointment with stakeholders, the team of consultants conducted the engagements with the various stakeholders on the scheduled meeting days.

The consultations were conducted primarily through interviews (face-to-face and virtual) using interview guides. The schedule for the engagement is presented as Appendix 4. During the consultations, the details of the GWYESCO Programme was presented to participants after discussions were had, based on the various discussion guides prepared (Table 2.12). Subsequent communication with stakeholders was also held via emails, text messages and phone calls as follow-up to clarify any information provided during the interview.

Table 2.12 Engagement Issues

Stakeholder	Issues
SIF	<ul style="list-style-type: none">• Institutional capacity and past experience in implementing E&S safeguards in similar projects• Internal systems, procedures, and staffing for environmental and social risk management as the Coordinating Agency• Specific roles and responsibilities of the Environmental, Social, and Gender Safeguards Officer as the Coordinating Agency• Coordination with other agencies (EPA, GEA, Ministry of Gender, Children and Social Protection on safeguards implementation• Data collection, monitoring, and reporting processes for E&S compliance• Community-level engagement strategies, especially in Northern Ghana's intervention areas
MoF	<ul style="list-style-type: none">• Oversight and coordination mechanisms for environmental and social safeguards compliance across implementing agencies• Allocation of financial and human resources for implementing E&S risk mitigation measures• Institutional arrangements for GRM and stakeholder engagement• Monitoring and reporting systems for E&S performance, including alignment with DLIs

YEA	<ul style="list-style-type: none"> • Approaches for identifying and addressing social risks (e.g., gender-based violence, youth exploitation, discrimination) in employment promotion activities • Institutional capacity to implement and monitor safeguards in apprenticeship and vocational training Programmes • Collaboration with EPA, MoGCSP, and training institutions to integrate environmental awareness and social safeguards in youth employment Programmes • Strategies to promote inclusion of vulnerable youth (e.g., youth in conflict-affected areas, persons with disabilities)
NEIP	<ul style="list-style-type: none"> • Role of NEIP on the project • E&S risk assessment protocols for businesses or beneficiary supported • Dedicated personnel or units for handling E&S issues? • Are there policies for ensuring inclusion of marginalised groups especially women, youth, PWDs? • Is there a Grievance Redress Mechanism in place? • How often is monitoring conducted for beneficiaries? • Any experience with Donor-Funded Projects?
GRATIS Foundation	<ul style="list-style-type: none"> • Core mandate of GRATIS Foundation • Operational areas of GRATIS Foundation
EPA	<ul style="list-style-type: none"> • Potential environmental, social and governance risks associated with the Programme activities that ought to be considered. • Institutional capacity/support for environmental monitoring compliance in Northern Ghana, especially in project intervention areas.



2.14 Highlights of Consultations



Highlights of discussions from the stakeholder engagements are summarised in Table 2.13

Table 2. 13 *Highlights of Stakeholder Consultations*

Stakeholder	Key Highlights
EPA	<ul style="list-style-type: none">• Permits will be required prior to the commencement of renovation works.• The permit will be specific to each of the sites to be renovated• An initial assessment (by completing Form EA 1 (Appendix 3)) will also be necessary to secure the permit.• Since the intervention targets 50% of women, issues related to gender-based violence (GBV), sexual exploitation and abuse (SEA), and sexual harassment (SH) must be adequately addressed.• The EPA can provide training and participate in monitoring activities.• There are EPA regional offices across all regions that offer technical assistance on the ground.• Government institutions often fail to obtain the necessary permits before starting renovation or minor construction works. Efforts must be made to ensure compliance.



YEA	<ul style="list-style-type: none"> • Jobs created through the GWYESCO project must be sustainable, with a clear exit plan in place for youth training Programmes. • Job creation initiatives should align with the socio-economic context of the target communities. For example, the youth in the Ashanti Region tend to exhibit a stronger entrepreneurial spirit compared to those in the Northern Region. Such regional dynamics must be taken into account when designing interventions. • The potential of the youth in each community should be thoroughly explored through extensive stakeholder engagement to ensure tailored and impactful programming. • Historically, training Programmes have been limited to a narrow scope, such as dressmaking and hairdressing. The GWYESCO project should diversify its offerings to include a broader range of skills and trades. • Graduate training Programmes must also be incorporated, as graduate unemployment remains a significant challenge. • The YEA has a dedicated Monitoring and Evaluation Unit, as well as a Beneficiary Unit, that conduct follow-ups with Programme participants. The Beneficiary Unit is also responsible for addressing grievances raised by participants.
SIF	<ul style="list-style-type: none"> • SIF has a functional and effective GRM with toll-free contact lines. This system could be adopted for the Project. • SIF operates in all 16 regions of Ghana and maintains four zonal offices to support regional implementation. • Monitoring is conducted quarterly by the Coordinating Agency, while zonal offices carry out monthly monitoring activities. Monitoring reports are prepared and submitted accordingly. • SIF has an existing Gender-Based Violence policy, which could be adopted and utilized by all stakeholders involved in the Project. • Currently, there is no dedicated E&S staff. E&S consultants are typically engaged on a need basis; however, there are plans to recruit permanent E&S personnel to ensure consistent compliance. • A major challenge encountered in previous projects was compliance with reporting timelines, which often experienced delays. Additionally, there were delays in securing EPA permits for certain civil works, although permits were eventually obtained. Lessons have been learned from these experiences to improve future performance.



NEIP	<ul style="list-style-type: none"> • NEIP's mandate includes the training of entrepreneurs and providing funding for start-up businesses. Once start-ups grow and become sustainable, the GEA continues the support through its established systems. • E&S impacts associated with start-up businesses are often not considered, and there is currently no dedicated E&S personnel in place. • The institution has a Corporate and Legal Affairs Directorate that handles harassment and other sensitive issues. • A Grievance Redress Mechanism (GRM) exists but is limited to internal staff. It does not cover Programme beneficiaries, highlighting the need to develop a more inclusive GRM for all stakeholders. • Field-level monitoring is currently inadequate, but there are plans to establish offices in all 16 regions to strengthen monitoring and supervision. • NEIP implements targeted interventions for women and people with disabilities (PWDs). For example, the Adwumawura Project is designed to benefit 60% women and PWDs.
GRATIS Foundation	<ul style="list-style-type: none"> • The core mandate of GRATIS Foundation is to promote industrialization through the development and transfer of appropriate technologies and innovations to industry, with a focus on MSMEs. • GRATIS provides skills training for youth across the country. Key training areas include welding, fabrication, auto mechanics, and dressmaking. • Industries often request graduates from Gratis to fill technical roles • A Basic Education Certificate is required for participation in the training Programmes. • GRATIS has an established Organizational Health and Safety Policy, and safety officers are stationed at all training sites to oversee compliance. • There have been minor occupational health and safety incidents, no fatalities have been recorded. There is, however, a need for capacity-building training for safety officers to better supervise trainees and prevent incidents. • Women actively participate in the training Programmes, especially within the dressmaking department • Start-up capital support may be provided to trainees upon completion of the Programme, often in the form of machinery or equipment to help them launch entrepreneurial ventures.



ARB Apex Bank	<ul style="list-style-type: none"> • Apex Bank serves as the supervisory agency for rural banks in Ghana. • It provides regulatory oversight, technological support, capacity building, fund management, and auditing services to all rural banks. • Currently, there is no Environmental and Social Management System (ESMS) in place. However, the bank has recently appointed an ESG Manager to develop an ESMS, which is expected to be operational by the end of the year. • Apex Bank is pursuing accreditation from the Green Climate Fund and is implementing policies aligned with this objective. • Rural banks conduct screening of beneficiaries before disbursing funds, based on established eligibility criteria. • Systems are in place to monitor disbursements. Apex Bank conducts follow-up monitoring one month after funds are disbursed to beneficiaries. • A functional grievance mechanism exists at all rural banks, and Apex Bank is also able to directly receive and address grievances from any rural bank
NAELP	<ul style="list-style-type: none"> • The core mandate of NAELP is to provide sustainable alternative livelihoods for individuals affected by the government's clampdown on illegal mining. The Programme is also responsible for the reclamation and restoration of degraded lands impacted by illegal mining activities. • Operational focus is primarily in mining communities. • The Programme has a robust community engagement strategy, ensuring that interventions are informed by community needs and priorities. • A monitoring framework is in place, with monthly follow-ups conducted on beneficiaries to track progress and impact. • NAELP currently operates offices in selected mining regions, with plans to establish regional offices in all 16 regions, each led by designated coordinators. • While the primary target is mining communities, interventions also extend beyond these areas to include other vulnerable populations. • Alternative livelihood programs previously implemented include fish farming, poultry production, and agro-processing. • In some cases, beneficiaries are organized into cooperatives to enhance sustainability and collective growth. • The Programme currently lacks dedicated Environmental and Social (E&S) personnel, which may limit the integration of safeguards in program delivery.



2.15 Information Disclosure

Information will be disclosed on an ongoing basis as appropriate throughout the lifecycle of the Programme, in both English and relevant local languages as necessary, and in a manner that is accessible and culturally appropriate, considering any specific needs of groups including persons with disability and women.

A virtual validation workshop was organized by the Coordinating Agency on Thursday, June 12, 2025, with the participation of all relevant stakeholders to discuss the findings of the ESSA. The list of participants is provided in Appendix 5. The final ESSA will be disclosed both in-country and on the AfDB website.

SECTION 3:ASSESSMENT OF PROGRAMME IMPLEMENTING CAPACITY AND PERFORMANCE

3.0 ASSESSMENT OF THE BORROWER'S ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM


One of the key guiding principles for the Bank's RBF approach is to identify and strengthen the institutional capacity needed for an RBF-supported Programme to attain its expected results, particularly with respect to E&S risk management. This chapter assesses the adequacy of the borrower's policy, legal, regulatory and institutional framework in managing environmental and social risks associated with the Programme – in relation to the ISS – with mitigation measures proposed for filling identified gaps.

The assessment focuses on the OSs most relevant to the GWYESCO project design, scope activities, which include:

- OS 1: Assessment and Management of Environmental and Social Risk and Impact;
- OS 2: Labour and Working Conditions;
- OS 3: Resource Efficiency and Pollution Prevention and Management;
- OS 4: Community Health, Safety and Security;
- OS 7: Vulnerable Groups;
- OS 8: Cultural Heritage;
- OS 9: Financial Intermediaries; and
- OS 10: Stakeholder Engagement and Information Disclosure.

Table 3. 1 System Assessment, Gaps Identified, and Proposed Mitigation Measures

System Assessment	Gaps	Proposed Mitigation Measures to Fill Gaps
<p><i>Operational Safeguard 1: Assessment and Management of Environmental and Social Risks and Impact</i> <i>OS 1 requires borrowers to establish and maintain robust environmental and social management systems capable of identifying, assessing, and mitigating potential environmental and social risks and impacts, as well as monitoring the implementation of mitigation strategies throughout the project cycle. The assessment presented in this section evaluates the adequacy of Ghana's national frameworks in relation to the requirements of OS 1.</i></p>		

<p>Ghana has a relatively comprehensive set of environmental policies and legislation that provide a foundation for managing environmental risks and impacts. The EPA (originally established under the former Environmental Protection Agency Act, 1994, Act 490) wields oversight responsibility over environmental protection matters, including compliance and enforcement. The new Environmental Protection Act, 2025 (Act 1124) and already existing Environmental Assessment Regulations, 1999 (LI 1652) require environmental and social assessment of all undertakings likely to significantly affect the natural and physical environment, people and communities. LI 1652 sets out mandatory procedures for conducting Environmental Impact Assessments (EIA) and preparing Environmental Management Plans (EMP) for undertakings likely to significantly affect the natural and physical environment, people and communities. Although social impacts/risks are expected to be considered in environmental assessments, the LI 1652 neither makes provides specific guidance relating to social issues such as SEA/SH, GBV, persons with disability, etc, nor points to other relevant legislation that could provide some guidance. Again, as part of compliance processes, all permitted undertakings/operations/projects are required to submit an Annual Environmental Report (AER; for reporting on various environmental, health and safety indicators to enable monitoring and enforce compliance). However, the AER does not make provision for social risks/impacts, thereby limiting monitoring by the EPA on such social matters.</p> <p>The LI 1652 also provides for addressing grievances from affected persons and communities. Public consultations are a mandatory part of the EIA process, and stakeholders are invited to submit concerns or objections in writing during the review period. The EPA is responsible for receiving, documenting, and responding to public comments. If unresolved, grievances may be referred to the Environmental Assessment Review Panel, which has the authority to hold public hearings and recommend revisions or denial of environmental permits. However, these formal grievance mechanisms are primarily activated during the permitting phase, with limited provisions for ongoing grievance resolution during project implementation. Additionally, awareness of these mechanisms among local communities is often low, and</p>	<ul style="list-style-type: none"> • Limited integration of social risk considerations into environmental impact assessment procedures. • Inadequate enforcement and monitoring of E&S requirements especially at sub-national levels. • Weak coordination among institutions responsible for environmental, gender, youth, and social protection mandates. • Absence of tailored environmental and social risk management tools for MSMEs. • Fragmented and underutilised grievance redress systems. 	 <ul style="list-style-type: none"> • Enhance inter-agency coordination mechanisms between EPA, SIF/MoF, YEA, GRATIS Foundation, MLGCRA, NEIP and ARB Apex Bank. • Provide capacity-building support to district-level E&S officers and safeguards focal persons within implementing agencies. • Develop simplified environmental and social screening tools for MSMEs and entrepreneurship Programmes. • Establish or strengthen institutional grievance redress mechanisms with specific provisions for youth, women, and vulnerable groups. • Harmonise monitoring and reporting protocols and align them with AfDB E&S safeguards and results-based financing requirements. • Adopt the existing functional and effective GRM from SIF for the GWYESCO Project.
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there is no centralised or digital system for tracking or reporting grievance outcomes.

The National Environmental Policy (2012), National Sanitation Policy, National Climate Change Policy, and Hazardous and Electronic Waste Control and Management Act further reinforces the country's commitment to sustainable development and environmentally sound practices.

While the legal framework is generally sound, enforcement capacity remains uneven, particularly in Northern Ghana and other decentralised jurisdictions. Moreover, environmental sustainability practices have not been consistently integrated into national entrepreneurship or skills development Programmes.

Ghana also possesses a well-established legal framework for social protection and inclusion. The Labour Act, 2003 (Act 651) guarantees workers' rights, occupational health and safety, and fair employment conditions. The Children's Act, 1998 (Act 560), and other child protection instruments prohibit child labour and promote the welfare of children and youth. The Domestic Violence Act, 2007 (Act 732) and the National Gender Policy provide a legal basis for addressing sexual and gender-based violence (SGBV) and ensuring women's empowerment. The Persons with Disability Act, 2006 (Act 715) guarantees equal opportunities and protection for persons with disabilities.

Despite these strong legal provisions, the implementation of social safeguards is fragmented. Social considerations such as gender, youth inclusion, and protection against SGBV are not always fully integrated into environmental assessment procedures. Institutional mandates often overlap, leading to coordination challenges, and decentralized agencies lack the resources and systems needed to implement and monitor social sustainability measures effectively.

System Assessment	Gaps	Proposed Mitigation Measures to Fill Gaps
<p>Operational Safeguard 2: Labour and Working Conditions <i>OS 2 requires borrowers to ensure fair, safe, and inclusive working conditions. This includes respecting workers' rights, enforcing health and safety standards, and preventing discrimination, child labour, and exploitation. The assessment presented in this section evaluates the adequacy of national frameworks in relation to the requirements of OS 2.</i></p>		
<p>Ghana's labour regime is primarily governed by the Labour Act, 2003 (Act 651), which outlines the rights and responsibilities of employers and employees, conditions of employment, and protection from unfair treatment. Additional legislative instruments, such as the Factories, Offices and Shops Act (Act 328) and the Workmen's Compensation Act (PNDCL 187), address workplace safety and employee compensation.</p> <p>These instruments broadly align with the principles of OS 2, including fair treatment, non-discrimination, and occupational health and safety. However, enforcement remains a challenge, particularly within informal sectors, MSMEs, and youth employment schemes such as apprenticeships, where child labour, inadequate safety standards, and limited oversight persist.</p> <p>Institutions such as the Labour Department, National Labour Commission, and implementing partners like the Youth Employment Agency (YEA) and GRATIS Foundation play key roles, though their capacity to monitor working conditions within small enterprises and training centres is limited.</p> <p>The legal framework is largely adequate, but implementation systems require strengthening. Institutional capacity, particularly at decentralised levels and within informal employment settings, needs targeted support.</p>	<ul style="list-style-type: none"> • Limited enforcement of labour laws in informal sectors and MSMEs. • Weak monitoring of occupational health and safety (OHS) conditions in vocational training and apprenticeship schemes. • Inadequate safeguards for apprentices and young workers, including child labour risk. • Lack of tailored guidelines for implementing agencies on labour protections in RBF settings. 	<ul style="list-style-type: none"> • Develop and enforce minimum OHS and labour standards for MSMEs and training institutions. • Provide targeted training on labour rights and OHS for staff of SIF, YEA, GRATIS Foundation, and partners. • Create model contract templates and compliance checklists for apprenticeships and enterprise support Programmes. • Strengthen the Labour Department's role in monitoring and enforcement at decentralised levels through developing simplified labour compliance checklists and monitoring tools for MSMEs and apprenticeships, and training district-level Labour Officers on labour safeguards and occupational health and safety.

System Assessment	Gaps	Proposed Mitigation Measures to Fill Gaps
Operational Safeguard 3: Resource Efficiency and Pollution Prevention and Management <i>OS 3 requires borrowers to promote sustainable use of resources, including energy, water and raw materials, and minimise adverse impacts related to pollution, waste, and hazardous materials. The assessment presented in this section evaluates the adequacy of national frameworks in relation to the requirements of OS 3.</i>		
<p>Ghana's environmental legislation, notably the Environmental Protection Act, 2025 (Act 1124), and the Environmental Assessment Regulations, 1999 (LI 1652), provides a basis for regulating pollution, waste management, and efficient use of natural resources. There is also the Hazardous and Electronic Waste Control and Management Act which makes provisions for the management of electrical and electronic waste and other hazardous wastes. These laws are supplemented by technical guidelines and standards administered by the Ghana Standards Authority (GSA).</p> <p>At the policy level, Ghana has begun integrating circular economy and green jobs concepts, but operational guidance and tools for implementation are underdeveloped.</p> <p>Ghana's framework for pollution prevention and resource efficiency is legally sound but operationally weak especially in MSME contexts. There is a need for simplified tools and training to integrate resource efficiency principles into business development services and financial support Programmes.</p>	<ul style="list-style-type: none"> • Limited oversight of environmental performance and resource efficiency in MSMEs supported by government programs. • Lack of simplified screening and compliance tools for small-scale enterprises. • Weak integration of green economy principles into business development services. 	<ul style="list-style-type: none"> • Develop simplified environmental screening and mitigation tools for MSMEs and service providers. • Train MSME support agencies (GEA, NEIP, Apex Bank) to assess and manage pollution risks. • Promote green business models and resource efficiency training as part of enterprise development. • Strengthen collaboration between EPA and implementing institutions to monitor cumulative environmental impacts.
Operational Safeguard 4: Community Health and Safety and Security <i>OS 4 requires borrowers to safeguard the health, safety, and security of communities affected by development interventions, including exposure to physical, environmental, and social risks. The assessment presented in this section evaluates the adequacy of national frameworks in relation to the requirements of OS 4.</i>		

System Assessment	Gaps	Proposed Mitigation Measures to Fill Gaps
<p>Although Ghana lacks a unified law governing community health and safety, several existing regulations partially address these concerns. The Public Health Act, 2012 (Act 851) contains provisions related to disease control and sanitation. The Environmental Protection Act provides for environmental health safeguards, while institutions like the National Disaster Management Organization (NADMO) play a role in managing community-level risks and emergencies.</p> <p>Local authorities, traditional leaders, and service delivery agencies such as the Ghana Health Service have limited resources to respond to emerging risks. Community engagement in safety planning is also generally weak.</p> <p>Ghana's legal and institutional framework partially meets the requirements of OS 4. A more structured approach to risk assessment, especially in communities hosting project activities, and integration of GBV considerations are needed.</p>	<ul style="list-style-type: none"> • No unified legal or operational framework for assessing and managing community health and safety risks in projects. • Inadequate assessment of GBV, traffic safety, or exposure to hazards in skills training or enterprise sites. • Weak emergency preparedness and coordination with local health and safety actors (e.g., NADMO, GHS). • Limited awareness and community involvement in project risk planning. 	<ul style="list-style-type: none"> • Integrate community health and safety assessments into project planning, especially for training infrastructure and youth-focused Programmes. • Develop GBV risk mitigation protocols and referral mechanisms in partnership with MoGCSP. • Establish emergency preparedness plans for participating institutions and enterprises. • Include local governments and health officers in safeguards monitoring and incident response.
<p>Operational Safeguard 7: Vulnerable Groups <i>OS 7 requires that development interventions protect and promote the rights of vulnerable and marginalized groups, including women, youth, persons with disabilities, and those living in fragile regions. The assessment presented in this section evaluates the adequacy of national frameworks in relation to the requirements of OS 7.</i></p>		

System Assessment	Gaps	Proposed Mitigation Measures to Fill Gaps
<p>Ghana has made significant legal and policy strides in protecting vulnerable groups. The Persons with Disability Act, 2006 (Act 715), the Children’s Act, 1998 (Act 560), and the National Gender Policy provide a solid basis for promoting inclusion and equity.</p> <p>The Ministry of Gender, Children and Social Protection (MoGCSP) leads national policy coordination, while decentralised departments are responsible for implementation. Despite this foundation, practical inclusion of vulnerable groups remains limited. Key barriers include weak identification systems, limited local-level data, insufficient targeting tools, and weak coordination between implementing agencies.</p> <p>Ghana’s framework is strong in principle but requires better operationalisation. To meet the requirements of OS7, the GWYESCO project must embed inclusive design features, strengthen data systems, and promote community-level outreach to ensure no groups are left behind.</p>	<ul style="list-style-type: none"> • Limited operational mechanisms to identify and target vulnerable groups (e.g., persons with disabilities, youth, at-risk populations). • Inconsistent use of disaggregated data to monitor social inclusion in training and MSME support. • Lack of tailored engagement strategies for marginalised communities, especially in Northern Ghana. • Weak coordination among implementing agencies to deliver inclusive services. 	<ul style="list-style-type: none"> • Develop inclusive implementation guidelines that prioritize participation of women, youth, and persons with disabilities. • Establish clear eligibility criteria and social targeting indicators for project beneficiaries. • Build the capacity of implementing agencies to collect and use disaggregated data. • Leverage CSOs and community-based groups to reach vulnerable populations.
<p>Operational Safeguard 8: Cultural Heritage <i>OS 8 requires borrowers to protect both tangible and intangible cultural heritage from the adverse impacts of development, and encourages respectful engagement with cultural values and traditional knowledge. The assessment presented in this section evaluates the adequacy of national frameworks in relation to the requirements of OS 8.</i></p>		

System Assessment	Gaps	Proposed Mitigation Measures to Fill Gaps
<p>Ghana's national legal framework for cultural heritage protection is anchored in two primary instruments: the National Museum and Monuments Board Act, 1969 (NLCD 387) and the Chieftaincy Act, 2008 (Act 759). The former establishes the Ghana Museums and Monuments Board (GMMB) as the statutory agency responsible for identifying, preserving, and managing Ghana's physical cultural assets, including historical buildings, archaeological sites, and national monuments. The latter formally recognizes the roles and authority of traditional leaders in preserving and promoting the intangible cultural heritage of their communities.</p> <p>In addition, cultural protection is indirectly supported by the Local Governance Act (2016), which encourages local participation in development planning, and the Environmental Assessment Regulations (LI 1652), which require the inclusion of potential impacts on cultural resources in EIA processes, although this is not consistently applied or enforced in practice.</p> <p>The GMMB is the primary institution mandated to safeguard the country's cultural heritage. It is responsible for maintaining a national register of heritage sites and ensuring that development activities do not compromise historically or culturally significant locations. The Ministry of Tourism, Culture and Creative Arts provides policy direction, while traditional authorities serve as the custodians of community-level traditions, sacred sites, and intangible practices.</p> <p>Despite clear institutional roles, there are significant operational limitations. The GMMB lacks the personnel, logistics, and funding to effectively screen all development projects or enforce cultural heritage protections across the country. Moreover, there is limited formal coordination mechanism between GMMB and other government institutions. As a result, cultural heritage issues are often overlooked unless an intervention directly threatens a well-known physical monument.</p>	<ul style="list-style-type: none"> • Limited systematic cultural heritage screening during project preparation. Projects which involve infrastructure rehabilitation, land use, and community-level interventions in culturally sensitive areas, do not currently include formal heritage impact assessments unless flagged during environmental screening. • Limited recognition of intangible cultural heritage in safeguards processes. Traditional practices, sacred landscapes, oral traditions, and spiritual beliefs are rarely considered in risk assessments, despite their importance to community identity and cohesion. • Weak integration between implementing agencies and heritage institutions. The GMMB is rarely involved in project planning processes, and traditional authorities are not consistently consulted during project design, particularly outside of land acquisition contexts. • No "chance finds" procedure is widely adopted in development projects, increasing the risk of inadvertent destruction of unregistered cultural artifacts during excavation or construction. 	<ul style="list-style-type: none"> • Develop and apply a cultural heritage screening tool during site selection, infrastructure design, and community engagement processes, in collaboration with the GMMB and traditional authorities. • Establish a "chance finds" procedure to guide the management of unexpected discoveries of cultural or archaeological significance during project implementation. • Build awareness among project staff, contractors, and implementing partners about the importance of cultural heritage and the protocols for its protection. • Engage traditional leaders and cultural custodians early in the planning process to identify sacred sites, heritage-sensitive areas, and culturally appropriate implementation strategies.

System Assessment	Gaps	Proposed Mitigation Measures to Fill Gaps
<p><i>Operational Safeguard 9: Financial Intermediaries</i> <i>OS 9 ensures that Financial Intermediaries (FIs) receiving AfDB funds establish and maintain adequate environmental and social management systems (ESMS) that are proportional to the risks of their lending activities. FIs are expected to screen sub-projects, apply appropriate safeguards, monitor E&S performance, and report to the Bank.</i></p>		

System Assessment	Gaps	Proposed Mitigation Measures to Fill Gaps
<p>There are no legally binding regulations issued by the Bank of Ghana (BoG) mandating environmental and social due diligence (ESDD) for financial institutions. While the Ghana Sustainable Banking Principles (SBPs) developed by the Ghana Association of Banks (GAB) with BoG support in 2019 encourage banks to integrate ESG considerations into credit and risk management, these principles are voluntary and not enforceable. Principle 1 of the SBPs specifically addresses the integration of ESG risks into lending decisions, and Principle 2 calls for E&S due diligence proportional to the client's risk profile. However, the BoG has not yet issued supervisory guidance or reporting requirements on this front.</p> <p>As a result, implementation of ESG principles among Ghanaian banks remains limited and uneven, particularly among Tier 2 institutions such as Apex Bank and its affiliated rural banks. Furthermore, staff at these institutions often lack the technical capacity to evaluate or monitor environmental and social risks. Coordination between financial intermediaries and regulatory agencies such as the Environmental Protection Agency (EPA) is also weak or non-existent.</p> <p>This presents a risk in the context of the GWYESCO project, where MSMEs may operate in sectors with significant environmental or social footprints—such as agriculture, food processing, and light manufacturing. Without screening mechanisms or ongoing safeguards monitoring, the project may inadvertently support activities with adverse impacts on health, safety, natural resources, or labour conditions.</p>	<ul style="list-style-type: none"> • Lack of regulatory mandate from BoG requiring financial institutions to apply environmental and social safeguards. • Low institutional capacity among Apex Bank and rural/community banks to carry out E&S due diligence or monitor compliance. • No standardized tools or procedures for integrating E&S risk considerations into MSME loan appraisals. • Weak coordination with EPA and other safeguards-related institutions, resulting in limited oversight of MSME activities with potential E&S impacts. 	<ul style="list-style-type: none"> • Develop and institutionalize a proportionate ESMS for Apex Bank, tailored to the nature of MSMEs and in alignment with the Sustainable Banking Principles. • Develop and institutionalise a proportionate ESMS for Apex Bank, tailored to the nature of MSMEs and in alignment with the Sustainable Banking Principles. • Incorporate E&S risk screening into credit appraisal processes, including the use of simplified checklists and risk categorisation tools for low-capacity MSME clients. • Designate E&S focal persons at Apex Bank and regional levels, responsible for overseeing safeguards compliance and capacity building. • Train lending officers and credit teams on environmental and social due diligence, in collaboration with EPA or other technical agencies. • Establish a basic monitoring and reporting system to track the E&S performance of sub-loans financed under the GWYESCO facility.
<p>Operational Safeguard 10: Stakeholder Engagement and Information Disclosure OS 10 requires meaningful engagement of stakeholders throughout the project lifecycle and mandates the disclosure of relevant information in a timely and accessible manner. The assessment presented in this section evaluates the adequacy of national frameworks in relation to the requirements of OS 10.</p>		

System Assessment	Gaps	Proposed Mitigation Measures to Fill Gaps
<p>Stakeholder engagement in Ghana is guided by the Environmental Assessment Regulations (LI 1652), the Local Governance Act, 2016 (Act 936), and the Right to Information Act, 2019 (Act 989). While these instruments promote transparency and community participation, they lack a unified framework for continuous engagement across all project phases.</p> <p>Currently, public consultations are typically limited to one-off EIA processes and not systematically extended to social planning, Programme design, or RBF mechanisms. Women, youth, and vulnerable populations often face cultural, logistical, or informational barriers that prevent full participation.</p> <p>Ghana's regulatory provisions for stakeholder engagement are partially aligned with OS10. To meet AfDB standards, the project must institutionalise inclusive engagement throughout the project cycle, develop a Stakeholder Engagement Plan (SEP), and ensure information is accessible in local languages and formats.</p>	<ul style="list-style-type: none"> • Absence of a unified stakeholder engagement framework applicable across all project phases. • Consultations are often limited to the EIA stage and do not continue during implementation or monitoring. • Limited engagement of marginalized groups, women, and youth in project decision-making. • Weak institutional capacity and tools for meaningful information disclosure and feedback loops. 	<ul style="list-style-type: none"> • Develop a comprehensive Stakeholder Engagement Plan (SEP) aligned with AfDB standards, covering all phases of the project. • Institutionalise consultation processes for all project activities, with tailored approaches for different stakeholder groups. • Ensure timely disclosure of information in accessible formats and local languages. • Establish a functional and inclusive grievance redress mechanism (GRM) linked to the project's monitoring and reporting systems.

3.1 Assessment of the E&S Capacity of Implementing Entities



This section assesses the E&S capacity of the implementing agency and key partner institutions Programme. The assessment focuses on the existing institutional frameworks, human resources, policies, systems in place to identify, manage, and monitor E&S risks throughout the Programme lifecycle, as well as inter-agency coordination on E&S considerations.

3.1.1 Social Investment Fund

The Social Investment Fund, the lead implementing institution for the Programme, operates in all 16 regions of the country and maintains four zonal offices to support regional implementation of its Programmes/projects. There is a robust project monitoring system in place, with the conduct of quarterly monitoring of projects and the zonal offices conducting monthly monitoring. There is also a functional and effective grievance redress mechanism and GBV policy. However, there are no dedicated E&S staff within the institution; E&S consultants are typically engaged as and when required. SIF has plans to recruit permanent E&S personnel to fill this gap.

SIF demonstrates moderate institutional capacity. It has robust monitoring systems and foundational safeguards mechanisms (GRM, GBV policy), but the lack of dedicated E&S staff constrains its ability to ensure consistent safeguards integration. The planned recruitment of permanent E&S personnel is critical and should be prioritized early in Programme implementation.

3.1.2 Youth Employment Agency

Under the GWYESCO, YEA will train about 28,000 youth beneficiaries under DLI 2. The YEA has a dedicated Monitoring and Evaluation Unit, as well as a Beneficiary Unit, that conducts follow-ups with Programme participants. The Beneficiary Unit is also responsible for addressing grievances raised by participants. There is no dedicated E&S unit/personnel to manage E&S issues.

YEA has basic operational capacity for beneficiary management but lacks E&S safeguards expertise. Given its role in training over 28,000 youth, the absence of safeguards staff presents a risk. Additional safeguards training and designation of E&S focal persons are urgently needed.

3.1.3 National Entrepreneurship Innovation Programme

Under the GWYESCO Programme, the NEIP is responsible for delivering entrepreneurship training, business incubation, and support services to youth- and women-led MSMEs to enhance enterprise growth, job creation, and access to finance. E&S risks associated with start-up businesses are often not considered, and there is currently no dedicated E&S personnel in place. The institution has a Corporate and Legal Affairs Directorate that handles harassment and other sensitive issues. A Grievance Redress Mechanism (GRM) exists but is limited to internal staff and

does not cover Programme beneficiaries, highlighting the need to develop a more inclusive GRM for all stakeholders.



NEIP has low E&S capacity. The absence of E&S risk screening in MSME support increases the likelihood of unmitigated environmental or social impacts. Immediate actions are needed to integrate basic E&S considerations into MSME development tools, expand the GRM, and assign safeguards responsibilities.

3.1.4 GRATIS Foundation

Under the GWYESCO, the GRATIS Foundation would be responsible for training about 10,000 project beneficiaries under RA1 (DLI 3). GRATIS has an established Organizational Health and Safety Policy. Safety officers are stationed at all training sites to oversee compliance. There is, however, a need for capacity-building training for safety officers to better supervise trainees and prevent incidents.

GRATIS demonstrates moderate capacity in OHS but limited broader safeguards implementation. Strengthening the skills of safety officers and expanding safeguards coverage to include GBV, inclusion, and environmental concerns will enhance its ability to manage risks under the Programme.

3.1.5 ARB Apex Bank

ARB Apex Bank will act as the financial intermediary, responsible for managing and disbursing funds under the revolving facility, while ensuring conformity with agreed financial procedures. Currently, there is no Environmental and Social Management System (ESMS) in place. However, the bank has recently appointed an ESG Manager to develop an ESMS, which is expected to be operational by the end of the year. A functional grievance mechanism exists at all rural banks, and Apex Bank is also able to directly receive and address grievances from any rural bank.

Apex Bank has initiated progress toward compliance with AfDB OS9. The recent recruitment of an ESG Manager is a promising step, but the successful design and rollout of a fit-for-purpose ESMS, along with staff training and oversight mechanisms, will be critical to ensuring safeguards are applied in MSME financing.

3.1.6 Environmental Protection Authority

Under the GWYESCO Programme, the EPA will play a key regulatory and oversight role in ensuring that E&S safeguards are complied with, particularly for sub-components or activities that may pose E&S risks. The EPA has Regional Offices as well as Area Offices in a number of districts, however, there are budgetary and logistical constraints that hinder effective compliance monitoring at the regional and district levels.



The EPA provides essential regulatory oversight and technical expertise. However, effective participation in GWYESCO will require targeted support for decentralized enforcement and coordination with implementing partners.

3.1.7 Inter-Agency Coordination on E&S Considerations

Government institutions, like private entities, are required to comply with existing E&S regulations, however, adherence is often limited. Enforcement by the EPA remains weak regarding other public sector institutions, where compliance is perceived as a “government-to-government” matter. This dynamic undermines the EPA’s regulatory authority and impedes effective implementation and monitoring of E&S safeguards with respect to government projects and Programmes.

SECTION 4: ENVIRONMENTAL AND SOCIAL SAFEGUARDS SYSTEM STRENGTHENING ACTION PLAN

This chapter outlines the Environmental and Social Safeguards System Strengthening Action Plan developed as part of the ESSA for the GWYESCO Programme. The Action Plan is designed to address identified gaps and capacity constraints within the environmental and social management systems of the implementing agencies. It proposes targeted measures to enhance the effectiveness, consistency, and sustainability of safeguards implementation throughout the Programme lifecycle. The plan sets out priority actions, responsible institutions, indicative timelines, and resource requirements to ensure that environmental and social risks are appropriately mitigated, and development outcomes are sustainably achieved in line with the Bank's ISS and the RBF modality.

Table 3. 2 Programme Action Plan

No.	Issues/Risks	Action Description	Responsibility	Timing	Cost (USD)	Completion Measurement
1.	Inadequate E&S risk management capacity	Strengthen the capacity of key project staff and implementing partners through structured training sessions on AfDB's OSs and Ghana's EA Regulations to ensure effective E&S risk management, thereby enhancing institutional capacity and integrated risk mitigation systems, in accordance with DLI 5	MoF and SIF	Within the first 6 months	40,000	Training reports, number of trainings conducted, and percentage of staff trained
2	Health and Safety Certification	Support partner institutions such as GRATIS Foundation in training officers on Occupational Health and Safety programs. This will enhance the officers' capacity to effectively supervise training activities and help prevent or minimize injuries.	GRATIS Foundation, YEA	Before training commence	40,000	Certificate of participation

No.	Issues/Risks	Action Description	Responsibility	Timing	Cost (USD)	Completion Measurement
3	Weak stakeholder engagement	Develop and implement a comprehensive SEP at national and district/municipal levels to foster transparency and continuous dialogue, supporting institutional strengthening and inclusive participation of all relevant groups, aligned with DLI 5	SIF, MLGCRA and YEA	First quarter	20,000	SEP developed and implemented, and stakeholder feedback recorded
4	Occupational health and safety risks during renovation works	Prepare Labour Management Procedures (LMPs) aligned with OS 2, ensure strict adherence to occupational health and safety standards, and orient contractors and workers on safe practices to safeguard workers during renovation activities, promoting safe wage or self-employment opportunities for women and youth, consistent with DLI 1	SIF	Before renovation works commence	20,000	LMP prepared, OHS plans implemented, and incident reports monitored
5	Gender inequality and exclusion of vulnerable groups	Mainstream gender equality and social inclusion across all activities including skills development, entrepreneurship, and MSME support to increase participation and benefits for women, youth, and vulnerable groups, boosting the number of beneficiaries acquiring STEM, digital, and creative skills, receiving business development training, and accessing finance, as targeted under DLIs 2, 3, and 4	SIF, YEA and NEIP, NAELP	Throughout the Programme implementation	30,000	Inclusion metrics tracked and participation of target groups documented

No.	Issues/Risks	Action Description	Responsibility	Timing	Cost (USD)	Completion Measurement
6	Grievance Redress Mechanism	Establish an effective GRM. SIF already has a functional and effective GRM with tollfree numbers. This should be adopted for the Project and training provided for all other stakeholders thereby supporting transparency and institutional capacity building in line with DLI 5.	SIF	Continuous	15,000	GRM established and number of complaints received/resolved
7	Weak E&S monitoring and compliance	Designate E&S Focal Persons/Specialists at the regional level to oversee monitoring and compliance with E&S requirements, reinforcing institutional systems and risk mitigation throughout implementation, contributing directly to DLI 5	MoF and SIF	Focal Persons to be assigned at the Programme inception and maintained throughout implementation	40,000	E&S Focal Persons/Specialists at post and E&S monitoring reports produced quarterly
8	Inadequate awareness of Programme opportunities at the community level	Conduct targeted outreach campaigns focused on youth, women, and vulnerable groups to increase awareness and participation in skills development and entrepreneurship, increasing the number of people acquiring relevant skills and business services, as specified in DLIs 2 and 3	SIF and MLGCRA	First quarter and ongoing	40,000	Outreach materials distributed and awareness events conducted

No.	Issues/Risks	Action Description	Responsibility	Timing	Cost (USD)	Completion Measurement
9	Poor coordination among stakeholders	Institutionalize quarterly multi-stakeholder coordination meetings to review progress, share lessons, and promptly resolve issues, strengthening overall Programme management and institutional capacity consistent with DLI 5	SIF	Quarterly	40,000	Meeting minutes documented and action plans followed up
10	Limited access to finance for MSMEs	Establish stronger linkages with financial institutions, provide financial literacy training, and support women- and youth-led MSMEs to improve access to finance, increasing the number of MSMEs with financial support in line with DLI 4	SIF and ARB Apex Bank	Continuous	30,000	Number of MSMEs accessing finance and training records
11	Lack of sustainability post-program	Develop and implement exit and sustainability strategies for supported businesses and training initiatives to ensure lasting benefits and continued MSME growth beyond the Programme, supporting overall employment growth and institutional strengthening consistent with DLIs 1 and 5.	SIF, NEIP, NAELP, YEA and GRATIS Foundation	Final year of the Programme	30,000	Exit strategy document prepared and sustainability measures adopted
	Total				345,000	

SECTION 5: ASSESSMENT OF REPUTATIONAL RISK TO THE BANK



5.0 ASSESSMENT OF REPUTATIONAL RISK TO THE BANK

The GWYESCO Programme is laudable, with objectives that align closely with the strategies of both the Government of Ghana and the Bank. However, if the Programme fails to perform satisfactorily from an E&S perspective, it could pose a reputational risk to the Bank. This reputational risk is not negligible and may arise from the following areas:

- Weak environmental and social management capacity;
- Risk of exacerbating local conflicts;
- Unrealised gender equity outcomes; and
- Inadequate grievance redress and stakeholder engagement.

5.1 Weak Environmental and Social Management Capacity

There is a reputational risk stemming from the limited capacity of national and the local Assemblies to manage E&S risks effectively. Although the ESSA identifies gaps and proposes mitigation measures, their successful implementation relies on implementation entities such as the SIF, YEA, NEIP and the relevant Districts/Municipal Assemblies. If these institutions do not properly screen, monitor, and address environmental and social risks, particularly in subprojects involving infrastructure or community engagement, the Bank may be associated with environmental harm or poor labour and social practices. This could harm the Bank's image as a promoter of responsible development.

5.2 Risk of Exacerbating Local Conflicts

The Programme's operations in Northern Ghana, a region characterized by fragile peace, chieftaincy disputes, and ethnic tensions, introduce a reputational risk if project interventions inadvertently worsen local conflicts. For instance, perceptions of bias in the allocation of resources or employment opportunities could reinforce grievances among ethnic groups or lead to elite capture. Without strong conflict sensitivity and equitable stakeholder engagement, the Bank could be seen as enabling divisive dynamics, which would contradict the Programme's goal of promoting social cohesion and could tarnish the Bank's reputation in conflict-sensitive programming.

5.3 Unrealized Gender Equity Outcomes

The Programme's commitment to ensuring 50% female participation in training and MSME development is ambitious and commendable. However, in conservative settings, especially in Northern Ghana, socio-cultural barriers may limit women's access, voice, and leadership in economic activities. If the Programme fails to translate gender targets into meaningful outcomes, such as women's economic empowerment or increased agency, it risks being criticized for

superficial inclusion. This could lead to reputational damage for the Bank as a champion of gender-responsive development.



5.4 Inadequate Grievance Redress and Stakeholder Engagement

There is a risk that communities and stakeholders may feel excluded or unheard, especially in an RBF model where performance pressures could overshadow inclusive engagement. If grievances associated with the Program, exclusion, or misuse of funds are not effectively addressed due to weak or inaccessible grievance mechanisms, the Bank could face negative publicity or civil society backlash. Public perception of the Bank's involvement in a Programme that fails to uphold transparency and accountability could significantly affect its credibility.

SECTION 6: PROGRAMME MONITORING AND IMPLEMENTATION SUPPORT



6.0 PROGRAMME MONITORING AND IMPLEMENTATION SUPPORT

Effective monitoring and implementation support are critical to the success of the GWYESCO Programme, particularly given its RBF modality. This chapter outlines the mechanisms and institutional arrangements for monitoring E&S performance throughout Programme implementation. It also highlights the roles of implementing entities and the support measures needed to ensure that environmental and social safeguards are effectively integrated, tracked, and continuously improved in line with the Bank's ISS.

6.1 Monitoring Framework

Monitoring under the GWYESCO Programme will be results-oriented, focusing on the achievement of DLIs and the implementation of agreed Environmental and Social Action Plans (ESAPs). The framework will include:

- **Performance Indicators:** E&S indicators aligned with the Programme's development objectives, including gender participation rates, grievance redress resolution rates, occupational health and safety (OHS) incidents, and environmental compliance milestones.
- **Reporting Requirements:** Implementing agencies will submit periodic progress reports (quarterly and annually) with dedicated sections on safeguards compliance. These reports will inform disbursement decisions and Programme reviews.
- **Verification Mechanism:** The Independent Verification Agent (IVA) will include E&S performance metrics as part of its verification protocol. The ESSA recommends training the IVA team on safeguards aspects to ensure robust verification.

6.2 Institutional Roles and Responsibilities

The following institutions will be key to monitoring and implementation support:

- **Social Investment Fund (SIF):** As the lead implementing agency, SIF will be responsible for consolidating E&S performance reports from all partner institutions. SIF will also coordinate capacity building activities and ensure safeguards-related data is collected, analyzed, and used for adaptive management.
- **Youth Employment Agency (YEA), GRATIS Foundation, NEIP, and ARB Apex Bank:** These institutions will oversee the implementation of E&S actions within their respective mandates. They will designate focal points to coordinate with SIF and submit periodic safeguards reports.
- **AfDB Supervision Missions:** The Bank will undertake regular implementation support missions to review compliance with safeguards requirements, assess progress on the strengthening action plan, and provide technical guidance.



6.3 Capacity Support Measures

The ESSA identified capacity gaps, particularly the absence of dedicated E&S staff and limited experience with RBF safeguards reporting. To address these, the following support measures will be implemented:

- Recruitment of E&S officers at SIF and key partner institutions.
- Training on the African Development Bank's ISS and RBF procedures.
- Development of simple monitoring tools and templates to facilitate data collection.
- Establishment of a centralized E&S data management system.
- Technical assistance to integrate safeguards into MIS and reporting systems.

6.4 Grievance Redress and Feedback Mechanisms

Monitoring will include tracking the functionality of grievance redress mechanisms (GRMs). Indicators will assess the number and type of complaints received, resolution timelines, and stakeholder satisfaction. The feedback generated will be used to strengthen risk mitigation and ensure continuous learning.

6.5 Risk-Based Supervision Approach

A risk-based supervision approach will be adopted to prioritize support to higher-risk components and activities. This includes intensified monitoring in areas with known social tensions, vulnerable groups, or environmentally sensitive locations. Remote tools such as mobile-based surveys and virtual field checks may complement site visits

6.6 Adaptive Management and Learning

Lessons from monitoring and implementation support will feed into ongoing improvements in safeguards systems. Annual reviews will include reflections on challenges, good practices, and areas for adjustment. The implementation of the System Strengthening Action Plan will be a core focus in these reviews.



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APPENDICES

Appendix 1 Government Request for RBF Instrument



P.O.Box MB 40, Ministries, Accra
Digital Address : GA-144-2024

Kindly quote this number and date on
all correspondence

Our Ref: MOF/ADF/GWYESCO/01/25
Your Ref:

Date : 29th April, 2025

COUNTRY MANAGER
AFRICAN DEVELOPMENT BANK GROUP
NO. 1 RANGOON LANE
CANTONMENTS-ACCRA

FUNDING REQUEST FOR THE GHANA WOMEN AND YOUTH EMPLOYMENT AND SOCIAL COHESION PROJECT (GWYESCO) THROUGH THE RESULTS-BASED FINANCING (RBF) INSTRUMENT

We write to formally communicate the Government's decision to implement the Ghana Women and Youth Employment and Social Cohesion Project (GWYESCO) using the African Development Bank's **Results-Based Financing (RBF)** instrument. The total project amount is UA 52.24 million (approximately USD 68.9 million), comprising UA 37.24 million under the ADF-16 allocation and UA15 million from the Transitional Support Facility Pillar I – Prevention Envelope.

2. GWYESCO aims to promote inclusive economic growth through job creation, entrepreneurship, and skills development, particularly targeting women and youth. The programme further focuses on three (3) key outcome areas: (i) Skills development for employability and job creation; (ii) Access to finance and markets; and (iii) Institutional capacity building and policy reforms. These objectives align with national priority programmes outlined in the 2025 Budget and Economic Policy Statement, including the National Apprenticeship Programme, the Women's Development Bank, the Adwumawura Programme, and the Big Push initiative.

3. This request follows the constructive engagement between the Ministry of Finance and the African Development Bank during the meeting held on 7th April 2025, which set the tone for exploring the RBF approach for GWYESCO. The confirmation of this direction during the subsequent meeting on 28th April, 2025 further strengthens our confidence in moving forward with the RBF mechanism.

4. It would be greatly appreciated if the Bank could consider and offer support by fielding an appraisal mission to conduct detailed assessment for the project through RBF.

5. We thank you for your continued partnership and look forward to your favourable response.


HON. THOMAS NYARKO AMPEM (MP)
DEPUTY MINISTER
For: MINISTER

cc: Hon. Minister, MOF
Chief Director, MOF
Coordinating Director, MOF
Country Prog. Officer, COGH, AfDB
Head, AfDB Unit, MOF
Task Manager, GWYESCO, AfDB

Tel: +233 (0) 302 747 197
Email : info@mofep.gov.gh
Website : www.mofep.gov.gh

Appendix 2 Consolidated Programme Expenditure Framework



DLI Name	Total Grant amount (USD)	Gov't Budget total (GHS) - 2025-2028	Gov't Budget total (USD)	RBF Timelines				RBF allocation 2027 (USD)	Budget Forecast 2027 (GHS)	RBF allocation 2028 (USD)	Budget Forecast 2028 (GHS)	Budget lines reference
				RBF amount 2025 (USD) - 25% Advance	Budget Forecast 2025 (GHS)	RBF Amount 2026 (USD)	Budget Forecast 2026 (GHS)					
AfDB 25% Advance				16,025,000								
Number of women and youth in wage or self-employment (cumulative)	3,600,000	4,747,510,829	460,923,381		1,625,781,869	1,200,000	719,400,000	1,200,000	956,892,000	1,200,000	1,445,436,960	The Budget Statement and Economic Policy of the Government of Ghana for the 2025 Financial Year
Number of Women and Youth who acquired STEM, Digital and Creative Industry skills	30,000,000	2,513,504,640	244,029,577		590,000,000	7,500,000	499,800,000	10,714,285.7	657,300,000	11,785,714.3	766,404,640	The Budget Statement and Economic Policy of the Government of Ghana for the 2025 Financial Year
Number of women and youth owned MSMEs capacitated with business development services training (cumulative)	10,000,000	1,636,296,300	158,863,718		410,000,000	3,000,000	303,000,000	3,500,000	402,468,000	3,500,000	520,828,300	The Budget Statement and Economic Policy of the Government of Ghana for the 2025 Financial Year
Number of women and youth owned MSMEs with access to finance	15,000,000	302,838,266	29,401,773		51,268,180	3,750,000	64,597,906	5,625,000	86,561,194	5,625,000	100,410,986	The Budget Statement and Economic Policy of the Government of Ghana for the 2025 Financial Year
Number of institutions whose capacity and integrated risk mitigation systems have been strengthened	6,500,000	17,435,000	1,692,718		4,358,750	2,000,000	4,358,750	3,000,000	4,358,750	1,500,000	4,358,750	The Budget Statement and Economic Policy of the Government of Ghana for the 2025 Financial Year
Management and Coordination - Coordinating Agency (Sourced from AfDB financing)	3,800,000			1,200,000.00		1,000,000.00		800,000.00		800,000.00		

DLI Name	Total Grant amount (USD)	Gov't Budget total (GHS) - 2025-2028	Gov't Budget total (USD)	RBF Timelines								
				RBF amount 2025 (USD) - 25% Advance	Budget Forecast 2025 (GHS)	RBF Amount 2026 (USD)	Budget Forecast 2026 (GHS)	RBF allocation 2027 (USD)	Budget Forecast 2027 (GHS)	RBF allocation 2028 (USD)	Budget Forecast 2028 (GHS)	Budget lines reference
Total	68,900,000	9,217,585,035	894,911,168	17,225,000	2,681,408,799	18,450,000	1,591,156,656	24,839,285.70	2,107,579,944	24,410,714.30	2,837,439,636	
NB: - (25% advance of total RBF allocation in 2025 covers cost reimbursable to GoG for pre-payments in FY25) The 25% will reduce RBF allocations/drawdown for ensuing years.												
1.2m usd for Management and Coordination for FY2025 will be drawn from the 25% advance, the equivalent of USD 17,225,000.												



ENVIRONMENTAL PROTECTION AGENCY



ENVIRONMENTAL ASSESSMENT REGISTRATION FORM

(To be completed in Duplicate)

FEE GHC

FORM EA 1

Proponent: _____

Address for correspondence _____

Contact person _____

Position _____

Phone No _____

Email _____

Environmental Protection Agency (Head Office)

P.O. Box M 326

Accra, Ghana

Tel: 0302 664697/8, 0302 663499, 0302 662465

Email: info@epa.gov.gh

Website: www.epa.gov.gh

This form shall be submitted to the relevant EPA Regional, District and Zonal Offices. It is important that you read carefully the guide for completing the form before starting.



GUIDE FOR COMPLETING AN ENVIRONMENTAL ASSESSMENT REGISTRATION FORM

The Environmental Assessment Registration Form is designed to provide enough relevant information to enable the EPA to set an appropriate level of assessment for proposal referred to it. Failure to provide detailed information in a comprehensive manner may delay the assessment process. It is not expected that this form will be appropriate for all purposes and, depending on your proposal, a lengthier document may be necessary in addition to this form.

PROPOSAL

A simple, brief description of the proposal or proposed undertaking is required and must include: input processes, end results, outputs, quantities and timing. Please include flow diagram if available.

LOCATION

A site/block plan is essential.

It should indicate the geographical coordinates of site (Longitude and Latitude), evaluation and slope of the site, any nearby areas or features of environmental significance (e.g. proposed or declared reserves, water courses, wetlands) and adjacent land uses, including the nearest homes or areas zoned residential.

SERVICES

Details of water supply, storm water drainage, power corridors, access to and impact on roads and transport can all be significant and should be noted where relevant.

ENVIRONMENTAL IMPACT

Criteria for assessing a project and setting a level of assessment are:

1. The character of the environment
2. The potential impact of the proposal
3. Resilience of the environment to cope with change
4. environmental impacts
5. The input of other statutory decision-making bodies
6. Degree of public interest.

The following potential environmental impacts may be relevant:

1. Impacts on geomorphology, land stability and landscape
2. Impacts on drainage and water quality (surface and ground)
3. Impacts on biota
4. Impacts on access and transport systems
5. Impacts on existing services including power, water and telephone
6. Impacts on existing community facilities
7. Impacts on existing contingency plans for safety and emergency services.
8. Impacts on emission (Gas, Dust, Noise and heat)



9. Management of solid and liquid waste and storm water
10. Impacts on adjacent land uses including any conservation and recreational aspects
11. Impacts of constructional and operational activities
12. Visual impacts
13. Social impacts

Proponents would be required to pay appropriate processing and permit fees in accordance with the current existing LI for fees and charges (Amendment) Instruments.

1. PROPOSED UNDERTAKING/DEVELOPMENT

Title of proposal (general classification of undertaking)

Description of proposed undertaking including unit processes (flow diagram), raw materials, list of chemicals (source, types and quantities), storage facilities, waste by-products (soil, liquid and gaseous)

Scope of proposal (size of labor force, equipment and machinery, installed production capacity, product type, area covered by facility/proposal, market)



2. PROJECT SITE

(Location attach a site plan/map)

Plot/House No..... Street/Area Name.....

Town..... District..... Region.....

Major Landmarks (if any).....

Current Zoning.....

Distance to the nearest residential and or other facilities (in meters) provide coordinates (where possible)

.....

Adjacent land uses (existing and proposed) – (Describe in details and attach pictures)

.....

Site description (immediate activities and adjacent land uses should be described)

.....

3. INFRASTRUCTURE AND UTILITIES

Structures (building and other facilities proposed or existing on site)

.....

Access to water (source, quantity)

.....

Access to power (type, source and quantity)

.....

Draining provision in the project area

.....

.....

Nearness to water body

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100 101 102 103 104 105 106 107 108 109 110 111 112 113 114 115 116 117 118 119 120 121 122 123 124 125 126 127 128 129 130 131 132 133 134 135 136 137 138 139 140 141 142 143 144 145 146 147 148 149 150 151 152 153 154 155 156 157 158 159 160 161 162 163 164 165 166 167 168 169 170 171 172 173 174 175 176 177 178 179 180 181 182 183 184 185 186 187 188 189 190 191 192 193 194 195 196 197 198 199 200 201 202 203 204 205 206 207 208 209 210 211 212 213 214 215 216 217 218 219 220 221 222 223 224 225 226 227 228 229 230 231 232 233 234 235 236 237 238 239 240 241 242 243 244 245 246 247 248 249 250 251 252 253 254 255 256 257 258 259 260 261 262 263 264 265 266 267 268 269 270 271 272 273 274 275 276 277 278 279 280 281 282 283 284 285 286 287 288 289 290 291 292 293 294 295 296 297 298 299 300 301 302 303 304 305 306 307 308 309 310 311 312 313 314 315 316 317 318 319 320 321 322 323 324 325 326 327 328 329 330 331 332 333 334 335 336 337 338 339 340 341 342 343 344 345 346 347 348 349 350 351 352 353 354 355 356 357 358 359 360 361 362 363 364 365 366 367 368 369 370 371 372 373 374 375 376 377 378 379 380 381 382 383 384 385 386 387 388 389 390 391 392 393 394 395 396 397 398 399 400 401 402 403 404 405 406 407 408 409 410 411 412 413 414 415 416 417 418 419 420 421 422 423 424 425 426 427 428 429 430 431 432 433 434 435 436 437 438 439 440 441 442 443 444 445 446 447 448 449 450 451 452 453 454 455 456 457 458 459 460 461 462 463 464 465 466 467 468 469 470 471 472 473 474 475 476 477 478 479 480 481 482 483 484 485 486 487 488 489 490 491 492 493 494 495 496 497 498 499 500 501 502 503 504 505 506 507 508 509 510 511 512 513 514 515 516 517 518 519 520 521 522 523 524 525 526 527 528 529 530 531 532 533 534 535 536 537 538 539 540 541 542 543 544 545 546 547 548 549 550 551 552 553 554 555 556 557 558 559 560 561 562 563 564 565 566 567 568 569 570 571 572 573 574 575 576 577 578 579 580 581 582 583 584 585 586 587 588 589 590 591 592 593 594 595 596 597 598 599 600 601 602 603 604 605 606 607 608 609 610 611 612 613 614 615 616 617 618 619 620 621 622 623 624 625 626 627 628 629 630 631 632 633 634 635 636 637 638 639 640 641 642 643 644 645 646 647 648 649 650 651 652 653 654 655 656 657 658 659 660 661 662 663 664 665 666 667 668 669 670 671 672 673 674 675 676 677 678 679 680 681 682 683 684 685 686 687 688 689 690 691 692 693 694 695 696 697 698 699 700 701 702 703 704 705 706 707 708 709 710 711 712 713 714 715 716 717 718 719 720 721 722 723 724 725 726 727 728 729 730 731 732 733 734 735 736 737 738 739 740 741 742 743 744 745 746 747 748 749 750 751 752 753 754 755 756 757 758 759 760 761 762 763 764 765 766 767 768 769 770 771 772 773 774 775 776 777 778 779 780 781 782 783 784 785 786 787 788 789 790 791 792 793 794 795 796 797 798 799 800 801 802 803 804 805 806 807 808 809 810 811 812 813 814 815 816 817 818 819 820 821 822 823 824 825 826 827 828 829 830 831 832 833 834 835 836 837 838 839 840 841 842 843 844 845 846 847 848 849 850 851 852 853 854 855 856 857 858 859 860 861 862 863 864 865 866 867 868 869 870 871 872 873 874 875 876 877 878 879 880 881 882 883 884 885 886 887 888 889 890 891 892 893 894 895 896 897 898 899 900 901 902 903 904 905 906 907 908 909 910 911 912 913 914 915 916 917 918 919 920 921 922 923 924 925 926 927 928 929 930 931 932 933 934 935 936 937 938 939 940 941 942 943 944 945 946 947 948 949 950 951 952 953 954 955 956 957 958 959 960 961 962 963 964 965 966 967 968 969 970 971 972 973 974 975 976 977 978 979 980 981 982 983 984 985 986 987 988 989 990 991 992 993 994 995 996 997 998 999 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011 1012 1013 1014 1015 1016 1017 1018 1019 1020 1021 1022 1023 1024 1025 1026 1027 1028 1029 1030 1031 1032 1033 1034 1035 1036 1037 1038 1039 104

Access road to project site

The figure consists of two horizontal bar charts. The top chart is titled 'Random numbers' and the bottom chart is titled 'Random numbers squared'. Both charts have a y-axis with 1000 tick marks, representing the frequency of each number. The x-axis represents the values of the random numbers. The 'Random numbers' chart shows a distribution that is roughly uniform, with a slight skew to the right. The 'Random numbers squared' chart shows a distribution that is more skewed to the right, with a higher frequency of values near zero and a lower frequency of values near 1000.

Other major utilities proposed or existing on site (eg. sewerage, etc)

4. ENVIRONMENTAL IMPACTS

Potential environmental impacts of proposed undertaking (both constructional and operational phases)

[illegible]



7. ATTACHMENTS

Tick appropriate box indicating that the following required documents have been attached.

- ☐ Authentic site plan (signed by a licensed surveyor and certified by survey dept.)
- ☐ Block plan of the site
- ☐ Photographs of the site
- ☐ Zoning letter from Town and Country Planning Department (TCPD)
- ☐ No objection letter from the National Petroleum Authority (NPA) (For Petroleum Products retail outlets (FSS & LPG))

8. DECLARATIONS

I,hereby declare that the information provided on this form is true to the best of my knowledge and shall provide any additional information that shall come to my notice in the course of processing the application. I also declare that the information provided is true.

.....

.....
Signature

.....
Date

Use additional sheets where the spaces provided are inadequate.



Appendix 4 Stakeholder Engagement Schedule

Date	Stakeholder	Engagement Tool/Venue	Person(s) Engaged	Position/Job Title
12/05/2025	Environmental Protection Authority	In Person	Andriana Nelson	Director – Environmental Assessment Division
19/05/2025	Social Investment Fund	Virtual	John Armah	Technical Advisor
			Macdonald Acquah	Monitoring and Evaluation Officer
15/05/2025	Youth Employment Agency	In Person	Malick Basintale and others	CEO with his Technical team
19/05/2025	National Entrepreneurship and Innovation Programme	Virtual	Andrew Agyemang	Financial Director
20/05/2025	GRATIS\ Foundation	Virtual	Alfred Kanda	General Manager, Technical
			Raymond Owusu	Technology Transfer Manager
			Patrick Quansah	General Manager, Engineering
26/05/2025	ARB Apex Bank	Virtual	Godorn Peter Derry	Head, Business Development and Credit
12/06/2025	National Alternative Employment & Livelihood Programme	Virtual	Frank Asare	CEO, NAELP

APPENDIX 5: VALIDATION WORKSHOP

Name	Institution	Designation
Baba Kankani Gariba	NEIP	Director. M&E
John Nii Armah	SIF	Technical Advisor
Rosemary Naa Kai Afotey-Lord	SIF	CEO's Secretariate

Prince Odeneho	GRATIS	
Raymond Owusu	Gratis	
Frank Asare	NAELP	CEO
Nicholas Kwadwo		
Abigail Agyemang	Ministry of Finance	AfDB unit
Afriyie Owusu	Technical Officer	Technical Officer
Vincent Ampem Darko	NAELP	Head of Finance



WhatsApp Web interface showing a group chat titled "THE SOCIAL INVESTMENT FUND OF GHANA". The chat includes a grid of participant avatars with initials (FA, RO, B, JA, ND, A, BG, SA) and names. A chat log on the right shows messages from participants like Benjamin Shumfied, Rosemary Naa Kai Aducci, and Nicholas Kwadwo Dusu. The interface also displays a status bar at the top and a bottom navigation bar with icons for chat, people, voice, react, view, home, and more.