



Report Number : ICRR0021446

1. Project Data

Project ID P120636	Project Name GH-Land Administration - 2		
Country Ghana	Practice Area(Lead) Social, Urban, Rural and Resilience Global Practice	Additional Financing P166907,P166907	
L/C/TF Number(s) IDA-48700,TF-14256	Closing Date (Original) 31-Mar-2016	Total Project Cost (USD) 49,296,023.50	
Bank Approval Date 31-Mar-2011	Closing Date (Actual) 31-Jan-2019		
		IBRD/IDA (USD)	Grants (USD)
Original Commitment		50,000,000.00	2,879,706.49
Revised Commitment		52,500,919.13	2,500,919.13
Actual		49,296,023.50	2,500,919.13
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2. Project Objectives and Components

a. Objectives

According to the legal agreement of 2011, the objective of the Ghana Land Administration Project was “to support the Recipient’s efforts to consolidate and strengthen land administration and management systems for efficiency and transparent land service delivery” (Loan Agreement TF-48700, 2011, p. 5). This is the same objective that was described in the Project Appraisal Document (PAD) (PAD, p. viii). While the project experienced a restructuring in April 2015, the objective was not changed, and it remained the same throughout the life of the project.



The Implementation Completion and Results Report (ICR), and subsequently this review, covers the period from August 2011 to approximately January 2019. While the project is scheduled to close in March 2019, the ICR was prepared following a request from the Government of Ghana for additional financing (ICR, para. 1).

b. Were the project objectives/key associated outcome targets revised during implementation?

Yes

Did the Board approve the revised objectives/key associated outcome targets?

c. Will a split evaluation be undertaken?

No

d. Components

Component 1: Strengthening the Policy, Legal and Regulatory Framework for Land Administration.

(Total appraisal cost was estimated at US\$5 million, and IDA was to provide US\$3.85 million of these. At closing the total cost was US\$3.48 million). This component sought to support the legal and regulatory framework for governing land administration and land use, including the completion of both the Land Bill and the Land Use and Planning Bill. Legal experts would be recruited to complete legal reforms, disseminate key information about the new laws and regulations, and train key stakeholders. Additional activities to support the (i) improvement of court performance, (i) record keeping, and (iii) strengthening capacities of alternative dispute resolution and mediation practices in the resolution of land use conflicts (PAD, para. 24) were also included under this component. The component also aimed to support the development and completion of key studies and policy development (PAD, para. 25).

Component 2: Decentralization and Improving Business and Service Delivery Processes. (Total appraisal cost was estimated at US\$23.27million, and IDA was to provide US\$17.28 million of these. At closing the total cost was US\$13.36 million). This component aimed at improving the transparency and reduce the time and cost involved in delivery of services, such as deed and title registration and other services provided by land sector agencies (PAD, para. 26). The component aimed at financing the decentralization of services to regions and selected districts. It also sought to support Customary Land Secretariats (CLS) and traditional authorities to establish minimum norms of transparency, respect for rights and quality control in the generation of documentation, management of records, and provision of services (PAD, para. 26). The component also sought to support an automated and proper record management system (PAD, para. 27).

Component 3: Improved Maps and Spatial Data for Land Administration. (Total appraisal cost was estimated at US\$31.51 million, and IDA was to provide US\$20.57 million of these. At closing the total cost was US\$12.20 million). This component sought to update maps, and develop the infrastructure to collect and share data and information as it related to land administration. Key activities for supporting this component included: (i) developing key policies for mapping and special activities, (ii) preparation of base



maps, (iii) establishing a geodetic reference network, (iv) pilot boundary demarcation for customary and private landholders, (v) preparation of land use plans (vi) revaluation of properties in selected district capitals, and (vii) a 'street addressing system' for urban management and improved revenue collection starting in Accra (PAD, para. 28).

Component 4: Human Resource Development and Project Management. (Total appraisal cost was estimated at US\$10.78 million, and IDA was to provide US\$8.30 million of these. At closing the total cost was US\$17.75 million). This component aimed at developing the human resource capacity and provide logistical support to the land sector agencies. Key activities aimed at improving customary and service orientation of key land sector agencies. Capacity strengthening would also be provided to surveyors, planners, valuers, real estate agents, tenant farmers, and NGOs (PAD, para. 29).

e. Comments on Project Cost, Financing, Borrower Contribution, and Dates

Project Cost. At appraisal, the total cost of the project was estimated at US\$ 72 million (PAD, pg. viii), of which US\$50 million would be contributed by the World Bank and US\$15 million by the Canadian government (PAD, viii). At closing, the total project cost was US\$ 46.79 million (ICR, pg. 46).

Financing. A US\$50 million financing was provided through an Investment Project Financing (IDA-48700).

At appraisal, the project expected the Canadian government to contribute US\$15 million. After the project was approved, the government of Canada provided financing in the amount of US\$ 2,879,706 (TF-14256). This CIDA Trust Fund was later revised to US\$ 2,500,919 (ICR, pg. 2)

The total revised financing for this project, including the World Bank and Canadian allocations, was US\$ 52,500,919 (ICR, pg. 2).

The actual disbursement at the end of the project was US\$ 49,296,024 (US\$46,795,104 from IDA-48700 and US\$2.5 from TF-14256) (ICR, pg. 2).

Borrower Contribution. The PAD states that the Borrower would contribute US\$5 million towards the project (PAD, pg. vii). The borrower's contribution to the program was expected to be US\$1.2 million during implementation. (ICR, pg. 10).

The users of the program were also expected to contribute a total of US\$2 million (PAD, p. vii).

At the end of the project, neither the borrower nor the users had contributed towards the project (ICR, pg. 2 and pg. 10).

Dates. The project was approved on March 31st, 2011 and became effective on August 8th, 2011. It



underwent a midterm review on June 02, 2014. The original closing date was March 31st, 2016 and the actual closing date was January 31st, 2019. The project was extended a total of 34 months.

The CIDA Trust Fund was extended twice, first on April 30, 2013, for 12 months. The second time it was extended was in April 30th, 2014 for an additional 12-month fund extension until April 30th, 2015 (World Bank Staff Interview, December 2018).

In March 2015 a Level II Restructuring was conducted. Project changes included (i) results framework, (ii) reallocation of credit proceeds in the disbursement table and (iii) extension of the closing date of the project to March 31, 2017 (ICR, para. 20). In February 2017, the project was once again extended for a 12-month duration. The closing date was moved to February 28th, 2018. In February 2018, the project was extended to the current end date of January 31st, 2019. In total, the project was extended 34 months.

The Government of Ghana is seeking additional financing with a final closing date of December 31, 2021.

3. Relevance of Objectives

Rationale

Country Context. At the time of appraisal, Ghana's economy relied heavily on the agriculture and mining sector. In 2011, more than 90 percent of exports came from land (PAD, para 2). Land sector issues, especially difficulties in accessing land and insecurity of land tenure, hampered investments and economic growth (PAD, para 3). At the time of appraisal, Ghana was experiencing a growing demand for land due to the expansion of urbanization, growing population and diminishing supply of land. Weak statutory land delivery systems, including traditional systems to administer land under customary tenure, were not delivering appropriate services. This led to an inflationary increase in the price of land and property (PAD, para. 4). The land delivery system also lacked transparency (PAD, para. 4). Overall Ghana's mainland sector issues were (i) an inadequate policy and legal framework, (ii) fragmented institutional arrangements and weak institutional capacity, (iii) an underdeveloped land registration system, (iv) a weak land administration system, and (v) past compulsory acquisitions by the government (PAD, para. 110).

The Government of Ghana showed commitment to addressing some of these land sector issues and recognized the role of the land sector in the Ghana Shared Growth and Development Agenda (GSGDA) 2010. This document identified land as a valuable economic and social resource, and a key natural resource to propel Ghana towards middle-income status in 2020 (PAD, para. 3).

Previous Sector Experience. The Government of Ghana, with support from the World Bank's Land Administration Project (LAP 1 - 1999-2001), sought to address some of the institutional challenges to land issues. The LAP 1 project was designed as an Adaptable Program Loan with 15 to 25 years perspective. However, as the project was being prepared it changed from an Adaptable Program Loan (APL) to a Specific Investment Loan (SIL) (PAD, para. 13). LAP 1 was restructured in 2008, and extended for two additional



years (PAD, para. 14). The current project, LAP 2 was created to consolidate and complete the reforms started in LAP1 (PAD, para. 16).

As a result, the objective of the project aimed to not only address structural land sector issues but also to continue to consolidate and strengthen ongoing reforms triggered by LAP1. Unfortunately, lessons learned from LAP1 were either not available or not incorporated when designing LAP2 (ICR, para. 74). As a result, “many of the same mistakes were made in preparing LAP2 – particularly regarding the complexity and realism of the expected results” (ICR, para. 74). Other lessons related to M&E were not incorporated either (ICR, para. 74).

Alignment with Strategy. The objective of LAP2 aligned with the Country Assessment Strategy (CAS) 2008-2011. In particular, the objective supported Pillar 1 of the CPS Private Sector Competitiveness. This pillar’s strategic priority included improving access to land and security of property rights (CAS, pg 6-8). The objective also contributed to The World Bank’s Country Partnership Strategy (CPS FY13-FY16, which was extended to 2018). The objective supported the strategy’s first pillar: Improving Economic Institutions, in particular, outcomes related to Enhancing Natural Resources Governance and Strengthening Land Administration (CPS, para. 51).

Development Problem. Ultimately, the project and the objective sought to improve business development and economic growth by strengthening land administration and management systems for efficiency and transparent land service delivery. If the project was successful at meeting its objective, the appraisal documents anticipated that there would be (i) improved confidence among investors, (ii) greater security of tenure to all users and occupiers of land, and (iii) more secure tenancy agreements for the use of land and property (PAD, para. 6). The ICR’s retroactive theory of change also indicated that long-term outcomes would lead to specific private sector investment opportunities, increased number of transactions and increased revenue from transaction taxes and property taxes (ICR, pg. 6). All of these outcomes would lead to the public investing more in land and businesses, and government agencies and city authorities having increased revenue while providing improved land services (ICR, pg. 6). While the development problem aligns with Ghana’s CAS and CPS, the project design failed to sufficiently include specific aspects of the development problem into the objective and thus, there was a lack of clarity as to the specific issues the project’s theory of change needed to address. Without such clarity, it is difficult to conceive how the various challenges limited confidence, confined security of tenure and/or prevented efficient land use.

Therefore, while the project’s objective was designed based on the country context and addressed a critical development problem that would ultimately lead to increased business development and economic growth, there were moderate shortcomings. The objective was fully aligned with the Country Assessment Strategy (2008-2011) and contributed to the Country Partnership Strategy (2013-2011), but the project did not fully incorporate the lessons from LAP1 and thus did not sufficiently capture the intended transformation required to improve land issues in Ghana. As a result, the objective’s relevance is rated as substantial.

Rating
Substantial



4. Achievement of Objectives (Efficacy)

Objective 1

Objective

To consolidate and strengthen land administration and management systems for efficiency and transparent land service delivery.

Rationale

Since land administration and land management activities are so closely interconnected, this ICR Review will treat these as aspects of the same objective, and will thus not parse the objective into two sub-objectives. Instead, this ICR Review will group together key activities that supported (i) consolidation and strengthening of land administration and land management, (ii) efficiency, and (iii) transparency.

The objective of the project aimed at consolidating and strengthening the achievements and work that had begun in LAP 1, in particular, two inter-related aspects: land administration and land management. The PAD broadly defined land administration systems as the “core functions of regulating land property development, land use controls, and land taxation and disputes” (PAD, pg. 23). The ICR added that land administration is the way in which the rules of land tenure are applied and made operational. It includes formal or informal systems and processes to administer land (ICR, pg. 74). Land administration can be divided into four components: judicial, regulatory, fiscal, and information management (ICR, pg. 74). Complementarily, land management, as defined in the ICR, is the process of managing the use and development of land resources. Land resources may include housing, agriculture, reforestation, water resource management, infrastructure, and eco-tourism (ICR, pg. 74). In other words, land administration and land management mutually reinforce one another.

The theory of change underpinning this objective was that if key components of land administration (policies, laws, registration of deeds and titles, national and regional strategic development plans, and court performance) and land management (boundary demarcation, improved land procedures, development of maps, and improved capacity) were strengthened, then institutions (Land Use and Spatial Planning Authority, Judicial system, Customary land secretariats) would have adequate resources (software, human capacity, maps) to be more efficient and transparent. The outcomes of the project were meant to improve business development and economic growth by increasing public investment in land and businesses, and also increasing the revenue of government agencies and city authorities while providing improved land services delivery (ICR, pg. 6).

The objective was, however, not adequately linked to higher level impact. Moreover, the results framework did not include any indicator to measure contributions towards the implicit and higher level PDO of improving business development and economic growth.

The project’s theory of change is supported by three activity areas. The first activity area inputs were related to land administration including completing land bills, improving land management efficiency and capacity, and improving court performance. The activities’ outputs were meant to ensure that bills were passed,



national and regional strategic development plans were developed and approved, and court renovations and procedures improved. The outcome of these activities was to establish a New Land Use and Spatial Planning Authority and resolve court cases more quickly.

The second activity area included improved land management efficiency and capacity. The key outputs were to complete rural boundary demarcation pilots and establish Client Service Assess Units (CSAU) units. The outcome of these activities was meant to establish Customary Land secretariats supporting local services and improved software to increase transparency of services. The ultimate outcome was to increase the number of transactions and decrease the turnaround time of transactions. This was supposed to increase trust and transparency. This results chain had a few gaps. For example, for customary land secretariats to be effective, they need more support than land administration efficiency and capacity strengthening. While not noted in the theory of change outlined in the ICR, this activity stream included a media component to ensure that the public would be aware of the services. However, media outreach activities were not prominent in the ICR's theory of change and there were no indicators to measure the outreach activities and the public's increased trust. The results framework did not include any indicators to measure the quality of service delivery.

The third activity area included developing a geodetic network, with new maps and address systems. The production of new maps and street addressing (both the input and the output) was supposed to provide government agencies with detailed information about land ownership (outcome) for decision-making. This results chain assumes that by creating the maps, the government agencies will actually use the information. There were no indicators to measure use or utility of maps for decision-making. There were no indicators to measure capacity strengthening.

While the PAD outlines seven outcome areas that the project must complete, the results frameworks focused primarily on proxy indicators related to the efficiency of registration of deeds and titles registration. Transparency was only measured by whether information on the land administration and land management changes was made publicly available. This is not only an output indicator, but it is also a very limited definition of transparency. The PAD's results framework or indicators failed to adequately define consolidation and strengthening. There were no significant indicators to measure achievement or outcome of strengthening policy, legal or regulatory framework. Moreover, as the ICR notes, the results framework was not in line with the theory of change and was poorly designed (ICR, para. 8). While the intermediate indicators provided insight into the activities that were conducted, they did not necessarily describe the outcome or quality of such activities. Moreover, as the ICR reflected that "the intermediate indicators are all output-based...and these do not inform whether there is an impact on the expected beneficiary or whether the PDO was met" (ICR, para.35).

Land Administration and Land Management

Key Outputs

Key Outputs supported consolidation and strengthening of land administration and land management:



- 5,792 individuals working in the land administration were part of training programs (31% of participants were female). The target here was “120”, (ICR, pg. 39), presumably referring to land administration units and not individuals. There was thus no target for individuals trained and no reporting on how many units were trained. Unclear whether the target was met.
- 76 civil society organizations were trained in gender equity, land rights and monitoring and evaluation, exceeding by far the target of 15. (ICR, pg. 41).
- 20 individuals took post-graduate studies (14 male and 16 female) (Target not provided) (ICR, para. 52).
- 127 judges and magistrates, and 236 other court officials were trained (No Target set, ICR, pg. 62).
- Dedicated land courts were increased from 6 to 12 (Target not set, ICR, pg. 62)
- Several studies were conducted as part of the project, including on topics related to land policies, land-related fees and taxes, pricing policies, state-occupied land, vulnerability, gender equity, customary land traditions, and laws in eight locations, policies for geodetic networks, spatial data and map projections, social and gender impact, and cost and charges to register land titles (Targets achieved, ICR, para 37).
- Orthophoto maps for two regions were produced, meeting the target of 2. (Target Met, Target: 2, ICR, pg. 35).
- Only one out of two production line maps were completed, not achieving the target of 2 production line maps. (ICR, para 53).
- 4,580 streets were identified and 3,782 were named, exceeding the target of 2,850 named (Target Met: Target: 2850, ICR, pg. 37).
- As part of a pilot to systematically demarcate and document rights to all parcels in rural communities, 3,856 parcels were surveyed (Target not achieved, Target: 5,118, ICR, pg. 65).
- 125,000 parcels containing 230,000 structures (homes, buildings, etc.) were identified and numbered, of which 82,000 parcels on the valuation roll (Target met, Target: 120,000 parcels, ICR, para.51 and pg. 71).
- Guidelines and manual for boundary demarcation and demarcation that includes dispute resolution using ADR processes completed as planned (Target Met, Target: 1 Guideline, ICR, pg. 70).
- Only one customary land area was chosen for demarcation. The project was, however, unable to complete the customary land demarcation, not achieving the original target of 10 nor the revised target of 1. (ICR, para. 54).

Outcomes:

The appraisal documents define that the project should seek to improve land tenure security and the associated investment incentives (PAD, para 45). It defines improved tenure security through the achievement of the following results:

- A clear, coherent and consistent set of land administration policies and laws,



- A more efficient and decentralized land administration system operating through Ghana in accordance with Government policy and compatible with cultural norms and practices responsive to the needs of people,
- An up to date, efficient land information system that supports sustainable land management and administration, including good land record management and transparent transaction in the land, and,
- A more efficient land market operating in both urban and rural areas (PAD, para. 22).

As a result of the project, Ghana achieved the outcome of strengthening its institutional foundation (policy, legal, and regulatory framework) for land administration. It achieved this outcome through the completion of several land administration policies and laws. For example, in 2016, the Land Use and Spatial Planning Act (Act 925) was passed (Target met). This Act established the Land Use and Spatial Planning Authority (LUPSA) (Target Met). This agency developed the National Spatial Development Framework and two regional Spatial Development Frameworks for Greater Accra and Ashanti Regions.

The National Spatial Development Framework and the two regional Spatial Development Frameworks for Greater Accra and Ashanti regions led to the establishment of a regional Spatial Planning Committee, which was responsible for implementing the regional plans (Target Met, Target 3 Frameworks, ICR, pg. 36). Overall, the new laws and frameworks consolidated a process of land management decentralization. A total of 70 district spatial planning committees (out of 216 districts) were established to implement the regional plan and start work on distinct and local plans.

The National Plan strengthened land management as it gave the direction of how land should be used and managed. The National Plan also focused on agriculture, energy supply, and waste treatment. According to the ICR, the national plan was one of the most substantial accomplishments of the project (ICR, para 40), as it is expected to guide Ghana's land development for years to come. The authority of the plan, LUPSA, created a simple website making key information available to the public, adding to the project's quest for transparency (ICR, para. 40).

While some bills have been passed, such as the Land Use and Spatial Planning Acts, other bills and policies were still pending. For example, the project prepared a Land Bill, which was agreed by the cabinet and gazette and was submitted to Parliament for Consideration on October 2017 (Target Met, ICR, pg. 32). A final draft of a legislative instrument for the Administration of Stool Lands Act and the Land Commission Act was also submitted to the Attorney General. Similarly, a total of 5 policies for national spatial data infrastructure, survey, and mapping and geodetic reference network were completed and submitted to Cabinet for approval (Target met, Target: 5, ICR, pg. 35). However, the policies have not yet been implemented and were needed for the overall improvement of land administration and management (ICR, pg. 68).

The project supported decentralization of service delivery to the regions. The project established 7 Client Service Access Units (CSAUs) (Target Met, Target: 7, ICR, pg. 32) and 51 Customary Land Secretariats (CLSs) (Target Met, Target: 50, ICR, pg. 33). Given that 80% of the land is customary land, it is a very important step forward to decentralization and improving access to service delivery. The CLSs included a



document management software that allowed the public to track the progress of their application. Their tasks were to help assist citizens, solve disputes, support leasing, and document preparation, and help register rights (ICR, para. 41). The CLSs support transparency by registering rights in a public registry, where anyone can see what rights have been registered and to whom. Nearly 70,000 leases or assignments have been recorded voluntarily (ICR, para. 42). At the beginning of the project 1,000 rights were registered by CLS and by the end of the project, this increased to 35,000 (ICR, para. 57).

Although there were no indicators in the results framework to assess the efficiency, quality, or transparency of service of the CSAUs or CLSs, the ICR illustrates the important role that CLSs played at improving transparency. An evaluation of the Customary Land Sector determined that 26% of those surveyed experienced land-related disputes. Out of those, 20% have taken their case to the CLS for settlement. Moreover, 1 in every 3 persons were more likely to report the dispute to the CLS than other sources of dispute resolution (ICR, para. 42). This evidence highlights that citizens were aware of the CLSs services and were willing to use those services to resolve their conflicts. Moreover, the ICR states that customary authorities outside of the project have sought to establish their own CLSs, thus further demonstrates demand (ICR, para. 45). To accommodate the expansion of the CLSs, manuals, and guidelines have been produced to guide the new CLSs (ICR, para. 45).

The project codified customary laws and procedures. The Office of the Administrator of Still Lands (OASL) oversaw the ascertainment of 8 customary laws or practices (Target not met, Target: 10 practices, ICR, pg. 32). As a result, customary rules and procedures were analyzed and documented (ICR, para. 42). About 80% of the land was customary land and the CLSs were assisting citizens by supporting leasing and document preparation, registering rights, and resolving disputes (ICR, para 41). Although not measured, the codification of customary land and procedures has the potential to resolve conflict more effectively and transparently.

A key benefit of the project, as outlined in the efficiency section of the PAD, was to improve better quality and cheap land information through the creation of geo-referenced land information, base maps, land use planning, and street addressing, and implementation and monitoring of infrastructure projects. There were no indicators to measure improved quality or cheap land information.

While there were no indicators to measure the use of the outputs or how they increased effectiveness or transparency, the ICR does include key examples of how land information outputs were used to guide key land developments. For example, the Regional Spatial Development Framework utilized maps that were produced under the project. The frameworks were used to guide several developments including the eastern section of the national rail network, central business district development, and the development of the West African Growth Corridor (ICR, para. 39). The orthophoto maps were also used for planning and street addressing work, as well as for dispute resolution related to land registration (ICR, pg. 69). Moreover, a Beneficiary survey concluded that 74% of surveyors had seen and utilized the orthophoto maps and 53% had stated that they had made their work easier and more productive (World Bank Interview, December 2018). While the orthophoto maps were used in some of the project activities, the line maps were of little use, according to the ICR (ICR, para. 53).



When it comes to the demarcation activities, there were no clear benefits (ICR, pg. 69). The piloting process for conducting customary land demarcation was unable to demonstrate a viable methodology to complete the task within a reasonable timeframe or cost. In fact, the one boundary demarcated process that was undertaken by the project revived a dormant conflict. The project's actions did not exacerbate or increase the conflict, it simply did not resolve it (World Bank Staff Interview, December 2018). There was no appetite to pursue a court case by either party involved, and as a result, both sides continued to avoid utilizing the disputed boundary (World Bank Staff Interview, December 2018). The ICR notes that for future demarcation projects, the benefits must outweigh the costs. The ICR also reflects, that demand-driven boundary demarcation that was paid by participants may be a more effective model (ICR, pg. 70).

The project identified streets and street names. While streets signs have been placed, numbers on buildings were not yet displayed (ICR, pg. 71). Furthermore, the project identified 125,000 parcels containing 230,000 structures (homes, buildings etc). The identification of more structures should lead to increased income for the government through property taxes (ICR, para. 51). The ICR reported, that this activity should double the number of properties taxed (ICR, pg. 71) Street signs and identification of parcels were expected to support planning and decision-making for key services, but no indicators measured this expected result.

Overall, the project has been successful at strengthening the institutional foundation for land administration and land management by introducing key legislature, policies, and frameworks. While some bills have been passed, such as the Land Use and Spatial Planning Acts, other bills and policies were pending. The project decentralized service delivery to regions by establishing one-stop shops for the public. While there were no indicators in the results framework to assess the efficiency, quality, or transparency of service of the CSAUs or CLSs, the ICR provided evidence that the public is aware of the CLS services and willing to use them, including related to dispute resolution and registering rights. The project also strengthened land administration by codifying customary laws and procedures. Although not measured, the codification of customary land and procedures has the potential to resolve conflict more effectively and transparently.

The project was able to produce key outputs, such as maps, street signs, identification of parcels, etc. The ICR presented evidence that the orthophoto maps have been used. The demarcation activity was not successful at achieving its desired results. Meanwhile, the process of identifying and naming streets has led to new signage. Identification of new parcels and structures has the promise, while costly, to lead to a potential increase of revenue for the government in the form of growing property tax revenue. Unfortunately, there were insufficient indicators to measure the use of land management outcomes, including revenue increase.

Efficiency

Key Outputs:

The following outputs supported the efficiency of land administration and management:



- Dedicated land courts was increased from 6 to 12. They included six dedicated Land Courts in Accra, three regional land courts in Sekondi, Kumasi, and Tamale, and one sub-regional Land Court in the port city of Tema (No Target Provided, ICR, para. 49).
- Office construction and renovation for the judicial system were conducted as part of this project, as targeted (ICR, para. 49).
- 645 judges and key staff (of which 127 were judges and magistrates, and 236 other court officials) were trained (No Target set, ICR, para 49 and pg. 62).
- 20 CSOs were trained in gender equity, roles and functions of CLS, and Alternative Dispute Resolution (No Target provided, World Bank Staff Interview, December 2018)
- The implementation of an automated system for Land Commission activities, Ghana Enterprise Land Information System (GELIS) was delayed (ICR, para. 47).
- A fully functional information system that is called LUPMIS was developed and was in daily use (ICR, para. 39 and World Bank Staff Interview, December 04).

Outcomes:

Efficiency was defined in the PAD and the results framework through the improved efficiency in the registration systems and service delivery,

Throughout the life of the project, there has been an increase in registered land transactions, including land rights. A total of 36,178 land rights were recorded locally at Customary Land Secretariats (CLS), with a baseline of 1,000 in September 2011 (Target Achieved, Target: 25,000, ICR, pg. 33). A total of 82,438 land transactions were registered throughout the life of the project (Target Exceeded, Baseline: 6,000, Target: 30,000, ICR, pg. 34). The project team estimated that 20% of applications were from female participants, although adequate data was not mainstreamed throughout the project (ICR, pg. 65).

The project's achievement in increasing efficiency by streamlining business processes was mixed. On the one hand, the project improved slightly the turnaround time in registering land deeds in selected areas. At the start of the project, it took 3 months to secure a land deed and by the end of the project it took on average 2.1 months (Target Not Met, Target: 1 month, ICR, pg. 29). The deeds turnaround varied between 5.5 months in Upper East Area to 0.7 months in the West (ICR, pg. 65). Lack of investment in the deeds register back offices and delays in rolling-out the GELIS system prevented further improvements in deed registration turn-around (ICR, pg. 29). According to the ICR, while improving deed registration is a good improvement, "it is not critical to the PDO because the transaction has already been completed by the time it is sent for registration." (ICR, pg. 74). The ICR reflected that the progress has been good, but it does not impact the beneficiary substantially (ICR, pg. 74).

The project was unable to achieve its target of clearing backlog of applications for title registration. The project cleared 62,633 out of the 79,472, roughly 80% (Target not met, ICR, pg. 33 and pg. 68). Moreover, a backlog between 2010 to 2018 grew with exact figures unknown (ICR, pg. 33). This is problematic given that it is the responsibility of the government to create a registry of properties and right-holders for the particular



property and ensure that it is accurate, authentic and reliable (ICR Annex 7, para. 8, pg. 74). The title registry is important to check that the documents are in order and to check that the transaction is valid (ICR, pg. 74). Moreover, in 2017, for example, only 38 out of the 2,652 applications for first registration were processed and only 61 out of 407 transfers of a whole property were processed (ICR, pg. 75). The ICR explained that few resources were put in place to reduce the backlog (ICR, pg. 68). The growing backlog and inability to process applications of first registrations showed inefficiency and lack of transparency in the process.

Similarly, the project was unable to achieve its target of decreasing turning around time in registering land titles (Target not met, Target not measured, ICR, pg. 29). The turnaround time for registering land titles, a PDO indicator, could not be measured due to unreliable baseline and subsequent reporting (Target Not Met, Baseline 7 months, Target: 3 months).

The project was also unable to use the Land Information System (LIS) that was piloted under LAP1. This system was supposed to help with the efficiency of the land administration system at the deeds and land registry (ICR, pg. 65). As a result, a new system had to be developed. The GELIS (Ghana Enterprise Land Information System) was developed and tested, but not implemented (ICR, pg. 65). The delayed implementation impeded the efficiency of the deed and title registries as it prevented access to the digitization of key information (ICR, para. 47). According to the ICR, "while some applications at the Land Registration Division appeared to be processed within a few months, by far the majority will take several years to process" (ICR, para. 48). Activities to scan and digitize documents related to title registry were not completed and will begin once GELIS is implemented (ICR, pg. 68).

The project improved the efficiency of land court cases. The Customary Land Secretariats (CLS) through Alternative Dispute Resolution resolved 307 cases (Target not achieved, Target: 2,000, ICR, pg. 34). The project reduced the number of months it took to solve a land dispute through the court system from 13.2 months to 9.2 months (ICR, para 49). The internal target for resolving a dispute through the court was set at 6 months, and it is expected to be achieved once the GELIS is fully implemented (ICR, para. 50). According to the ICR, the High Court (Civil Procedure) Rules, 2004 (C.I. 47) which was amended by the High Court allowed for Written Witness Statements. The provision of written statements has helped reduce the time to resolve land cases.

The refurbishment and automation in land courts have helped reduce the backlog of cases and to speed up processes, according to the ICR (pg. 63). The Review of Rules of the Court to improve adjudication has also had an effect on the reduction in time at the courts (ICR, pg. 63). Key land records were also scanned and digitized (ICR, pg. 63). A total of 8,266 cases have been resolved in land courts between 2011 and 2017 (World Bank Staff Interview, December 2018). Alternative Dispute Resolution (ARD) started in 2013, but there has been limited uptake as most individuals opt for court proceedings (ICR, pg. 63). While 36 cases went for mediation by ARD, only 6 were concluded (ICR, pg. 63).

While there was an increase in registered land transactions and registration land rights, business processes to streamline turn around were mixed. The turnaround times for land deeds improved slightly, but the project was unable to measure the turnaround time for registering land titles. Most problematic, the backlog of



application of title registrations grew and only a handful of first registrations and transferred were processed. As a result, it is clear that there continues to be important roadblocks when it comes to efficiency. While the project also improved the adjudication of land cases by reducing the time in court, refurbishment and automation, and by undertaking a review of the rules of the court, it remains to be seen whether service-delivery has improved its transparency.

Transparency

Outputs: A series of public outreach events were made possible as part of this project. For example, at least ten different media outlets were provided with basic information on standard statutory fees, land values, and changes of land transactions (Target Met, Target 10 media outlets, ICR, pg. 30). The messages were distributed through magazines, newsletters, newspapers, websites, notice boards, press engagements, and flyer reports (ICR, pg 65). In addition, there were 111 public outreach and awareness activities to increase awareness. A central communication officer was hired, who replaced the national and regional level communication officers (ICR, pg. 73).

Outcomes: While the ICR reported on the actions that were taken which aimed at distribution of information, the results framework had no indicators to measure whether the public understood, incorporated, or trusted the information provided regarding land administration and land management. There were also no indicators to measure the public's increased trust in land administration or management institutions or their perception of transparency.

Despite the lack of formal indicators, the project undertook a beneficiary survey. Results show that 62% of those surveyed received information on statutory fees and changes before accessing land services. The majority (78.4%) received the information from CSAUs' front desks, 13.3% from friends and family and 6.5% from media channels (online, print media, displays, etc.) (World Bank Interview, December 2018). This data shows that the public was receiving information related to land administration and processes.

Another important development that increases transparency in land administration and management, is the ability to track land rights through a public registry (ICR, para. 57). That said, the results framework did not have any substantial indicators to measure transparency.

Rating
Modest

Rationale

Overall, the project has been successful at strengthening the institutional foundation for land administration and land management by introducing key legislature, policies, and frameworks. While some bills have been passed, such as the Land Use and Spatial Planning Acts, other bills and policies were pending. The project decentralized service delivery to regions by establishing one-stop shops for the public. While there were no indicators in the



results framework to assess the efficiency, quality, or transparency of service of the CSAUs or CLSs, the ICR provided evidence that the public is aware of the CLS services and willing to use them, including related to dispute resolution and registering rights. The project codified customary laws and procedures. Although not measured, the codification of customary land and procedures has the potential to resolve conflict more effectively and transparently.

The project was able to produce outputs, such as maps, street signs, identification of parcels, etc. The ICR presented evidence that the orthophoto maps have been used. Meanwhile, the process of identifying and naming streets has led to new signage. Identification of new parcels and structures has the potential, while costly, led to an increase of revenue for the government in the form of growing property tax revenue. However, there were insufficient indicators to measure the use of land management outcomes, including revenue increase.

While there was an increase in registered land transactions and registration land rights, business processes to streamline turn around were mixed. The turnaround times for land deeds improved slightly, but the project was unable to measure the turnaround time for registering land titles. Most problematic, the backlog of application of title registrations grew and only a handful of first registrations and transferred were processed. As a result, it is clear that there continues to be important roadblocks when it comes to efficiency. While the project also improved the adjudication of land cases by reducing the time in court, it remains to be seen whether service-delivery has improved its transparency.

Another important development that increased the transparency in land administration and management was the ability to track land rights through a public registry (ICR, para. 57). That said, the results framework did not have any substantial indicators to measure transparency.

The overall Efficacy of the project is rated Modest. While there is evidence that land administration and land management was consolidated and strengthened, key indicators related to efficiency were either not met or not successfully measured. The ICR also argues that some of the indicators were not appropriate. Similarly, the results framework did not have adequate indicators to measure transparency. While the ICR provided some data related to transparency, it is insufficient to assess the achievement of the objective.

Overall Efficacy Rating
Modest

Primary reason
Insufficient evidence

5. Efficiency

Scope of Analysis: At appraisal, it was expected that the project would generate three sets of benefits: (i) improved land tenure security and the associated investment incentives, (ii) improved efficiency in the registration systems and service delivery, and (iii) improved quality and land information through the creation of geo-referenced land information, base maps, land use planning and street addressing, and implementation and monitoring of infrastructure projects (PAD, para. 45).



Economic and Financial Analysis: A cost-benefit analysis (CBA) approach was used at appraisal to assess the potential improvement resulting from the supply of land information. The strategy involved estimation of the gross domestic product (GDP) over time using trend analysis with data from 2003-2011 and then made an estimation of what the impact of the increased supply in land information would be on the economy based on research conducted in Australia. The analysis in the PAD estimated a cost-benefit ratio of US\$1.45, a Net Present value (NPV) of US\$27.82 million, and an Economic Rate of Return of 15% (PAD, pg. 58). At completion, the ICR undertook an analysis using a similar methodology. The cost-benefit ratio (CBR) was US\$2.61, a Net Present Value (NPV) of US\$ 65.84 million, and an Economic Rate of Return was 22% (ICR, para. 61).

At appraisal, the Financial Rate of Return (FRR) was calculated by comparing the difference in net revenue collected by the Land Commission with and without the project over the life of the project. The Land Commission collected revenue in the form of the stamp of due (transfer tax based on the value of the property involved), and fees collected for registration of deeds or titles, certified copies etc. At appraisal, the FRR was determined at 27%, with a CBR of US\$2.26 and an NPV of \$121.29 million (PAD, pg. 59). At completion, the ICR determined that the FRR was 57%, CBR of US\$1.97 and an NPV of US\$492.77 million (ICR, para. 62).

The administration costs allocated under Component 4: Human Resource Management and Project Management nearly doubled from US\$8.30 million IDA approved to US\$17.75 million at completion. All other component costs were lower than planned. The project was delayed a total of 34 months and the rise in Component 4 alludes to administrative inefficiencies.

The cost of completing a systematic survey and registration of 3,856 rural and parcels was significantly higher than in neighboring countries (Target Not Met, Target: 5,118, ICR, pg. 65). In Ghana, the process cost US\$124 per parcel, while similar work in Rwanda and Ethiopia cost US\$10 per parcel. The ICR speculated that the higher costs may have been due to excessive accuracy requirements, the requirement to place permanent markets, or 'opportunism' (ICR, para. 55).

Overall the economic and financial analysis showed that the investment in the project was efficient. As a result, the project's efficiency is rated as Substantial.

Efficiency Rating

Substantial

a. If available, enter the Economic Rate of Return (ERR) and/or Financial Rate of Return (FRR) at appraisal and the re-estimated value at evaluation:

	Rate Available?	Point value (%)	*Coverage/Scope (%)
Appraisal	✓	15.00	0 <input type="checkbox"/> Not Applicable



ICR Estimate	✓	22.00	0 <input type="checkbox"/> Not Applicable
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* Refers to percent of total project cost for which ERR/FRR was calculated.

6. Outcome

The project's objective was designed based on the country context. The program development objective supported and was fully aligned with the World Bank's Country Assessment Strategy (2008-2011) and with the Country Partnership Strategy (2013-2016). The objective and result framework did not build upon lessons learned from the previous project LAP1. The objective's relevance is rated substantial.

The project's efficacy is rated modest. The project was able to demonstrate that it has consolidated and strengthened land administration and land management. However, the ICR did not demonstrate the project's ability to fully meet its targets related to efficiency. For example, key indicators related to title or deeds registration were either not met or not successfully measured. While the project provided some data related to its achievement in increasing transparency, the results framework did not include any indicators to measure this outcome. More evidence was required related to the project's contribution to transparency.

The economic and financial analysis showed that the investment in the project was efficient. The project achieved an Economic Rate of Return of 22%, with a cost-benefit ratio (CBR) of \$2.61 and a Net Present Value (NPV) of US\$65.84 million (ICR, para. 61). The project's efficiency is rated substantial.

While both relevance and efficiency are rated as substantial, the modest rating of efficacy, primarily due to the lack of evidence, weighs down the overall outcome rating. As a result, the overall outcome of the project is moderately unsatisfactory.

a. Outcome Rating

Moderately Unsatisfactory

7. Risk to Development Outcome

There are two interrelated risks that can impact the sustainability of the objective:

Financial: While the Land Use and Spatial Planning Authority (LUPSA) was financed through the project, local planning activities were only financed through fees from construction permits and other services (ICR, para. 100). The legislation that established LUPSA also identified the need for a revolving fund to ensure planning is funded regularly. The Government of Ghana has yet to set up and operationalize a revolving fund (ICR, para. 100) and local planning activities depend on funding that fluctuates.



Technical: The Office of Administrator of Stool Lands and the Customary Land Secretariats proved to be capable (ICR, para. 101). However, there is the opportunity for abuse of their roles for financial gains (ICR, para. 101). Currently, the methods for auditing, ensuring social equity and assessing the impact of their activities are not robust and are in need of continued monitoring (ICR, para. 101). Similarly, the Land Commission and the Client Service Access Units showed little improvement in addressing title registry backlog and efficiency (ICR, para 102). Finally, effective roll out of the Ghana Commercial Agricultural Project (GELIS) informational system is imperative to address system enhancements and to add functionality. The information system is necessary to scan, index and populate the databases to improve turnaround times for deeds and title registration (ICR, para. 103). Thus, overall there continues to be a technical gap to ensure that the outcomes of the objective are sustainable.

8. Assessment of Bank Performance

a. Quality-at-Entry

The quality of design had several shortcomings despite it being designed as a follow-on project to LAP1.

The ICR noted that during program design, the Bank did not fully engage with key expertise related to the areas of work including land law, land registration, IT systems, geodetic survey, cadastral survey, planning valuation and property taxation (ICR, para. 75). Moreover, the ICR is clear that while implementing the project, key experts were missing. The ICR stated that “when reviewing the expertise utilized during project preparation and supervision, it is clear that at least land registration expertise, property taxation expertise, IT expertise and planning expertise were missing, and that unrealistic targets and expectations were included” (ICR para. 75). According to the ICR, the PAD described many activities that could “realistically never be met, and which were dropped during restructuring. Although funding was an issue, it is difficult to see how the targets could have been met [in any case],” (ICR, para. 76).

Moreover, while “the project was designed as an academic exercise, with all the key land administration and land management factors included, there was little practical recognition of what could be achieved” (ICR, para. 77). For example, according to the ICR, the project was “too ambitious with the scope and creating a complex set of components, sub-components, and activities that could not be fully implemented, although [they were] considered to be strategic and relevant” (ICR, para. 97).

Many of the lessons learned from LAP 1 were either not available or not considered. As a result, similar mistakes were made in preparing LAP 2 given that the PAD was prepared before the ICRR was finalized (ICR, para. 74).

The ICR accurately notes that the results framework was poorly designed and did not reflect the expected outcomes (ICR, para. 75). Relevant PDO indicators that could have measured and help report on the projects’ key achievements were not identified at entry. The results framework had no indicators to measure the transparency of service delivery, and efficiency indicators were poorly chosen.



The achievement of the PDO indicators, in particular, related to deeds and title registry, relied heavily on the completion and roll out of an Information Technology (IT system) developed under LAP1. However, this system could not be used and a new system needed to be developed in LAP2. During preparation, the Bank made IT related assumptions that were “extremely risky and a much better assessment of the proposals for IT should have been carried out during project appraisal” (ICR, pg. 78).

While some of the targets and activities shortcomings were later addressed during the restructuring, there were shortcomings in the quality of entry, particularly for a follow-on project (ICR, para. 76). As a result, the quality of entry is rated unsatisfactory.

Quality-at-Entry Rating Unsatisfactory

b. Quality of supervision

The project had three Task Team Leaders. The TTL who prepared the project handed it over shortly after project effectiveness and the second handover took place in October 2016. Handovers were well planned and there were smooth transitions, according to the ICR (ICR, para 84). That said, for most of the project period, a land specialist did not lead the team (ICR, para. 87). The project team also lacked sufficient expertise in the area of land title registry and IT systems development (ICR, para. 87)

The Bank team conducted bi-annual visits to assess fiduciary and social compliance and to identify key issues that needed to be addressed. According to the ICR, Aid Memoirs were completed satisfactory (ICR, para 83). However, the problems with backlogs at the title registry were identified in at least two aid memories, “but no time was spent on this fundamental problem and indicators were not adequately addressed” (ICR, para. 87). The ICR candidly states that “for most of the project period until the appointment of the last TTL, a land specialist did not lead the team, and nobody was included with sufficient expertise who could understand how to address the issues with the land title registry and the IT system’s development (ICR, para. 87).

While the MTR was detailed and addressed several key issues, many of the proposed changes such as simplification of the PDO statement and consistent indicators were not reflected in the project paper or in the subsequent restructuring (ICR, para. 85). The project was downsized at the MTR due to reductions of funding (ICR, para. 88)

The project suffered from a lack of follow through on financial commitments. For instance, during the restructuring process, the Government of Ghana’s financial commitment decreased from US\$ 5 million to US\$1 million and was further reduced to zero (ICR, para. 82). The beneficiary contribution was discussed but this possibility was not mentioned in project documents or addressed during implementation (ICR, para. 82). The reduction of financing from the Government of Canada from US\$15 million to US\$2.5 million also impacted the project’s ability to complete activities and led to the project’s restructuring.



The quality of supervision is rated unsatisfactory. The Bank followed standard procedures of producing satisfactory Aide Memoires, conducting bi-annual meetings and effectively coordinating staff-transitions. However, the Bank consistently failed to identify or address critical shortcomings, such as PDO indicators, backlogs of title-registry, and poor M&E processes, that were discussed in the MTR. The lack of insufficient expertise in the area of land registry and IT system contributed to poor project results.

Quality of Supervision Rating

Unsatisfactory

Overall Bank Performance Rating

Unsatisfactory

9. M&E Design, Implementation, & Utilization

a. M&E Design

The appraisal documents outlined monitoring and evaluation responsibilities. As designed, an M&E Specialist would coordinate activities and report directly to the Director of M&E at the Ministry of Land and Natural Resources. Regional project coordinating units would be responsible for collecting primary data. The M&E Specialist would collate the data at the national level. (PAD, para. 42). Customary Land Secretariats would be responsible for simple community monitoring and providing data generated to the regional offices (PAD, para. 42). Civil Society organizations would cross-check performance as a part of a third party verification system (PAD, para. 42).

The theory of change underpinning this objective was clear, logical, and supported by adequate activities.

The results framework had several gaps. As the ICR notes, the results framework was not in line with the theory of change and was poorly designed (ICR, para. 8). For example, key aspects of land ownership – such as informally held land- were not covered by the PDO indicators (ICR, para. 8). Critical indicators were missing from the results framework and thus inhibiting the project's ability to document its results. For example, there were no indicator to measure contributions towards the implicit and higher level PDO of improving business development and economic growth. The results frameworks focused primarily on proxy indicators related to the efficiency of registration of deeds and titles registration. Transparency was only measured by whether information on the land administration and land management changes was made publicly available. This is not only an output indicator, but it is also a very limited definition of transparency.



The PAD's results framework or indicators failed to adequately define key aspects of the objective, including consolidation and strengthening. There were no indicators to measure achievement or outcomes of strengthened policy, legal or regulatory framework.

While the intermediate indicators provided insight into the activities that were conducted, they did not describe the outcome or quality of such activities. Moreover, the ICR reflected that "the intermediate indicators are all output-based and these did not inform whether there is an impact on the expected beneficiary or whether the PDO was met" (ICR, para.35).

b. M&E Implementation

The project did not adequately focus on implementing a monitoring and evaluation system that would enable the project to capture results. While data was collected regularly, MTR recommendations related to the PDO indicators were not followed through and implemented.

During the restructuring, the project team did not use this opportunity to address the significant result framework flaws.

The M&E specialist position was not filled for long periods of time (ICR, para. 91). Furthermore, there were insufficient data quality checks on key PDO targets. For example, data collected to report on turnaround time for land title registry was not adequately disaggregated according to the registration of transaction and first-time registration of property right (ICR, pg. 65). According to the ICR, the M&E tables estimating land title registry were not supported by facts (ICR, pg. 65).

c. M&E Utilization

According to the ICR, the results framework was utilized to monitor outputs and focus on areas that were not achieving expectations (ICR, para. 91).

The Quality of Monitoring and Evaluation is rated Modest. The design of the M&E system has significant shortcomings which were not addressed throughout the life of the project. As a result of a poorly designed and implemented M&E system, the project was not able to measure and document the extent of its outcomes. As the ICR summarizes "although the indicators were useful and used regularly during project implementation to identify and correct areas that were not performing as expected, [there was a] fundamental flaw with the design, and the failure to take action on the key problems with the title registration or with respect to the PDO indicators." (ICR, para 92).

M&E Quality Rating

Modest



10. Other Issues

a. Safeguards

The project was classified as Environmental Category “B” Partial Assessment. At appraisal, it triggered the following safeguards: Environmental Assessment (OP 4.01), and Involuntary Resettlement (OP/BP 4.12), (PAD, pg. 20). The PAD anticipated that environmental and social impacts would be minimal. It was the construction of a new office in Kumasi that triggered an Environmental Assessment. The construction and rehabilitation of courts may include loss of vegetation, cover, biodiversity, loss, pollution, contamination of soil and water (PAD, pg. 20). Health and Safety risks included accidents at work camps (PAD, pg. 20)

The ICR did not include whether any activities had generated environmental or social impact during implementation. According to the World Bank Staff Interview, a customary land intervention assessment was prepared in June 2017 (World Bank Staff Interview, December 2018). A safeguard specialist reportedly regularly on work completed on safeguards (World Bank Staff Interview, December 2018). According to the ICR, resettlement and other safeguards activities were implemented in compliance with the Bank’s policies (ICR, para 93).

b. Fiduciary Compliance

Financial management: Financial management was rated satisfactory by the Bank. (ICR, para. 95) According to the ICR, the project complied in full with the financial covenants of submitting acceptable financial reports (ICR, para. 95). The project submitted periodic financial reports, with occasional minor delays related to deadlines. The audit report of 2017 was received within the six month period after the end of the fiscal year and thus in compliance with the provision of the Financing Agreement. Per a review of the management letter, the auditor’s noted that there were no major internal control deficiencies or general accountability issues (ICR, para. 95).

Procurement: According to the ICR, procurement procedures functioned well with some delays in approval and payments. The procurement processes went well, in particular, the refurbishment of courts and the establishment of CSAUs (ICR, para. 81). There were delays in the Kumasi building construction and the GELIS contract. In both of these activities, the Bank could have been more pro-active (ICR, para. 81). In fact, according to the ICR, despite “ the experience with IT Systems and the very serious risk that the designed system could not be implemented in time, a decision to simplify and take a different direction was not made” (ICR, para. 86). There were no INT investigations. Procurement Risk rating at the time of writing the ICR was moderate while the Procurement Performance rating was Moderately Satisfactory (ICR, para 96).

c. Unintended impacts (Positive or Negative)

None



d. Other

None

11. Ratings

Ratings	ICR	IEG	Reason for Disagreements/Comment
Outcome	Moderately Satisfactory	Moderately Unsatisfactory	The outcome rating is weighted down due to the efficacy modest rating. There is insufficient evidence to show that efficiency and transparency of service-delivery had been strengthened and consolidated as a result of the project.
Bank Performance	Moderately Unsatisfactory	Unsatisfactory	The Bank consistently failed to identify or address critical shortcomings, such as PDO indicators, backlogs of title-registry, and poor M&E processes, that were discussed in the MTR and identified in aid memoirs. The lack of insufficient expertise in the area of land registry and IT system contributed to poor project results.
Quality of M&E	Modest	Modest	---
Quality of ICR		Substantial	---

12. Lessons

The lessons are taken from the ICR with some modification of language:

1. Adequate staff planning is necessary in complex land administration and land management projects. For example, the project did not include a land specialist for most of the duration of the project. A land specialist with acute knowledge of land administration and land management could have informed decisions, including design approaches, through a practical lens (ICR, para. 107). If funds are not available for land specialists, then the project needs to be simplified accordingly (ICR, para. 107).



2. Customary Land Demarcation and Surveying can be expensive, complex, and produce harm. For example, the customary land demarcation brought to light a boundary conflict that was previously dormant. The surveying was more expensive than previously anticipated. To conduct these types of activities, the benefits must outweigh the costs and the process needs to be clearly identified and reviewed (ICR, para. 109).

3. Implementation and completion of major IT systems was not realistic within a 5-year project cycle. The IT system for this project was not completed on time and this impacted the overall achievement of the key project indicators. The design and feasibility of IT systems need to be concluded prior to the appraisal and be feasible within the 3-year period. The ICR recommends that if the IT system is not contracted within the first year of the project, then projects should rethink, take action to simplify, or downsize expectations (ICR, para. 108).

4. Establishing sound management through steering committee helps project management and component ownership. For example, the project established a steering committee to ensure that five different implementers from different ministries could work together and coordinate effectively. The steering committee members took responsibility for their own mandate and ensured activities were implemented successfully (ICR, para. 105i).

The following lesson is derived by the IEG:

6. Lack of attention to monitoring and evaluation systems impedes the ability of the project to measure and document its achievements. For example, the ICR highlighted key areas of achievement of the program like the human resources planning and training. However, the program failed to collect supplementary and complementary data to demonstrate success. Failure to pay attention to the M&E system led to inadequate indicators which were unable to fully capture the program story and its achievements.

13. Assessment Recommended?

Yes

Please explain

This project is a follow-on project to LAP1. The ICRR for LAP1 downgraded its project ratings. The ICR for LAP2 is frank about the inadequate monitoring and evaluation system, as well as issues with key PDO indicators. The Government of Ghana has requested additional financing and the project is expected to be extended until 2021. However, the IEG ratings for efficiency is modest due to lack of data across the entire project. As a result, it is imperative that additional data is collected, and key achievements validated, to fully capture all the lessons learned, to understand the project's achievements, and to identify key areas of improvement before the appraisal documents of the additional financing are completed.



14. Comments on Quality of ICR

The ICR was well written and provided sufficient information, albeit with some information gaps. The ICR provided a good and useful theory of change that helped frame the report and the findings. The Efficacy section was clear and well organized despite the lack of relevant indicators in the project's results framework. The ICR made an effort to include relevant supplementary information, in particular in Annex 7. Some of the information in Annex 7, such as the gravity of not meeting the title registration PDO indicator should have been included in the efficacy section more prominently. The project developed a training report and undertook a beneficiary survey; unfortunately, evidence collected through these two processes were not sufficiently included in the ICR.

The definitions of land administration and land management was very useful. However, the ICR's definition of consolidation and strengthening could have been better articulated.

The ICR included candid analysis related to the Monitoring and Evaluation and the Bank's overall performance.

The ICR could have been more explicit about how it went about meeting and complying with Safeguards.

a. Quality of ICR Rating

Substantial