

MARK GOLDSMITH  
Chairperson  
The Inspection Panel

March 15, 2024

**IPN REQUEST 24/02**

**MEMORANDUM TO THE EXECUTIVE DIRECTORS  
INTERNATIONAL DEVELOPMENT ASSOCIATION**

**Inspection Panel Notice of Non-Registration  
on a  
Request for Inspection  
Pakistan: Sindh Flood Emergency Rehabilitation Project (P179981)**

**Summary**

1. In accordance with paragraph 18 of the Resolution<sup>1</sup> of the Inspection Panel (the “Panel”), I hereby inform you that on February 12, 2024, the Panel received a Request for Inspection (the “Request”) of the Pakistan: Sindh Flood Emergency Rehabilitation Project (P179981) (the “Project”).
2. The Request was submitted by two individuals living in the Project area (the “Requesters”), who asked the Panel to keep their identities confidential. The Requesters allege that the Project activities encroached on their land, and the Project refused to pay them compensation. They state they have suffered a “*huge loss*” because of the Project. The Requesters claim they received no help from the Bank’s Grievance Redress Service, though they had submitted a complaint. The Requesters allege they received “*death threats*” from the police, local politicians, contractors, and officials from the Project’s implementation agency.
3. After conducting its due diligence, the Panel is not registering this Request due to the absence of a plausible link between the alleged harm in the Request and the Bank-financed Project.

**The Project**

4. The Project was approved on December 19, 2022, for a total Project cost of US\$ 510 million. Out of the total Project cost, US\$ 500 million equivalent is financed through International Development Association Credit, and the Borrower is providing US\$ 10 million. The Project is designed and implemented following the 2018 Environmental and Social Framework. The closing date of the Project is December 31, 2027. At the time of the receipt of the Request, 48 percent of the IDA Credit was disbursed. The Borrower is the Islamic Republic of Pakistan, and the implementing agencies are the Irrigation Department, and the Planning and Development Department of Sindh Province.

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<sup>1</sup> The World Bank Inspection Panel, International Development Association, Resolution No. IDA 2020-0003, September 8, 2020 (the “Resolution”).

5. The Project Development Objectives are to “(a) *rehabilitate damaged infrastructure and provide short-term livelihood opportunities in selected areas of Sindh province affected by the 2022 floods, and (b) strengthen the Government of Sindh’s capacity to respond to the impacts of climate change and natural hazards.*”<sup>2</sup> The Project has five components. The issues raised in the Request relates to Component 1 of the Project. Component 1 aims to enhance physical resilience through restoration, rehabilitation and improvement of critical irrigation and flood protection infrastructure, water supply schemes, roads and allied infrastructure in flood-affected areas.<sup>3</sup>

## **The Request**

11. The Panel received the Request for Inspection on February 12, 2024, from two individuals living in the Project area. The Requesters asked the Panel to keep their identities confidential. The Request alleges that the Project is conducting repair work of canals by increasing the canal embankment. It adds that the Project encroached on the land that one of the Requesters claims to own. The Request alleges that the Project “*refused to pay compensation*” for land that is allegedly acquired. The Request states that this is “*against the law and also against the World Bank law.*” The Request also states the Requester, who claiming to own the land, has “*suffered a huge loss.*”

12. The Request states that these concerns were reported to the Bank’s Grievance Redress Service (GRS), but the complainants received “*no helped [sic] from them.*” The Request adds that the GRS officials stated that their team would resolve the complainants’ concerns. The Request claims that on January 26, 2024, the Bank team came to inspect the Project activities in the region but did not contact the Requester claiming to own the land, which prompted the submission of the Request for Inspection.

13. The Requester claiming to own the land states to have received “*death threats*” from the police, local politicians, contractors, and officials of the Irrigation Department.

## **Panel’s Observations and Determination**

14. In accordance with its Operating Procedures,<sup>4</sup> after receiving the Request and after some clarifications from the Requesters, the Panel issued a Notice of Receipt on its website on February 28, 2024. The Panel conducted its due diligence by reviewing the information contained in the Request and Project documents.

15. The Panel spoke with the Requesters in February and March 2024 to better understand the concerns raised. On March 4, 2024, the Requester, claiming to own the land, wrote to the Panel and indicated that they had sold their land, but it is being returned to them due to the Project activities and the land registration process is underway.

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<sup>2</sup> The World Bank, [Sindh Flood Emergency Rehabilitation Project \(P179981\) Project Information Document \(PID\)](#), November 10, 2022, p. 8, para. 16.

<sup>3</sup> PID, p. 9, paras. 18-21.

<sup>4</sup> Inspection Panel Operating Procedures, December 20.

16. The Panel met with Management on March 14, 2024, to understand the Project from Management's perspective. Management told the Panel that the Project is using the right-of-way of the canal and that no land acquisition is required for the Project. Management added that the Project Implementation Unit (PIU) made efforts to amicably settle the dispute, that was raised to the GRS, by offering to acquire the land, subject to proof of ownership, to avoid legal disputes that would delay the Project works beyond the upcoming monsoon season. Management also indicated that the PIU had recently formally communicated to the Bank that they had decided to change the technical design of the Project, and that the updated design negated the need to use the land for the Project.

17. Based on the information gathered, including from one of the Requesters' emails, the Panel understands that the Requester is not the owner of the land that the Project is allegedly impacting. Henceforth, the Panel determines that there is no plausible link between the alleged harm raised in the Request and the Bank-financed Project. On this basis, the Panel is not registering the Request for Inspection.

18. In light of the foregoing and in accordance with the Panel Resolution and its Operating Procedures, and after reviewing the information gathered through its own due diligence, I am informing you that the Panel is not registering this Request for Inspection. This non-registration does not preclude the possibility of a future Request for Inspection related to this Project.

Yours Sincerely,



Mark Goldsmith

Attachment: Request for Inspection (redacted)

Copy to:

Mr. Ajay Banga, President, International Development Association

Requesters (confidential)



Attachment

**Request for Inspection  
(Redacted)**



# Complaint (Request for Inspection) Form

To:

The Chair, Inspection Panel

The World Bank Accountability Mechanism, MSN: MC 10-1007, 1818 H St., NW, Washington, DC 20433, USA. Fax: +1(202)-522-0916. Email: [ipanel@worldbank.org](mailto:ipanel@worldbank.org)

*(Please answer the questions below as best as you can. Once the form is submitted, we will contact you to collect any additional necessary information.)*

## Section 1: Complaint

1. What harm do you believe the World Bank-financed project caused or is likely to cause to you or your community? Please describe in as much detail as possible.

The project run in collaboration with the World Bank has given me a lot of damage. The World Bank is continuing the repair work of the canals in our area, where 14 gates have been installed for stone paving and drainage. Due to 14 gates, Irrigation (SRP) and Sindh Emergency Flood Rehabilitation Project together have encroached on my land by increasing the embankment of the canal. I requested them to compensate me for the work you have done on my land. But he has refused to pay compensation for the land. Irrigation, Sindh Flood Emergency Rehabilitation Project representatives, ██████████ Consultants, ██████████. All of them have seized my compensation by force. I have suffered a huge loss from Willard Bank's scheme, please give me my compensation.

2. What is the name of the World Bank project? (If known)

I don't know the name of the World Bank project, but the representative of Sindh flood Emergency Rehabilitation Project, who are following the works of the world bank. Who is working as an assistant in the sindh province of Pakistan for the World Bank.

3. Where is the World Bank project located? (Please include country name)

Its location is in ██████████ (Country Pakistan, province Sindh)

4. Do you live in the project area?

Yes

5. Have your concerns previously been reported to the World Bank? If yes, please provide the details about those communications and explain why you are not satisfied with the Bank's response.

Yes I reported these concerns to GRS but no helped from them. GRS officials said that our team will meet you in Pakistan and solve your problem. On 26th January 2024, the World Bank team came to inspect the World Bank's activities in our region. They didn't contact to me. So now I am writing my complaint to the inspection panel for resolve my issue related world bank supported program. Please help to me. I should be compensated for my land. The corrupt representative of the Irrigation Department have grabbed the compensation of my land.

6. If known, please list the World Bank's operational policies procedures you believe have not been followed.

According to World Bank Pc-1. There is amount for land acquisition in my case project acquired huge land without giving any lawful compensation to the land owner, which against the law and also against the World Bank law.

7. Do you expect any form of retaliation or threats for filing this complaint?

Yes absolutely. I have received death threats from local politicians, contractors, officials of the Irrigation Department and threats of police and FIR filling. I have been attacked a couple of times. Please help me.

8. In addition to receiving information about the Compliance investigation process, would you also like to receive information about the option of dispute resolution?

Dear sir,  
It is informed you that I have not received any information/compliance from any department of Government of Sindh regarding my issue of land acquisition which is encroached in construction of Aral head bund at [redacted]. It is once requested to you kindly help me.  
Thanks  
[redacted] Sindh.

## Section 2: Contact Information

9. Are you complainants or a representative of complainants\*?

Complainants:  Representing a complainant or community:  Other:  (Please explain)

10. Would you like your name and contact details to be kept confidential? (We will not disclose your identities to anyone without your prior consent.) Yes  No

11. Complainants' or representatives' names (minimum two names and signatures are required):

	Complainant /Representative 1	Complainant /Representative 2
Name	[redacted]	[redacted]
Address	[redacted] [redacted]	[redacted] [redacted]
Phone	[redacted]	[redacted]
Email	[redacted]	[redacted]

12. By completing and submitting this form, we authorize the Inspection Panel to investigate the issues as described in this form.

Signature1	Signature2
[redacted]	[redacted]

Signatures (more signatures can be sent as an attachment):

### NOTES:

- *\*If you are a representative of complainants, we will need a letter from the complainants authorizing you to represent them.*
- *Please attach supporting documents, if available.*
- *If you have any difficulty in completing the form, please contact the World Bank Accountability Mechanism at Email: [ipanel@worldbank.org](mailto:ipanel@worldbank.org) or by phone: +1-202-458-5200.*