MANAGEMENT RESPONSE TO
REQUEST FOR INSPECTION PANEL REVIEW OF THE
TANZANIA: MSIMBAZI BASIN DEVELOPMENT PROJECT (P169425)

Management has reviewed the Request for Inspection of the Tanzania: Msimbazi Basin Development Project (P169425), received by the Inspection Panel on April 14, 2026, and registered on May 29, 2026 (RQ26/06). Management has prepared the following response.

June 28, 2026

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ABBREVIATIONS AND ACRONYMS

BRT	Bus Rapid Transit
ESF	Environmental and Social Framework
ESMS	Environmental and Social Management System
ESS	Environmental and Social Standard
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
IDA	International Development Association
IEC	Information, Education, and Communication
IPN	Inspection Panel
LBLRA	Land-Based Livelihood Restoration Assistance
LRP	Livelihood Restoration Program
PAPs	Project-affected Persons
PIU	Project Implementation Unit
PMO	Prime Minister's Office
PO	President's Office
RALG	Regional Administration and Local Government
RAP	Resettlement Action Plan
RPF	Resettlement Policy Framework

Currency Unit
Tanzanian Shilling (TZS)
United States Dollar (US$)
As of June 28, 2026

TZS 1.00 = US$0.0004
US$ 1.00 = TZS 2,634.74

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EXECUTIVE SUMMARY

Project

i. ***The Tanzania Msimbazi Basin Development Project (P169425) aims to strengthen flood resilience and promote integrated urban development in the lower Msimbazi River Basin, a flood-prone yet economically vital area of Dar es Salaam.*** To achieve this, the Project combines large-scale flood mitigation, resilient infrastructure, environmental restoration, urban regeneration, institutional strengthening, and social interventions.

ii. ***The Project comprises five integrated components designed to strengthen flood resilience and support sustainable urban development in the lower Msimbazi River Basin.*** Component 1 finances major infrastructure investments, including flood control works, resilient transport infrastructure, development of a flood retention area and city park, urban redevelopment, and watershed restoration through reforestation, erosion control, and waste management. Component 2 supports the preventative resettlement of flood-prone communities and other Project-affected persons (PAPs) through compensation, resettlement assistance, and livelihood restoration programs to ensure affected households can relocate safely while maintaining or improving their incomes. Component 3 focuses on strengthening institutions, governance systems, and coordination mechanisms for managing the Msimbazi Basin, the Msimbazi Special Planning Area, and surrounding urban areas. Component 4 finances Project management, implementation, monitoring, and compliance activities, while Component 5 provides contingent emergency financing to enable rapid response and recovery following eligible natural or man-made disasters. Together, these components combine physical investments, social safeguards, institutional reforms, and emergency preparedness to reduce flood risk, improve livability, and support long-term resilient urban growth in Dar es Salaam.

iii. ***Component 2, Preventative Resettlement (US$55 million, including additional financing), is a central pillar of the Project because long-term flood resilience depends not only on infrastructure but also on safely relocating vulnerable communities living in high-risk floodplain areas.*** The component finances the resettlement of thousands of PAPs in accordance with the World Bank Environmental and Social Framework (ESF). It includes compensation and relocation assistance for affected households, tenants, businesses, and other displaced persons, through land acquisition, delivery of entitlements, and both in-kind and in-situ resettlement options. This approach seeks to provide secure housing and land in safer, non-flood-prone locations while minimizing disruption to livelihoods and reducing the likelihood that affected households return to hazardous areas. Extensive consultation and outreach processes support informed decision-making by affected communities throughout implementation.

iv. A key feature of Component 2 is its Livelihood Restoration Program (LRP), which recognizes that approximately 90 percent of affected households depend on informal economic activities linked to their proximity to central Dar es Salaam.

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Implemented alongside compensation and relocation, the program provides training, services, equipment, and other support to help restore or improve incomes after resettlement.

Request for Inspection

v. The Request for Inspection was submitted by two individuals on behalf of 412 persons (the "Requesters") from Dar es Salaam, Tanzania. The Requesters have asked for confidentiality. The Request alleges "improper implementation" of the Project's compensation and resettlement process. Specifically, it claims that a number of PAPs have not received compensation despite their properties having been identified during the valuation process. According to the Request, affected households have lost land, building rights, and livelihoods without receiving compensation in accordance with the Project's Resettlement Action Plan (RAP) and applicable standards. The Request further alleges that land compensation is being provided at a "flat-rate" amount that does not reflect actual market values, resulting in compensation that is unfair and inadequate for PAPs.

Management's Response

vi. ***Management has carefully reviewed the concerns raised in the Request for Inspection. In Management's view, the ongoing resettlement process under the Project is consistent with the approved RAP and applicable Bank policy requirements.*** No demolition, site clearance, or displacement has or will take place in any area prior to provision of entitlements to the PAPs, in accordance with Environmental and Social Standard 5 (ESS5) and the approved RAP.

vii. ***The Request appears to be based on an incorrect understanding of the documentation and requirements applicable to the Project's resettlement program. It does not provide evidence that the entitlements and the process of determining eligibility or the delivery of these entitlements are inconsistent with the approved RAP or ESS5. Two misunderstandings appear to be central to the Request:***

- ***That under ESS5 all PAPs are entitled to compensation at replacement cost for the land they occupy, regardless of their legal rights or status with respect to that land, which is incorrect; and***
- ***That all PAPs residing in the area hold valid ownership or recognizable claims to the land, when in fact most PAPs do not hold such documentation. Some PAPs, however, held expired recognizable documents, for instance, while others held documents that were issued to deceased relatives with unresolved inheritance proceedings.***

viii. ***Management will work with the Borrower to proactively address these misconceptions, which point to the need to further intensify outreach and information materials about RAP entitlements and differences in tenure. Moreover, Management will reinforce the message that it has no role in adjudicating legal***

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disputes regarding the validity of such tenure documentation, which will need to be adjudicated by Tanzanian courts of law.

ix. The principal misunderstanding concerns entitlement to land compensation under ESS5, which provides for compensation at replacement cost for land only to PAPs who have legal rights or recognizable claims to the land under national law. Persons without such rights or claims are not entitled to compensation for land loss; instead, they receive compensation at replacement cost for non-land assets, as well as resettlement assistance, including in-kind resettlement options or cash support to obtain land with secure tenure at an alternative site.

x. ***The Project's RAPs provide support based on each PAP's circumstances.*** The Requesters' claims largely appear to be based on the mistaken assumption that all PAPs, including those without legal rights or recognizable claims to land, are entitled to land compensation at replacement cost. This misunderstanding underpins their assertion that the Project's resettlement approach is inconsistent with ESS5 and the RAPs.

xi. ***The Request does not identify specific individual cases that would allow Management to verify and respond to the allegations raised. Given the anonymity of the Requesters, Management is unable to verify the specific claims attributed to the 412 individuals referenced in the Request.*** Nevertheless, the Project has engaged with a subset of PAPs through approximately 18 cases submitted through the Grievance Redress Service (GRS), some of which may involve individuals represented in the Request. As a result, Management's response is necessarily limited by the absence of detailed information and focuses instead on the applicable entitlements, the relevant documentation, and the systems in place to implement the resettlement program.

xii. ***Management acknowledges a document disclosure error.*** When the Project Implementation Unit (PIU) launched its new website in April 2024, an earlier draft of the Lower Msimbazi RAP from 2022 was posted rather than the final version approved and disclosed in 2023. The excerpts attached to the Request for Inspection appear to have been drawn from this draft version. Management contacted the Government and requested that the 2023 version of the RAP be disclosed on the Project's website. The final 2023 RAP remained available on the Bank's website throughout. Management has confirmed that the differences between the 2022 draft and the 2023 RAP are not material to eligibility or entitlements and do not affect the responses to the Request. The 2023 RAP primarily provides additional information and clarifications based on entitlement validation, land ownership due diligence, and refinement of the valuation methodology. This disclosure of a draft 2022 RAP may have contributed to confusion. The issue has now been corrected, and the Borrower will undertake additional community outreach.

xiii. ***Management notes that most residents within the lower Msimbazi floodplain area do not hold legal rights or recognizable claims to the land they occupy under national law.*** Most lack supporting documentation, hold documents that had expired before the Lower Msimbazi RAP cut-off date, or rely on documents issued to deceased relatives with unresolved inheritance matters. The lower Msimbazi floodplain has long been classified by the Government as hazardous and unsuitable for settlement. Consistent with ESS5 and the Lower Msimbazi RAP, 96 percent of PAPs who own

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structures in the lower Msimbazi floodplain have been offered and, following their acceptance, have received compensation for non-land assets, and resettlement assistance, including support to acquire land with secure tenure at an alternative site. Some residents dispute the Government's determination of the validity of their land occupancy or use documents. However, the Bank cannot adjudicate questions of domestic law or land tenure status and has advised these individuals to pursue any challenges through the appropriate administrative or judicial processes in Tanzania. Consistent with Bank policy, the Bank has also advised the Government that where entitlement claims remain under administrative or judicial review, the corresponding compensation amounts should be placed in escrow pending resolution.

xiv. ***Only a minority of PAPs (18) hold legal rights or recognizable claims to land through valid and unexpired Certificates of Right of Occupancy, Residential Licenses, or Letters of Offer.*** Consistent with ESS5 and the Lower Msimbazi RAP, these PAPs are entitled to compensation for land at replacement cost, and a valuation process is underway. This process is complex because the land is located within the lower Msimbazi floodplain, which has long been designated as hazardous and unsuitable for settlement under national law, a characterization affirmed by the High Court of Tanzania. To ensure compensation at replacement cost in line with ESS5, the Government and the Bank agreed to value these parcels based on comparable alternative land outside the floodplain. These PAPs will be offered either replacement land with comparable characteristics or its replacement cost cash equivalent, consistent with the Lower Msimbazi RAP and ESS5.

Actions

xv. Management acknowledges that the Lower Msimbazi RAP and its entitlement framework are complex and that, despite extensive consultation, additional efforts are needed to improve understanding of eligibility, entitlements, livelihood restoration measures, and grievance mechanisms among PAPs.

xvi. To address these concerns before civil works commence, Management will support the Government in: (i) implementing an enhanced outreach and communication plan for Lower Msimbazi PAPs, including targeted engagement with vulnerable groups and civil society organizations; (ii) preparing and disseminating a non-technical Swahili summary of the Lower Msimbazi RAP and conducting additional awareness-raising activities through community meetings, grievance clinics, and public information campaigns; (iii) recruiting an independent third-party monitor to conduct an audit of RAP implementation, including assessment of grievance management; and (iv) updating the Lower Msimbazi RAP to reflect implementation progress, clearer explanation of the valuation approach, and more detailed information on PAPs. The update will include further stakeholder consultations, and the implementation of the enhanced outreach plan will be completed by December 2026.

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Conclusion

xvii. Management believes that the Bank has correctly applied its policies and procedures applicable to the Project. In Management's view, the Bank has also followed the policies and procedures applicable to the matters raised by the Request. As a result, Management believes that the Requesters' rights or interests have not been, nor will they be, directly or adversely affected by the alleged failure of the Bank to implement its policies and procedures.

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I. INTRODUCTION

1. On May 29, 2026, the Inspection Panel registered a Request for Inspection, IPN Request RQ26/06 (hereafter referred to as "the Request"), concerning the Tanzania: Msimbazi Basin Development Project (P169425) financed by the International Development Association (IDA, or the "Bank").

2. ***Structure of the Text.*** The document contains the following sections: Section II presents the Request, Section III provides Project background, and Section IV contains Management's response. Annex 1 presents the Requesters' claims, together with Management's detailed responses, in table format. Other annexes include a sample of Project outreach activities and documentation, and maps of the Project site.

II. THE REQUEST

3. The Request for Inspection was submitted by two individuals on behalf of 412 persons (the "Requesters") from Dar es Salaam, Tanzania. The Requesters have asked for confidentiality.

4. The Request alleges "improper implementation" of the Project's compensation and resettlement process. Specifically, it claims that a number of Project-affected persons (PAPs) have not received compensation despite their properties having been identified during the valuation process. According to the Request, affected households have lost land, building rights, and livelihoods without receiving compensation in accordance with the Project's RAP and applicable standards. The Request further alleges that land compensation is being provided at a "flat-rate" amount that does not reflect actual market values, resulting in compensation that is unfair and inadequate for PAPs.

5. The following attachments are included in the Request as supporting documentation:

- Pages 45 and 49 of what the Request describes as the Project RAP[1] outlining the Project's land valuation procedure and compensation policy for affected land;

- Page 70 of that same version of the RAP under Section 10.3. ("Criteria for offering 'in-kind' compensation to the PAPs") which describes a "flat-rate" approach for apportioning land for a specific cluster of PAPs, covering those with previously demolished property or submerged land and who have chosen in-kind delivery of entitlements;

[1] These pages do not match any of the RAPs approved by the Bank and disclosed on the Bank's website but appear to be from a draft (i.e., not finalized and approved by the Bank) of the first version of the lower Msimbazi River Basin RAP under the Project – for further details on the different RAPs of the Project, please see Section IV below.

- Valuation form number 3 of the Valuation and Appraisers (Registration) Act, in Swahili, showing a sample (redacted) of the assessed values of affected structure and land;

- A compensation agreement form, in Swahili and redacted, indicating compensation for certain categories of assets but not for land; and

- Communication of February 2026 with a World Bank country office representative, as evidence of prior contact with the Bank.

6. No further materials were received by Management in support of the Request.

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III. PROJECT BACKGROUND

7. The Project Development Objective is to strengthen flood resilience and integrated urban development in an economically important and flood-prone area of the Msimbazi River Basin in Dar es Salaam. The Project aims to transform the basin through a set of integrated investments to reduce the impact of flooding, catalyze sustainable urban development, and improve livability.

Project Components

8. ***Component 1: Msimbazi River Basin Development Infrastructure (US$215 million).*** This component provides an integrated, long-term solution to substantially reduce the impacts of floods in the lower Msimbazi River Basin that will improve hydraulic capacity of the river, provide an area for flood water detention, build resiliency of key transport infrastructure, regenerate valuable land assets to control encroachment in flood-prone areas and allow for public recreation and urban development, and reduce degradation of the Msimbazi watershed. Moderate to extreme climate change scenarios are used in conjunction with urbanization scenarios that inform engineering designs, to substantially reduce the vulnerability of the basin and the city to climate change.

- *Subcomponent 1.1: Flood control interventions*. This subcomponent addresses key priorities for flood control infrastructure in the lower Msimbazi River Basin. The subcomponent will finance, *inter alia*: (a) recontouring the riverbed in the lower-basin floodplain area of the Msimbazi valley, including river channeling, excavation of floodplain/river dredging and construction of multi-level flood retention areas (terracing works) to improve river conveyance; (b) carrying out riverbank protection works; (c) managing river sedimentation through the construction and operation of river maintenance depots, sediment and litter traps, and equipment; (d) carrying out construction supervision activities; and (e) implementing analytical studies and detailed designs.

- *Subcomponent 1.2: Resilient transport infrastructure.* This subcomponent upgrades key transport infrastructure in the Project area and minimizes disruptions during the rainy season, incorporating climate- and disaster-resilient designs. The subcomponent will finance, *inter alia*: (a) widening and raising the Jangwani Bridge to accommodate flash flood events; and (b) demolishing the extant Jangwani Bus Depot and relocating it (construction of new facilities) to a flood-proof new location.

- *Subcomponent 1.3: Msimbazi city park and redevelopment area.* This subcomponent finances interventions to implement and sustain the land uses in the flood retention area in the lower Msimbazi River Basin to reduce the risk of encroachment and allow for recreational and low-carbon and resilient real estate development. The subcomponent will finance, *inter alia*: (a) carrying out a wetland and city park development in the lower Msimbazi River Basin, including greening and mangrove revitalization, utilities infrastructure and equipment, and construction of streets and pathways, sports and recreation facilities, and market

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areas; and (b) constructing an approximately 57-hectare site in an upper terrace in the Msimbazi valley, as well as ancillary service infrastructure to enable a mixed-income, mixed-used urban development.

- *Subcomponent 1.4: Watershed management through greening, erosion control, and litter management.* This subcomponent focuses on nature-based solutions and improved urban services to address the environmental and social challenges that contribute directly to the reduced carrying capacity of the river through restoring natural assets and reducing waste in the river. The subcomponent will finance, *inter alia*: (a) carrying out reforestation in the upstream Msimbazi and tributaries; (b) implementing an erosion prevention and urban greening works; (c) constructing sediment management infrastructure and provision of equipment for sediment management in the middle and upper Msimbazi basin; (d) implementing a community-led solid waste management and litter control program; and (e) financing improved solid waste collection/recycling contracts through performance-based payments schemes.

9. ***Component 2:*** **Preventative** ***resettlement (US$30 million + US$25 million of agreed additional financing).*** This component finances the preventative resettlement of low-income flood-prone communities in the Lower Msimbazi River Basin and Project-related displaced persons, in compliance with the World Bank Environmental and Social Framework (ESF).

10. Most of the resettlement is in flood-prone areas in the lower Msimbazi floodplain. As of June 16, 2026, an estimated 4,332 households have been identified in this area, including 2,692 households who owned structures and other non-land based assets on land; 68 PAPs who were previously resettled to Mabwepande but returned to the floodplain; and 1,177 households who either had submerged properties from flooding events prior to the Project's cut-off date or who had been previously resettled without compensation under a Government of Tanzania-led process carried out in earlier in 2015/2016 (legacy resettlement); and 395 tenants. All these are covered under the RAP in accordance with their respective category of tenure. Also included in the Lower Msimbazi RAP, but to be resettled under a subsequent phase whose resettlement is yet to start implementation, are 314 households impacted by the terraces and associated infrastructure, and 394 transport agents, traders from Kigogo market, and garage owners.

- *Subcomponent 2.1: Resettlement Compensation.* This component finances, *inter alia*: carrying out preventative resettlement of low-income flood-prone communities in the lower Msimbazi valley and Project-related displaced persons, and implementing the Resettlement Policy Framework (RPF) and RAPs for the Project, including the acquisition of land and the delivery of entitlements to displaced persons, including in-situ and in-kind resettlement compensation or assistance.

  The compensation and other support for which PAPs are eligible is specified under the Lower Msimbazi RAP, based on the entitlements provided in the RPF, and are consistent with the ESF, including Environmental and Social Standard 5 (ESS5).

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Persons who will be relocated from the flood-prone area will be provided in-kind options designed to reduce the likelihood of their returning to similar conditions in flood-prone areas. In particular, the options provided aim to minimize livelihood disruption and provide secure land in non-flood-prone areas. A structured consultation and outreach program has provided the PAPs with informed choices and more generally is supporting the process of implementation of the RAPs.

- *Subcomponent 2.2: Livelihood Restoration.* This subcomponent finances, *inter alia,* implementing the livelihood restoration program (LRP) provided for in the RPF and RAPs. The LRP will be implemented in parallel with PAP compensation and relocation. Ninety percent of PAPs to be resettled from flood-prone areas earn livelihoods in the informal economy, largely small-scale trading and vending, and livelihoods are dependent on their current location near the Dar es Salaam central business district. The LRP complements the relocation of households and ensures that PAP livelihoods are maintained at, or above, pre-Project levels. This subcomponent finances consultant services, equipment and works, and training related to the implementation of this program.

11. ***Component 3: Strengthening institutions for resilient urban development (US$8.10 million).*** This component focuses on governance reforms, strengthening new and existing institutions, building capacity, and facilitating coordination for management of the Msimbazi River Basin, including the investments and assets created under the Project, the surrounding urban area, and the watershed.

- *Subcomponent 3.1: MSPA Institutional Strengthening.* This subcomponent supports the formation of the institutional arrangements and management plans for the Msimbazi Special Planning Area (MSPA) and executing the land use planning, real estate transactions, city park, and future development.

- *Subcomponent 3.2: Msimbazi River Basin Management Institutional Strengthening.* This subcomponent supports a multi-agency and stakeholder approach to manage the flooding and erosion and broader sustainability of the Msimbazi River Basin.

- *Subcomponent 3.3: Local Government Authorities Institutional Strengthening*. This subcomponent provides institutional strengthening of the Dar es Salaam Local Authorities to support service delivery, urban planning, and development controls, in support of their associated roles in the MSPA, surrounding urban areas, and watershed.

12. ***Component 4: Project Management (US$6.9 million).*** This component finances the direct costs of management and operation of the Project to ensure smooth delivery and compliance with World Bank policy and guidelines.

13. ***Component 5: Contingent Emergency Response Component.*** This component finances, *inter alia,* provision of immediate response to an Eligible Crisis or Emergency, as needed. This component enables rapid response to eligible emergencies and disasters

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caused by natural and man-made events by providing contingent financing. In September 2024, the component was activated in response to nationwide floods. It financed rehabilitation of roads and bridges for US$30 million.

Project Status

14. The Project is on track to achieve its development objective. Cumulative disbursements stand at US$116 million (55 percent of the total IDA financing) with most major contracts across the core investment components signed, and overall implementation progressing across infrastructure, resettlement, and institutional strengthening activities.

15. Under Component 1 (Msimbazi River Basin Development Infrastructure), works on the Jangwani Bridge are underway, with physical progress at 34 percent. The contract for the Lower Msimbazi earthworks was signed in April 2026, and works will proceed after resettlement compensation in the lower Msimbazi floodplain has been completed. The development of conceptual and detailed designs for the flood retention area, park, and urban redevelopment zones is ongoing. Reforestation and greening interventions in parts of the basin have started and preparatory work for sediment management and erosion control measures is ongoing.

16. Under Component 2 (Preventative Resettlement), implementation of the Lower Msimbazi RAP has advanced substantially, with the majority of PAPs in the lower Msimbazi floodplain compensated and resettlement activities largely completed. Livelihood restoration activities are underway with 1,365 PAPs registered.

17. Under Component 3 (Strengthening Institutions for Resilient Urban Development), technical assistance and establishment of institutions are progressing. Through legal, institutional, and planning support for the establishment of the MSPA, the institutional structure was endorsed by the Steering Committee, and the next step is formal establishment.

18. Component 5 (Contingent Emergency Response) was activated in September 2024 after nationwide floods. Ten rehabilitation works (6 bridges, 2 concrete box culverts and 2 stormwater drains) in Dar es Salaam are being financed. Progress is approximately 95 percent, and the component will close in September 2026.

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IV. MANAGEMENT'S RESPONSE

19. Management has carefully reviewed the concerns raised in the Request for Inspection. In Management's view, the ongoing resettlement process under the Project is consistent with the approved RAP and applicable Bank policy requirements. No demolition, site clearance, or displacement has or will take place in any area prior to provision of entitlements to PAPs, in accordance with ESS5 and the approved RAP.

20. ***The Request appears to be based on an incorrect understanding of the documentation and requirements applicable to the Project's resettlement program.*** It does not provide evidence that the entitlements and the process of determining eligibility or the delivery of these entitlements are inconsistent with the approved RAP or ESS5. ***Two misunderstandings appear to be central to the Request for Inspection:***

- The incorrect assumption that under ESS5 all PAPs are entitled to compensation at replacement cost for the land they occupy, regardless of their legal rights or status with respect to that land; and

- The incorrect assumption that all PAPs residing in the area hold valid ownership or recognizable claims to the land, when in fact most PAPs do not hold such documentation. Some PAPs held expired recognizable documents, for instance, while others held documents that were issued to deceased relatives with unresolved inheritance proceedings.

21. Management will work with the Borrower to proactively address these misconceptions, which point to the need to further intensify outreach and information materials about RAP entitlements and differences in tenure. Moreover, Management will reinforce the message that it has no role in adjudicating legal disputes regarding the validity of such tenure documentation, which will need to be adjudicated by Tanzanian courts of law.

22. ***The main source of misunderstanding relates to the entitlement to land compensation under ESS5.*** Under ESS5, PAPs who have legal rights, or a recognizable claim, to land under national law, are entitled to receive in-kind provision of alternative land of comparable size and location, or compensation for that land loss at replacement cost[2]. Those who do not have such rights or recognizable claims to the land they occupy or use are not entitled to compensation for loss of land. Instead, PAPs without legal rights or recognizable claims to land are provided compensation at replacement cost for assets other than land, and resettlement assistance in the form of in-kind resettlement options or cash to allow them to obtain land with security of tenure at an alternative site. Consistent with ESS5, the RAPs under the Project provide for both kinds of support, based on each PAP's circumstances.

[2] Tanzania's land tenure system provides a range of legal rights or recognized claim to land including: (i) Granted Rights of Occupancy (GROs); (ii) Customary Rights of Occupancy (CROs); and (iii) Derivative Rights. Applicable to the Project and the Project area is the GRO.

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23. The majority of the Requesters' claims are based on the mistaken assumption that compensation for land at replacement cost should be provided to *any PAPs*, including those who have no legal rights or recognizable claims to the land. It appears that based on this misunderstanding the Requesters assert that resettlement under the Project is not consistent with ESS5 or the Project's RAPs. Based on the Request, Management considers that this confusion stems from a misunderstanding of these entitlements, exacerbated by a lack of understanding of the various steps in the resettlement process that are explained in the RAP, such as application of the eligibility criteria, (including those related to land rights outlined here), the corresponding entitlements and determination of the final entitlements and allowances provided to each PAP. This information was included in the Lower Msimbazi RAP and has been (and continues to be) communicated through consultation, the process of confirmation of entitlements with PAPs, and responses to complaints through various grievance channels. It was also further clarified in the updated 2023 RAP.

24. ***Management acknowledges that there was an error in document disclosure.*** When the Project Implementation Unit (PIU) launched its new website in April 2024, a draft version of the 2022 RAP was posted rather than the current, updated version approved and disclosed in 2023. It is this version of the 2022 RAP that appears to have been the source of the excerpts attached to the Request for Inspection, with some edits included as part of the Request.[3] The Government's disclosure of the draft 2022 RAP was recently identified by Management, and it has been corrected. The governing 2023 Lower Msimbazi RAP, however, remained available on the Bank's website throughout this period. Management has confirmed that the differences between the excerpts of the RAP presented in the Request and the 2023 RAP are not material to eligibility or entitlements under the RAP and do not affect the responses to the Request for Inspection. The updates in the 2023 Lower Msimbazi RAP provided additional information that was not included in the 2022 version, namely the results of a process of validation and disclosure of entitlements, due diligence on land ownership, and the elaboration of the valuation methodology. This disclosure of the draft 2022 RAP may partly explain some of the confusion that is apparent in the Request for Inspection. The issue has been corrected, and the Borrower will carry out additional outreach to the communities concerned, as explained below in paragraph 49.

25. ***Management notes that most residents within the resettlement area do not hold legal rights or a recognizable claim to land they occupy or use under national law. Instead, they either possess no documents at all to demonstrate their right to occupy or use the land, or hold documents that had expired as of the Lower Msimbazi RAP cut-off date.*** In some cases, documents presented by PAPs were issued to deceased relatives, and

[3] The RAP excerpt attached to the Request includes revisions that have changed both the meaning and the structure of the original text approved by the Bank. In the original version, the provision reads: *"a) Cash compensation: for the developments on the land such as structures, provide cash compensation at replacement costs."* In this formulation, "Cash compensation" is part of the same sentence and directly relates to compensation for developments on the land, such as structures. In the excerpt attached to the Request, however, a line break was inserted after "Cash Compensation," resulting in the text appearing as: *"a) Cash Compensation."* followed by: *"b) for the developments on the land such as structures, provide cash compensation at replacement costs."* This formatting change makes "Cash Compensation" appear to be a standalone heading for the entire section rather than the beginning of a specific provision. The original wording therefore remains the only correct text.

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inheritance proceedings may be pending; in other cases, residents have been unable to renew them. The lower Msimbazi floodplain was classified by the Government decades ago as hazardous, a legal designation which, among other things, prohibits settlement or construction on the land, and renders it devoid of economic value. The vast majority of the PAPs in the lower Msimbazi floodplain (96 percent) have been offered and, following their acceptance, provided with an entitlements package for non-land assets and resettlement assistance that, among other things, would allow them to acquire land with secure tenure at an alternative site, consistent with ESS5 and the Lower Msimbazi RAP. Some residents who have approached the GRS and may be involved in this Request, dispute the Government's determination regarding the validity of their land occupancy or use documents (e.g., whether their Certificate of Right of Occupancy or Residential License should have automatically renewed prior to the Lower Msimbazi RAP cut-off date). The Bank, however, cannot adjudicate such questions of domestic law or land tenure status. For this reason, the Bank has advised these individuals that any challenge to the Government's decisions in this regard should be pursued through the appropriate administrative or judicial review processes in Tanzania. In addition, consistent with Bank policy, the Bank has advised the Government of Tanzania that, where entitlement claims remain subject to administrative or legal review, the corresponding entitlement amounts should be placed in escrow accounts pending the outcome of those proceedings.

26. ***A minority of PAPs (18) are residents in the flood-prone area who hold legal rights, or a recognizable claim, to land under national law through valid and unexpired Certificates of Right of Occupancy, Residential Licenses, or Letters of Offer.*** In accordance with ESS5, the Lower Msimbazi RAP specifies that these PAPs are entitled to compensation for land at replacement cost. A process is ongoing to determine the valuation of their land at replacement cost, consistent with ESS5. This exercise is complicated because these land parcels have no economic value under law since they are located within the lower Msimbazi floodplain, which was designated as hazardous land unfit for habitation or construction in the 1979 Dar es Salaam Master Plan (see Footnote 5 in Annex 1). This legal characterization of the Msimbazi River Basin as a hazardous area was confirmed in an opinion by the High Court of Tanzania. In Land Case No. 151 of 2012, the Court recognized that the entire Msimbazi River Basin constitutes hazardous land that is unsuitable for human settlement. To compensate these PAPs for land at replacement cost consistent with ESS5, the Government and the Bank agreed that valuation for these residual cases would be based on a methodology that looks at the replacement cost of comparable alternative land in Dar es Salaam outside the lower Msimbazi floodplain. It was further agreed that these PAPs would be offered either replacement land with comparable characteristics or the cash equivalent of such land, applying the replacement cost valuation method, consistent with the Lower Msimbazi RAP and ESS5. The Government refers to this as "Land-Based Livelihood Restoration Assistance (LBLRA)."

27. ***The Request does not identify specific individual cases that would allow Management to verify and respond to the allegations raised.*** Given the anonymity of the Requesters, Management is unable to verify the specific claims attributed to the 412 individuals referenced in the Request. Nevertheless, the Project has engaged with a subset of PAPs through approximately 18 cases submitted through the Grievance Redress Service (GRS), some of which may involve individuals represented in the Request. As a result,

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Management's response is necessarily limited by the absence of detailed information and focuses instead on the applicable entitlements, the relevant documentation, and the systems in place to implement the RAP.

Project Resettlement Activities

28. ***The Project involves a significant preventative resettlement program targeting people residing in the lower Msimbazi floodplain.*** The resettlement is characterized as "preventative" because its primary aim is to protect the population in those locations from recurrent flooding and environmental hazards, while also enabling the infrastructure works that are central to the Project's development objectives. The Request for Inspection refers to the resettlement activities in the lower Msimbazi floodplain.

29. The Project identifies 2,692 PAPs who owned structures as of the Project's cut-off date in the lower Msimbazi floodplain entitled to compensation at replacement cost for loss of non-land assets (structures, trees, etc.) and resettlement assistance.[4] This Management response focuses on these 2,692 PAPs. As of early June 2026, resettlement of these 2,692 PAPs is 96 percent complete, with entitlements having been provided to 2,583 PAPs. The cases of the remaining 109 PAPs involve legally complex situations, including unresolved land ownership disputes, estate administration proceedings, valuation disagreements, slow delivery of in-kind compensation or pending grievances under the Project's Grievance Redress Mechanism (GRM). These complex situations are being addressed in accordance with Bank policy requirements as part of regular Project implementation and supervision.

30. A separate resettlement process and RAP cover the site of the new Bus Rapid Transit (BRT) Depot, located approximately 7 kilometers from the lower Msimbazi floodplain. The relocation of the BRT Depot is covered under Component 1 and follows its own dedicated RAP, which is subject to ESF standards. The ongoing Jangwani Bridge works were confirmed to not result in resettlement, as outlined in the environmental and social impact assessment undertaken for this work. The BRT Depot and Jangwani bridge works are not referred to in the Request for Inspection.

Resettlement Instruments

31. The Project's resettlement activities are governed by a hierarchy of instruments aligned with ESS5 and applicable Tanzanian law. Three primary instruments are in place:

- *Resettlement Policy Framework (RPF):* Dated February 2022 and disclosed in March 2022, the RPF establishes the overarching principles, legal framework, eligibility criteria, and entitlement structure applicable to all phases of the Project. Together with ESS5, it serves as the framework document for the development of subsequent, site-specific RAPs.

[4] Please note that the Request uses incorrect figures for the number of PAPs, citing 2,775 and 2,582. The correct figures are 2,692 and 2,583, respectively.

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- *Lower Msimbazi RAP:* ***This is the primary and most consequential resettlement instrument, covering the largest concentration of PAPs, who are located in the lower Msimbazi floodplain.*** In addition to the PAPs in the floodplain, it also covers those PAPs affected by the planned works for redevelopment of the lower Msimbazi valley as well as PAPs affected by legacy resettlements. The resettlement for both of the latter groups will be implemented in subsequent phases of the Lower Msimbazi RAP. The RAP cut-off date for the PAPs in the lower Msimbazi floodplain (referred to throughout this Management Response as the Project cut-off date) was November 10, 2021.

  Due to the complexity of and multi-phase approach to its implementation, the Lower Msimbazi RAP has and will continue to be updated as important information becomes available that warrants an update. The initial version of the RAP, dated March 2022, was approved by the Bank and disclosed at Project appraisal in August 2022. It was superseded by the current version that is dated October 2023, after Project effectiveness, and was approved by the Bank and subsequently disclosed in December 2023. The updates that resulted in the 2023 RAP reflect additional work that had been done as part of implementation to ensure accurate delivery of entitlements, including validation of results from activities that were hampered by the rains during preparation of the initial RAP. The eligibility criteria and entitlement matrix did not change between the 2022 and 2023 versions. The 2023 RAP includes further validation of assets and entitlements by the Government and verification by PAPs as well as more detailed information on the valuation methodology. It also benefited from review of land ownership documentation provided by PAPs as part of the process of disclosure of entitlements and through the GRM.

- *BRT Depot RAP:* This separate RAP covers the area required for construction of the BRT Depot, dated November 2023, and disclosed in December 2023.

32. Together, these three instruments and ESS5 requirements define the Project's approach to land acquisition, compensation, and livelihood restoration, and establish the legal basis for how different categories of PAPs are treated depending on their tenure status. The Request for Inspection refers to the ongoing resettlement of PAPs in the lower Msimbazi floodplain, which is covered by the 2023 Lower Msimbazi RAP.

Entitlements, Compensation, and Resettlement Assistance

33. Entitlements under the Project are differentiated based on a PAP's land tenure status as of the applicable cut-off date, consistent with both ESS5 and Tanzanian law.

- *Formally Recognized Occupants:* PAPs who hold documentation demonstrating legal or recognizable rights to land in the Project area, valid as of the Lower Msimbazi RAP cut-off date, are entitled to cash compensation at full replacement cost for their land, or, alternatively, to in-kind provision of alternative land of comparable size and location. Given that the lower Msimbazi floodplain was declared a hazard zone by the Government decades ago, the existence of land rights

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documentation that is legal or recognizable under national law in this area is extremely limited. Only 18 PAPs in this category (see paragraph 26, above) have been verified as of June 5, 2026.

34. *Informal Occupants (Squatters):* Most PAPs in the lower Msimbazi floodplain are informal occupants who settled in the hazard zone and did not hold legal rights, or a valid recognizable claim to land they occupied or used as of the cut-off date. In accordance with ESS5, they are not entitled to land compensation. They are, however, entitled to a resettlement assistance payment specifically designed to help them acquire land with security of tenure outside the lower Msimbazi floodplain. This assistance takes the form of a lump sum payment of TZS 4 million (ca. US$1,500), an amount that has been calculated based on reference land values using a market analysis of land prices in Dar es Salaam. PAPs who did not hold legal rights or a recognizable claim to land are entitled to receive this payment *in addition to* any other entitlements for which they may be eligible, such as compensation for assets other than land and resettlement assistance as explained below. Management notes that the Request appears to confuse this lump sum assistance[5] with compensation at replacement cost for loss of land.

- *Universal Asset Entitlements (All relevant PAPs):* Regardless of their land tenure status, all PAPs are entitled to compensation at full replacement cost without depreciation for any lost or damaged non-land assets they own (structures, crops, and trees) on the land and improvements to the land. Additional resettlement assistance is also provided, including a moving allowance, a disturbance allowance (typically set at 7 percent of the value of compensation provided for non-land assets), and an accommodation allowance of up to 36 months for PAPs during the transition period. For PAPs losing business income, an allowance calculated on the basis of net monthly profit is provided for a period of up to 36 months.

- *Livelihood Restoration Program:* As part of the Lower Msimbazi RAP, a Livelihood Restoration Program (LRP) has been developed and is being implemented in parallel. As of May 2026, 1,365 PAPs have participated in LRP-related engagements, which are designed to restore or improve the income levels and livelihoods of affected households beyond the transition period.

35. The Requesters' claims, accompanied by Management's detailed responses, are provided in Annex 1. Below, Management responds to specific issues raised in the Request in more detail.

Alleged Application of Depreciation to Valuation of Assets

36. ***The Lower Msimbazi RAP valuation methodology explicitly excludes depreciation of structures and other non-land assets.*** While the Request alleges such depreciation, no specific information or evidence was provided demonstrating that depreciation was applied in the valuation or compensation of structures, such as valuation

[5] Also referred to as "flat rate" payment.

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reports, compensation schedules, or signed compensation agreements reflecting depreciation deductions. Management is not aware of any such cases.

37. The Lower Msimbazi RAP explicitly provides that, in determining replacement-cost valuation, depreciation of structures and assets must not be considered (Lower Msimbazi RAP Section 7. Assets Inventory and Valuation).

38. Management will reconfirm with the PIU that no such depreciations are applied in the context of the RAP valuation, as this would be inconsistent with the requirements of the Lower Msimbazi RAP or ESS5. Any such affected PAP should approach the PIU or submit a complaint to the Project's GRM so this can be addressed and corrected.

Grievance Redress Mechanism

39. Grievances under the Project are being actively managed through the Project's GRM in line with procedures outlined in the Lower Msimbazi RAP. The GRM has received 826 complaints as of June 5, 2026, of which 91 percent (753) have been resolved. The remainder are being processed and addressed.[6] The GRM has been active since Project implementation started. Concerns that are recorded in the GRM are reviewed case by case by the PIU in a timely manner. The Bank monitors the efficacy of the GRM during frequent periodic implementation missions.

RAP Disclosure

40. During the preparation of this Management Response, Management realized that the Government's Project website had published a draft 2022 RAP rather than the governing 2023 version. The World Bank's external website correctly hosted the current, October 2023, version throughout this period. However, the version of the RAP referenced in the Request does not correspond to either the approved and disclosed 2022 version or the approved and disclosed October 2023 version available on the World Bank's website.

41. The practical consequence of this was that the Requesters and potentially other stakeholders may have referenced outdated documentation when forming their understanding of entitlements to compensation and resettlement assistance. Several excerpts cited in, or annexed to, the Request appear to have been taken from the 2022 draft RAP. These excerpts contain edits that are not present in any approved or disclosed version of the RAP, including, for example, the bolding of key words or phrases and formatting changes that alter the structure of sentences and, consequently, their meaning. This version contained less precise language under the valuation section and entitlement matrix. Further, it did not include the results of activities undertaken during 2023, such as the validation and verification of entitlements and valuations, which benefited from complaints and feedback from the PAPs, or the results of due diligence on land ownership documents.

[6] The GRM has recorded complaints from PAPs regarding compensation amounts, including concerns that land was not adequately compensated. A number of these cases have since been resolved through the GRM, while others remain under review and may need to be referred to Tanzanian courts for final adjudication.

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42. While the entitlements matrix and eligibility criteria did not change between the 2022 and 2023 RAPs, the 2023 RAP includes additional information on the valuation methodology and the in-kind resettlement options offered to PAPs. The valuation section also provides clarifying language, repeating what was outlined in the entitlement matrix; that land valuation at replacement cost is not applicable to those without legal or recognizable land rights.

43. Importantly, Management confirmed that the extensive stakeholder engagement carried out both during preparation of the Lower Msimbazi RAP, as well as during its implementation, has consistently conveyed information on the eligibility criteria and entitlements due to informal occupants of the Msimbazi floodplain. The Government's disclosure of a draft 2022 Lower Msimbazi RAP therefore did not materially alter the eligibility criteria and entitlements to compensation and resettlement assistance or the outcomes for PAPs, per ESS5 and the Bank approved RAPs, and as communicated to them throughout the Lower Msimbazi resettlement process. However, if the various sections and process of resettlement were not read in context or otherwise not fully understood, it may have contributed to confusion and misinterpretation of the Project's resettlement approach.

44. On June 9, 2026, the Bank formally requested the Government to remove the draft 2022 RAP from the Project website and replace it with the updated 2023 version, approved by the Bank. As of that same date, the 2023 RAP was made publicly available on the Government's Project website.

45. Beyond the immediate corrective action already undertaken, Management is committed to additional measures to further strengthen transparency and reinforce awareness among PAPs in the lower Msimbazi floodplain regarding their entitlements under this resettlement process (with a focus on those without valid land documentation). This includes continued sensitization of PAPs on the contents and applicability of the correct RAP prior to the commencement of civil works, a planned second update to the Lower Msimbazi RAP to incorporate the latest implementation status and valuation process updates, and the engagement of a third-party consultant to conduct an independent audit of RAP implementation and compliance.

Ongoing Resettlement Process

46. As of June 2026, the resettlement process for the lower Msimbazi floodplain under the Lower Msimbazi RAP is still active and ongoing. Management considers that the resettlement process has been conducted in accordance with the approved Lower Msimbazi RAP and the World Bank's ESF. The high completion rate for provision of entitlements (96 percent), the functional GRM with a 91 percent resolution rate, and the active engagement of 1,365 PAPs in the LRP collectively support this assessment.

47. For the 109 unresolved entitlement cases, the Government will place funds (consistent with the Lower Msimbazi RAP entitlement matrix) in escrow accounts. This mechanism, which is consistent with ESS5, ensures that compensation remains available even as civil works eventually progress in other areas, and that no displacement occurs without prior financial provision.

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48. Under the Project, no demolition, clearance, or physical displacement may occur in any area of the Project until after entitlements have been provided to eligible PAPs, or funds have been formally secured in escrow for cases under active legal dispute. This is outlined in ESS5, the RAP and the Environmental and Social Management Plan developed for demolition of compensated structures in the flood plain.[7] This requirement is binding and is not superseded by indicative civil works timelines. Bank supervision missions have reaffirmed with the Government that the resolution of all outstanding compensation cases is a prerequisite for the initiation of construction activities in affected areas of the lower Msimbazi floodplain. While continued diligence is required for the remaining cases, in Management's view the overall resettlement process for the Lower Msimbazi RAP is consistent with ESF standards.

Actions

49. ***Management acknowledges that, while the Lower Msimbazi RAP provides a robust entitlement package, both the RAP document and its entitlement framework are complex and may not be easily understood by all affected stakeholders.*** This complexity was compounded by the scale and phased approach of the Lower Msimbazi RAP, and the application of Bank policies, including the need to develop an appropriate solution for legal occupants of hazardous land, given the legal and policy considerations involved. Despite the continuous consultation and stakeholder engagement efforts that have been made during Project preparation and implementation, the Request highlights the need for additional efforts to communicate and explain RAP eligibility criteria and entitlements, including clarifying the different types of entitlements.

50. To address these concerns, Management will work with the Borrower to undertake the following steps prior to the commencement of civil works:

- ***Carrying out an enhanced, targeted outreach plan****:* Management will work with the Government to develop and implement an enhanced, targeted outreach action plan to lower Msimbazi floodplain PAPs focused on eligibility categories, entitlements for each category (particularly for those PAPs who informally occupy land and do not possess valid land documentation), LRP implementation, Project implementation progress, and grievance redress procedures and access points. This plan will be in addition to the ongoing consultation and communication efforts.

  Management will support the Government to undertake another round of systematic and comprehensive re-engagement and outreach efforts targeting the lower Msimbazi floodplain PAPs, supported by enhanced and advanced information disclosure, making use of channels most accessible to PAPs, and including Information Education and Communication Materials (IEC) such as brochures. The outreach program will include different media, such as community meetings, one-on-one PAP clinics for grievance resolution, sensitization sessions for grievance

[7] The "Msimbazi Basin Development Project Environmental and Social Management Plan for the Demolition of Compensated Structures- Lower Msimbazi," dated April 19, 2024, was disclosed on the World Bank website on May 27, 2024, and simultaneous on the Government website.

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committees and PAP representatives, and public information campaigns through posters, radio, short explanatory or animated videos, and television. These efforts will follow a Bank pre-approved strategy for engagement with the PAPs, aligned with the existing Stakeholder Engagement Plan, which will, among other things, ensure that feedback received and issues raised by PAPs are thoroughly documented and that such feedback is taken into account, where pertinent, in the ongoing RAP implementation. The Government will also undertake targeted outreach to vulnerable PAPs and civil society organizations representing them as required. *The implementation of the outreach plan will be completed by December 2026, and reported on as part of Project implementation reporting.*

A non-technical summary of the Lower Msimbazi RAP in Swahili will be *prepared and disseminated by August 2026* in advance as part of these enhanced outreach and awareness raising efforts targeting lower Msimbazi PAPs. A short video on the RAP and its entitlements will also be prepared to facilitate outreach efforts.

Upon completion of RAP implementation, the Government will continue planned outreach activities related to the civil works phase, for which a tentative plan has already been prepared that will be further refined as needed.

- ***Third Party Audit and Monitoring of RAP Implementation.*** Management will support the Government in the recruitment of an independent third-party monitor to undertake an audit of RAP implementation. The Bank is currently reviewing the Terms of Reference for the engagement of this consultant. The assignment will include: (a) an independent assessment of the implementation of the approved RAP; (b) identification and documentation of implementation gaps; (c) evaluation of the GRM, its functioning, and areas that require strengthening; and (d) assessment of LRP implementation and PAP livelihood outcomes. The third-party monitor will prepare a comprehensive, evidence-based audit report, expected to start as soon as RAP implementation is completed. *A draft audit report is expected to be available by December 2026.*

  Update of the Lower Msimbazi RAP. Management will support the Government in undertaking a second update of the Lower Msimbazi RAP to reflect the current implementation status and incorporate updated valuation approaches applied to PAPs with legal and recognizable land rights in areas declared hazardous, as well as more granular information on the PAPs affected by the infrastructure works as part of the redevelopment of the Lower Msimbazi valley.

  The Government will also undertake consultations with PAPs and broader stakeholder engagement during the Lower Msimbazi RAP update process to enhance understanding and ensure transparency. *These will be recorded in the updated version of the RAP that is planned to be completed by December 2026.*

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Conclusion

51. Management believes that the Bank has correctly applied its policies and procedures applicable to the Project. In Management's view, the Bank has also followed the policies and procedures applicable to the matters raised by the Request. As a result, Management believes that the Requesters' rights or interests have not been, nor will they be, directly or adversely affected by the alleged failure of the Bank to implement its policies and procedures.

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ANNEX 1
CLAIMS AND RESPONSES

No.	Claim	Response
1.	**STATEMENT OF HARM.** Affected persons have suffered loss of land, inadequate compensation, and disruption of livelihoods due to improper implementation of the RAP due to incomplete and non-compliant compensation. The evidence provided demonstrates that the compensation process did not comply with the approved RAP, particularly regarding land compensation and application of flat rate principles, leading to material. The World Bank financed project has caused significant harm to us and our community through the improper implementation of the compensation and resettlement process. In particular, some affected persons have not been compensated for their land despite their properties being identified during valuation process. In several disclosure forms, the section relating to land compensation was left blank, indicating that no compensation or paid for the land. As a result, affected households have lost their land, building rights and livelihoods without receiving lawful compensation as required under the Resettlement Action Plan (RAP) and applicable standards. This has created serious economic hardship, insecurity, and loss of the property for the affected families. Copies of the disclosure forms showing that the land compensation section was not filled are attached as evidence.	***In Management's view, the ongoing resettlement process under the Project is consistent with the approved RPF, Lower Msimbazi RAP and Bank policy requirements. The Request appears to be based on an incorrect understanding, reading and/or interpretation of the documentation and requirements applicable to the Project's resettlement, and does not provide evidence that the entitlements and the process of determining eligibility or the delivery of these entitlements are inconsistent with the approved RAP or ESS5.*** **A. Overview of Project Resettlement Instruments** The RPF, dated February 2022, was disclosed on March 23, 2022. It covers potential resettlement associated with all areas and phases of the Project, and it establishes the principles, entitlements and eligibility criteria, organizational arrangements, and processes that guide the preparation of site-specific RAPs and their implementation in line with ESS5 on Land Acquisition, Restrictions on Land Use and Involuntary Resettlement. Two RAPs covering different geographical areas have been prepared to date in line with ESS5, the Environmental and Social Commitment Plan and the RPF, and have been disclosed on the Bank's website, namely: 1. *The RAP covering the resettlement from the lower Msimbazi floodplain* and those outside it but affected by the associated infrastructure ("The Lower Msimbazi RAP"). The implementation of this RAP is phased. The first phase for PAPs in the lower Msimbazi floodplain is under implementation, being the area of highest priority under the Project and where the largest number of people to be resettled were located. The second phase (that has yet to start) includes the PAPs affected by the associated infrastructure; and 2. *The RAP covering the area of the BRT Depot (BRT Depot RAP)* located approximately 7 km away from the lower Msimbazi floodplain. The BRT Depot RAP, dated November 2023, was disclosed on December 6, 2023. It is available on the Bank's website and on the website of TANROADs, the Project Implementing Unit (PIU) implementing the transport component.[1]

[1] The Environmental and Social Impact Assessment of the Jangwani Bridge (June 2024, disclosed on the World Bank website on July 14, 2024, and also available on the Government's Project website) confirmed the bridge works will not result in resettlement since the design of the bridge as well as the approach roads has utilized the existing right of way as much as possible.

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No.	Claim	Response
		1. The Lower Msimbazi RAP The first version of the Lower Msimbazi RAP, titled "Draft Resettlement Action Plan and Livelihood Restoration Program," was dated March 2022 and was approved by the Bank and disclosed on the Bank's website on August 10, 2022. In the Lower Msimbazi RAP, the cut-off date for PAPs in the lower Msimbazi floodplain is November 10, 2021. This RAP was revised and updated in 2023. This updated version, which is the current version of this RAP, is titled "Draft Resettlement Action Plan and Livelihood Restoration Program" and is dated October 2023. It was approved by the Bank and disclosed on the Bank's website on December 6, 2023. This update of the RAP includes the results of the process of verification, valuation, and disclosure of entitlements for PAPs in the lower Msimbazi floodplain and other updates from implementation. The cut-off date of November 10, 2021, was not changed. The 2023 update also reflects the completion of the census and inventory of PAPs affected by the associated infrastructure, establishing the cut-off date for this group, for whom implementation would start in the second phase of the RAP. It is common practice to update RAPs under a given project, consistent with the RPF and ESS5, particularly for complex resettlement processes. Updates reflect the implementation process and can include changes in the scope of the intervention, in design, refinements in the entitlement matrix, and/or broader changes consistent with the adaptive risk management approach. The updates to the Lower Msimbazi RAP were made after a process of validation of the census and inventory, and a valuation and disclosure process for the PAPs in the lower Msimbazi floodplain, and included, for example, updates from the detailed methodology that was developed and applied to valuation, the results of valuations, further verification of PAP eligibility for entitlements and feedback from the process of initial disclosure of entitlements and the GRM, including land ownership claims, due diligence on land ownership documents, PAP preferences for in-kind or cash compensation and resettlement assistance, as well as updated information from the census and inventory for the associated infrastructure for the redevelopment of the lower Msimbazi valley. The update addressed the previously identified need for verification of the census and inventory for the lower Msimbazi floodplain PAPs, which was noted but could not be addressed in the original Lower Msimbazi RAP (due to time limitations and the challenging flood conditions prevalent at the time of data collection) and allowed due diligence of presented land documents to be reviewed. The Lower Msimbazi RAP update followed an intensive validation exercise conducted between March and October 2023, after the

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No.	Claim	Response
		initial disclosure of entitlements in February 2023 generated inquiries and complaints that the Government systematically reviewed and addressed, resulting in revised valuations. More details on the consultation process that took place to inform the update of the RAP are included in Item No. 11 and Annex 2. ***2. Disclosure of the 2023 Lower Msimbazi RAP*** The 2022 and the updated 2023 versions of the Lower Msimbazi RAP were approved by the Bank and disclosed on the Bank's website in a timely manner. After approval, the 2023 version was also disclosed on the Government's website, as confirmed in the Bank's internal system. In preparing this response to the Request for Inspection, the Bank became aware that the current version of the RAP, i.e., the 2023 Lower Msimbazi RAP, was not available on the Government website. Instead, a draft of the 2022 Lower Msimbazi RAP was disclosed by the Government on its newest Project website. It would appear that the excerpts included in the Request are extracted from that 2022 RAP, with some observable edits (e.g., bolding of key phrases or words and formatting). The Bank has confirmed that the differences between the 2022 RAP (Section 8, Table 8.1) and the 2023 RAP (Section 8, Table 8.1) are not material to eligibility or entitlements and do not affect the responses to the Request.[2] Upon learning of the presence of a draft 2022 RAP in the Project website, the Bank requested the Government to remove it, and to disclose the current 2023 RAP in its place. As of June 9, 2026, the 2023 RAP is available on the Project website. Although a draft version of the 2022 RAP was posted on the Government's website until June 8, 2026, the entitlement matrix governing the compensation and resettlement assistance for PAPs has remained consistent since the RAP was first approved in 2022 and subsequently disclosed on the Bank's website. Furthermore, dissemination of the entitlement matrix and continuous and ongoing consultations with affected PAPs explaining the rationale for preventive resettlement, entitlements and eligibility for compensation and resettlement assistance, and the associated validation and disclosure processes, have been integral to the

[2] The draft 2022 RAP disclosed by the Government included additional information on the valuation of "registered" land, reflecting the fact that areas with affected infrastructure (mostly located on land with titles) had begun to be surveyed at that stage, as well as more detailed information on the "in-kind" options in the entitlement matrix. The extracts presented by the Requesters are the same as that version, with some edits added, including bolding of words and formatting. Notably in the entitlement matrix for "squatters," a separate line was added for the words "Cash Compensation," which were originally included on the line related to compensation for structures.

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		Project's design, preparation, and implementation and have continued since the RAP's first disclosure in 2022. The Government has had ongoing communication with stakeholders, has supported and organized consultations with them, and has maintained an active GRM (see below response to Item 11 for details), to ensure that PAPs are duly informed of the content and applicability of the approved Lower Msimbazi RAP prior to the commencement of any civil works on the land subject to resettlement. Throughout the process, PAPs have had and continue to have multiple channels to engage with government officials and ask for clarifications. This has been considered essential by both the Government and the Bank for successful implementation of this complex RAP. Management notes that the Government is once again planning to update the Lower Msimbazi RAP. This second update of the RAP will include the updated status of implementation of the resettlement process over the past three years, relevant updates to the valuation process, and next steps to complete implementation. **B. Lower Msimbazi RAP** The Lower Msimbazi RAP outlines the categories of PAPs, their eligibility for entitlements, including compensation and resettlement assistance, and establishes detailed procedures for valuation, disclosure of entitlements, feedback and signing of compensation agreements, grievance redress, and monitoring prior to the commencement of civil works on land subject to resettlement. The Lower Msimbazi RAP was prepared through extensive consultation, including 17 community meetings (see RAP, Section 4), a census and socio-economic survey of PAPs, an asset inventory supported by GIS mapping, and valuation of affected assets. This was followed by disclosure activities at the sub-ward (*Mtaa*) level to confirm asset records and address valuation-related grievances, which informed the determination of entitlements. As explicitly required by the RAP, no construction activities will start on land where resettlement and the provision of entitlements to PAPs have not been completed. Implementation of the Lower Msimbazi RAP began with PAPs in the lower Msimbazi floodplain. There were 2,692 PAPs that owned structures and other assets on land that they informally used or occupied. As of June 16, 2026, entitlements have been provided to 2,583 of these 2,692 PAPs (96 percent completion), mostly compensation at replacement cost for lost structures and packages of resettlement assistance (e.g., disturbance, moving, accommodation allowances, and assistance in the form of a fixed, lump sum payment to allow PAPs to acquire land with security of tenure at an

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		alternative site). The remaining cases are currently under review by the Government, primarily due to issues that include land ownership disputes, estate administration procedures, valuation disagreements, demand for land compensation at replacement cost and pending resolution of grievances. Grievances are being actively managed through the Project's GRM in line with procedures outlined in the Lower Msimbazi RAP. Details on the GRM and the grievances that have been received and addressed under the Project are presented in sections below. **C. Entitlements under the RAP** The entitlement matrix included in Lower Msimbazi RAP Section 8 explains the extent of the entitlements including compensation for land and assets, and resettlement assistance to which each PAP is entitled under the Project. Entitlement packages for PAPs vary according to eligibility criteria outlined in the RAP. [3] ***1. Compensation for Loss of land.*** Different categories of PAPs are defined in the Lower Msimbazi RAP for purposes of determining their eligibility to receive compensation for loss of land at replacement cost. Each PAP was placed in one of the categories below based on their status as of the cut-off-date: (a) "*Individuals who have formal legal ownership rights to land (Rightful Owners)"*[4] are entitled to compensation at replacement cost of the affected land; and (b) Informal occupants, such as individuals who have no ownership rights to land but are using the land (Squatters), are not entitled to compensation for loss of land. Most of the PAPs being resettled from the lower Msimbazi floodplain are informal occupants. This is recorded in Section 5.1.4. of the Lower Msimbazi RAP, "*land ownership,"* which states that "*it should be noted that the flood prone area land ownership is considered illegal by the Government. There are nevertheless*

[3] As part of the Lower Msimbazi RAP preparation, validation, and disclosure process, PAPs were given the choice of delivery of their entitlements through cash or in-kind options as outlined in the entitlement matrix. Section 10.3 of the Lower Msimbazi RAP provides the criteria for offering in-kind compensation to the PAPs. These options were explained to the PAPs in the lower Msimbazi floodplain, and they were provided the opportunity to state preferences; the vast majority chose the cash option. Currently, only seven PAPs have selected the in-kind option. These PAPs are being provided with interim accommodations while the detailed location and design of these in-kind options are being developed with them. Six of the seven PAPs have relocated to interim accommodation. Arrangements are ongoing for the remaining PAP who opted for relocation to a village setting and lacks the national identification documents required to open a bank account to facilitate transfer of relocation allowances.

[4] Those rights would be evidenced by Certificates of Right of Occupancy, Residential Licenses, or Letters of Offer valid and unexpired as of the Project's cut-off date. Under Tanzanian land law, all land is public land "vested in the President as trustee." The Government may issue to a person a certificate of right of occupancy for any period up to 99 years; residential licenses appear to be a type of occupancy document valid up to five years.

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		instances where some PAPs claim to have formal legal documentation." *Land values in the lower Msimbazi floodplain.* Although some land within the Msimbazi Basin was historically allocated through formal administrative processes, planning instruments and later zoning notices have classified much of the area as hazardous and unsuitable for permanent settlement.[5] Under Tanzanian law, land located in such hazard zones holds no commercial value as it is unsaleable under law. However, during RAP implementation, several individuals came forward with documentation pertaining to occupancy rights or rights to use the land issued by relevant local government agencies. In most cases this documentation had expired or had become void by the Project cut-off date. In cases where documents demonstrating the PAPs have legal right or recognizable claim to land were valid and in effect as of the Project's cut-off date, PAPs are treated as formal titleholders, and are entitled to in-kind provision of alternative land of comparable size and location OR cash compensation for the loss of land at replacement cost. Since the land has no value under Tanzanian law, consistent with ESS5, compensation at replacement cost for the loss of land will be made based on the value of a plot of comparable size to the lost land with similar locational characteristics. The fact that there is no "market" for land in the lower Msimbazi floodplain that could provide a basis for formal valuation is recognized in the RAP, Section 7.0. on Assets Inventory and Valuation. The Government will offer either replacement land with comparable characteristics or the replacement cost cash equivalent of such land, applying the replacement cost valuation method, consistent with the requirements of ESS5 for PAPs with legal or legally recognizable claim to land. (The Government refers to this as LBLRA). The process to determine the LBLRA and propose compensation to eligible PAPs is ongoing as of June 5, 2026. PAPs with occupancy documents that were not valid as of the Project's cut-off date are categorized as informal occupants and are not entitled to compensation for land at replacement cost or

[5] The land in the Msimbazi Valley has been officially considered hazardous since the Dar es Salaam Master Plan of 1979, which noted that habitation or construction on "hazard land" is prohibited. Based on a review of available laws, Tanzanian land laws since at least the 1990s have expressly and consistently treated land declared hazardous (which includes among other things wetlands and areas within 60 meters of riverbanks) as by law belonging to the government and unable to be occupied or owned under Certificates of Right of Occupancy, Residential Licenses or other forms of occupancy rights documentation contemplated under law. Similarly, the High Court of Tanzania, in Land Case No. 151 of 2012 relating to land occupancy rights in the same area as that at issue in the Request, referred to the 1979 Master Plan in its opinion and noted that the entire Msimbazi River Basin has since then been legally and scientifically confirmed to be hazardous land that is unsuitable for human settlement and unsaleable under Tanzanian law, which suggests that the 1979 Master Plan's designation of the area in question as "hazard land" had the same legal force as an official and gazetted Government declaration under the published land laws. The same case opinion mentioned and noted the gazetting and publishing of hazard and state ownership declarations (consistent with Tanzanian land laws) of that land since at least 1993.

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		replacement equivalent land, per the RAP and in line with ESS5. In lieu of land compensation they are eligible for resettlement assistance that could allow them to obtain alternative land outside the floodplain with security of tenure. *Status of Compensation for Land as of June 2026* • The majority of PAPs in the Lower Msimbazi RAP for the lower Msimbazi floodplain do not hold legal rights or recognizable claims to the land, i.e., valid and unexpired Certificates of Right of Occupancy, Residential Licenses or Letters of Offer, and hence do not qualify for compensation at replacement cost for the loss of land. This is recognized in the RAP (Section 5.1.4 on Land Ownership). • Only 18 PAPs have thus far presented documentation that the Government has recognized as valid as of the RAP cut-off date to verify their formally issued occupancy rights. The Government is currently determining the amount of LBLRA to which each of these PAPs is entitled, based on the individual characteristics of their lost land plots, following a methodology that has been agreed with the Bank and is consistent with ESS5. The Bank will review the proposed amounts of LBLRA calculated for each PAP to confirm they are reasonable estimates of replacement cost for their plots. • 28 PAPs so far have presented documentation that the Government has deemed invalid or insufficient to demonstrate valid occupancy or use rights to the land as of the Project's cut-off-date. Some of these PAPs are challenging the Government decision in local courts. For these complex cases, escrow accounts are being set up under the Project to ensure that entitlement amounts are available to PAPs once disputes are resolved. ***2. Compensation for assets other than land and Resettlement Assistance***. All PAPs are entitled to a package of compensation for loss of assets other than land and resettlement assistance that is determined according to the PAP's profile: • *Compensation and resettlement assistance for loss of main dwelling structure* – includes cash compensation at replacement cost of the structure and 36 months of accommodation allowance for occupants residing in the structure and reimbursement for unexpired tenancy/ lease periods; for tenants, the amount of deposit or advance paid by the tenant to the landlord and 3 months of accommodation allowance; transport assistance; and 7 percent of the total compensation as disturbance allowance;

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		• *Compensation and resettlement assistance for loss of commercial structure* – includes cash compensation at replacement cost of the structure and 36 months of loss of profit allowance for occupants of the structure; for tenants, reimbursement for unexpired tenancy/ lease periods and the amount of deposit or advance paid by the tenant to the landlord and 3 months of accommodation allowance; transport assistance; and 7 percent of the total compensation as disturbance allowance; • *Compensation and Resettlement Assistance to farmers for loss of crops, trees, or plants* – cash compensation at replacement cost, and 7 percent of the total compensation as disturbance allowance; • *Resettlement Assistance to vulnerable people* including the disabled, pensioners, widows, and female-headed or impoverished households – includes targeted additional assistance and accessible replacement housing; • *Resettlement Assistance to acquire land with security of tenure.* All identified (4,332 to date) PAPs in the lower Msimbazi floodplain, regardless of the location or condition of their lost land, who did not have legal rights or recognizable claims to their plots as of the cut-off-date, are entitled to resettlement assistance. This resettlement assistance is not compensation for loss of land at replacement cost. It is a fixed lump sum payment (and therefore referred to by the Requesters as "Flat Rate" Resettlement Assistance) aimed at facilitating PAPs' access to alternative, safe, and legally registered plots outside the flood-prone area, consistent with the treatment of PAPs with no recognizable legal right or claim to land under ESS5 (Category c, under Paras 10, 29 and footnote 23).[6.] ***3. Livelihood Restoration Program (LRP)***. The LRP forms an integral component of the Lower Msimbazi RAP and is designed to mitigate impacts and restore the livelihoods of PAPs. The LRP provides targeted support to affected households through a combination of alternative livelihood opportunities, skills development, and support to restore or strengthen existing businesses. As of the latest implementation update (May 15, 2026), 1,365 out of 2,692 eligible PAPs in the lower Msimbazi floodplain under the Lower Msimbazi RAP have participated in the LRP roll out engagements. **D. Complaints Related to RAP Implementation**

[6] The amount was established through a market analysis of prevailing residential land prices in Dar es Salaam and assessed as sufficient to acquire a surveyed residential plot with a formal title deed.

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		The Requesters may have misunderstood the entitlements for which they are eligible, depending on their individual circumstances. As implementation of the Lower Msimbazi RAP has advanced, PAPs have at times contested, including in local courts, the adequacy or applicability of the entitlement matrix to their individual cases. These concerns are not unexpected given the number and types of PAPs, and their various entitlements under the Lower Msimbazi RAP. For that reason, an ongoing communication and dissemination program, together with a robust GRM, has been active since Project implementation started, designed to address questions and complaints from affected communities. Concerns that are recorded in the GRM are reviewed case by case by the PIU in a timely manner. The Bank monitors the efficacy of the GRM during frequent periodic implementation missions. As of June 16, 2026, 826 complaints have been received by the GRM. Of these, 753 (91 percent) have been resolved, and the remaining 73 are pending resolution. Grievances primarily include dissatisfaction with compensation for land and loss of profit, exclusion from entitlements, and ownership claims. PAPs who have not yet received compensation and/or resettlement assistance payments fall into the following categories: (a) pending valuation grievances; (b) refusal to accept RAP-approved resettlement assistance; (c) unresolved estate or succession matters; (d) failure to present for payment despite outreach; or (e) incomplete documentation, particularly for institutional entities. Additional financing has been agreed with the Government to address identified resettlement and livelihood restoration funding gaps, including compensation for loss of land for PAPs entitled to LBLRA, which were not anticipated in the 2023 Lower Msimbazi RAP budget. These measures are intended to ensure that all eligible PAPs receive compensation and assistance consistent with the Lower Msimbazi RAP and ESS5. The Bank will continue to closely supervise RAP implementation, strengthen grievance resolution, and monitor outcomes to ensure that remaining cases are addressed in a timely and transparent manner, and that Project implementation proceeds in compliance with applicable World Bank policies, particularly ESS5. **E. Disclosure Forms Without Land Information** Compensation agreement forms that exclude a land compensation component indicate that the PAP concerned was not eligible for compensation for the loss of land. As outlined in the RAP, entitlements for compensation and resettlement assistance are determined based on eligibility, tenure status, and the type of impact. Compensation agreement forms

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		record the applicable entitlements for each PAP following disclosure and explanation under the RAP. Agreement forms where the land compensation section is blank indicate no land compensation, reflecting the entitlement determination applicable to the individual PAP under the RAP, i.e., that no legal rights to the land were identified and hence no compensation for the loss of land is applicable under the RAP. The RAP outlines and requires that PAPs be informed on an individual household basis of their entitlements during the disclosure process prior to signing compensation agreements, as can be seen in Annex 2. Where PAPs have raised concerns regarding the determination or application of their entitlements, including land compensation eligibility, these concerns have been formally recorded and are being addressed on a case-by-case basis as part of the RAP implementation process and through the GRM.
2.	Recent developments and urgency of the complaint, the complaints wish to bring to the attention of the Panel a critical recent development that significantly increases the urgency of this matter. On 20th April 2026, the Government of Tanzania, through the Dar es Salaam City Director and the Minister of State in the Prime Minister Office-Regional Administration and Local Government (RALG), conducted an official contract signing ceremony with the project contractor, China Civil Engineering Construction Corporation (CCECC), for the implementation of the Msimbazi Valley Development Project. According to official communications project implementation is scheduled to commence in June 2026. Despite this development, a substantial number of affected persons have not received compensation for their	***The announced commencement date of a contract financed under the Project for works in the lower Msimbazi floodplain does not supersede Bank policy provisions. No demolition, clearance, or displacement will take place in the area subject to resettlement without prior compensation being paid, in line with ESS5 and the Lower Msimbazi RAP.*** The Government of Tanzania signed the contract for the lower Msimbazi floodplain works in April 2026 following completion of procurement processes and issuance of the World Bank's required clearances. References to June 2026 as a commencement date for the works reflect an indicative contract implementation schedule and do not alter or override the Project's resettlement and compensation obligations. As required under the Lower Msimbazi RAP and consistent with ESS5 and the Environmental and Social Management Plan developed for demolition of compensated structures in the flood plain,[7] construction activities have not started on land where resettlement and compensation have not been completed. This sequencing requirement is explicitly established in the Lower Msimbazi RAP and ESS5 and has been consistently communicated by the World Bank to the implementing agencies. The World Bank acknowledges that a small number of PAPs remain within portions of the Project footprint in the lower Msimbazi floodplain due to unresolved compensation cases, which is not unusual in resettlement processes of this magnitude. These cases are

[7] The "Msimbazi Basin Development Project Environmental and Social Management Plan for the Demolition of Compensated Structures- Lower Msimbazi," dated April 19, 2024, was disclosed on the World Bank website on May 27, 2024, and simultaneous on the Government's website.

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	land, and some have not been compensated at all. Furthermore, there are still affected individuals whose houses remain standing within the project area, as they have neither been paid nor formally resettled.	associated with known issues that are being addressed through the GRM and the Bank's GRS, including land documentation verification, valuation disputes, and estate administration. It should be noted, however, that contrary to the allegation in the Request, the ongoing preventative resettlement from the lower Msimbazi floodplain is 96 percent completed, as noted earlier. Hence, Management disagrees that a "substantial number of affected persons" have not received their entitlements. The few cases of outstanding resettlement will be addressed in line with ESS5 and the RAP prior to the start of civil works in the affected area. The World Bank and the Government of Tanzania have agreed that resolution of outstanding entitlement disputes is a prerequisite for the initiation of works in the affected area. This commitment was reiterated during the April 2025 and April 2026 implementation support missions and formally communicated to the Minister of the Prime Minister's Office Regional Administration and Local Government (PMO-RALG)[8] in April 2025, and to the Permanent Secretaries of the Ministry of Finance and Planning and PMO-RALG in May 2026.
3.	Clarification on the status of affected persons (PAPs). The complaints consist of 412 individuals, all of whom are affected persons (PAPs) with claims related to land compensation under the project. Out of 2,775 PAPs identified, 2,582 were reported to have received compensation mainly for structures. However, land compensation remains unsolved. The remaining 193 PAPs are described as having refused compensation, particularly for land, however, this characterization is inaccurate and misleading. Many of these individuals continue to reside in their houses within the project area because they have not received fair and adequate compensation, particularly land. As such, their continued presence should not be interpreted as refusal, but rather as a consequence of unresolved compensation grievances.	***Given the anonymity of the Requesters, Management is not able to verify the specific claims of the 412 individuals referenced. Nevertheless, the Project has engaged with a subset of PAPs through approximately 18 GRS cases, which may include some of these individuals.*** The Request alleges that 193 PAPs still living in the lower Msimbazi floodplain are being wrongly characterized as having "refused compensation." Management wishes to clarify that this characterization does not accurately reflect the information recorded in Project documentation (e.g., the Aide Memoire from Implementation Support Missions), which specifically recorded that the remaining 193 PAPs had not been provided entitlements due to a range of factors, including but not limited to: ongoing succession and estate administration cases; and refusals to accept compensation and resettlement assistance due to disputes regarding their valuation or adequacy. Management recognizes that some PAPs who remain within the Project footprint have unresolved cases related to their entitlements to compensation and/or resettlement assistance. Continued presence in the Project area does not, on its own, necessarily reflect a PAP's refusal of their entitlements to compensation and/or resettlement assistance, and outstanding cases of PAPs in the area are being addressed in line with the RAP and ESS5 and through the Project's GRM.

[8] In November 2025 the portfolio of Regional Administration and Local Government (RALG) was moved from the President's Office (PO) to the Prime Minister's Office (PMO). Documents referencing PO-RALG or PMO-RALG are referring to the same Ministry.

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	The 412 complaints include: - Those compensated only for structure but not land - Those not compensated at all and residing in the project area. This situation demonstrates that compensation has not been fully and fairly completed, especially with regard to land rights, and that there is no meaningful consultation or resolution of grievances as required under the applicable Resettlement Action Plan (RAP).	With respect to differing compensation outcomes, the Lower Msimbazi RAP provides compensation and resettlement assistance based on eligibility, impact type, and applicable valuation methodologies. Where PAPs have received compensation and/or resettlement assistance for certain impacts but continue to raise concerns regarding other aspects of their entitlements, these concerns have been formally recorded and are subject to case-by-case review in accordance with the RAP and ESS5. The issues raised in the Request appear to reflect a misunderstanding regarding the eligibility criteria for compensation for loss of land under the Project. Cases where PAPs did not receive compensation for loss of land do not in themselves indicate non-compliance. Rather, they reflect the application of the agreed principles outlined in the approved, current version of the Lower Msimbazi RAP and described in the entitlement matrix, which are aligned with ESS5, under which compensation for loss of land is not payable in the absence of legal rights or recognizable claims to plots. As referenced above, the vast majority of the PAPs in the lower Msimbazi floodplain, which is an area declared as hazardous and of no value by the Government several decades prior to the Project, are informal occupants and, hence, per the approved RAP and ESS5, are not entitled to compensation for loss of land. Management notes that there has been sustained and meaningful engagement with PAPs throughout the Project's lifecycle, including during Project design, preparation, disclosure of valuation reports, rollout of the LRP, and overall implementation. The Project has also developed and disseminated IEC materials across the Project area to support stakeholder awareness and use of the GRM. The Government has also engaged with PAPs at a high level to explain the lower Msimbazi floodplain's designation as a legally restricted hazard area and the implications for land ownership rights recognized by the Government. In a meeting attended by the Regional Commissioner, the then President's Office – Regional Administration and Local Government (PO-RALG) Minister (now PMO-RALG) mentioned this and also described the fixed lump sum payment of resettlement assistance to be provided to assist in acquiring land with security of tenure at an alternative site on top of compensation for non-land assets and improvements to land; Annex 2 provides samples of outreach activities. The GRM, which is operational and has been extensively used, remains the primary mechanism for addressing outstanding concerns related to entitlements to compensation and resettlement assistance, including disputes related to land compensation eligibility and valuations. These cases are being actively managed by the implementing agencies with very close and frequent Bank supervision.

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		The Bank will continue to closely supervise the resolution of outstanding cases, including verification of eligibility and entitlements, and to support implementation of RAP procedures to ensure that eligible PAPs receive compensation and resettlement assistance consistent with the Lower Msimbazi RAP and applicable Bank policies. In addition, it has been agreed with the Government that a third-party consultant will be engaged under the Project to carry out an independent audit of RAP implementation. A draft Terms of Reference is being reviewed by the Bank.
4.	**KEY VIOLATIONS:** **1. Incomplete Compensation Agreement Form:** Compensation agreement forms signed by PAPs have missing land components, indicating that land was not compensated. The attached compensation agreement forms show that the land component was left blank, indicated that affected persons were not compensated for land as required.	See Item No. 1, Section E.
5.	**2. Failure to Implement RAP (Pages 45 & 49):** This provision requires compensation for land, which was not implemented. Affected persons were not compensated for land as required under RAP (page 45 and 49), but were instead given flat rate compensation that is only applicable to specific categories of impact, as defined in RAP page 70. RAP clearly requires compensation for land, and this was not implemented.	***These extracts from a draft version of the initial Lower Msimbazi RAP describe the methodology for land valuation and compensation, including eligibility criteria and applicable approaches for those PAPs with formal legal ownership rights to land.*** The Requesters appear to misread the cited provision as establishing land compensation as an entitlement for all PAPs, and that the replacement land valuation process outlined on the excerpt of page 45 that they provided would be used, irrespective of tenure status and related entitlements, which are outlined in the eligibility and entitlements provided in later sections. Management accepts that, read in isolation and outside of the context of the structure of the chapters in the Lower Msimbazi RAP, the entitlement matrix and the broader requirements of ESS5 and other relevant Project documents, as well as the extensive Project engagement and outreach to PAPs on their entitlements conducted thus far, the references cited by the Requesters could reasonably be misconstrued. Section 7 of the Lower Msimbazi RAP (which includes Section 7.5 cited by the Requestor) describes the "Assets Inventory and Valuation," including the process used to survey assets and land and their valuation. It specifies in that section that the Valuator carried out the valuation of affected assets and calculated applicable allowances in accordance with defined entitlement matrix in Section 8. Section 8 of the Lower Msimbazi RAP underlines the importance and role of the eligibility criteria and entitlements to determine the

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		entitlements delivered to each PAP. It presents the Eligibility Criteria and the Entitlement Matrix for Various Categories of PAPs, land compensation at replacement value applies only to PAPs who have formal legal rights to occupy the land (so-called "Rightful Owners" in the approved RAP) in the form of valid occupancy documents that had not expired as of the RAP cut-off date. It should also be further underscored that this was consistently communicated to stakeholders, including PAPs themselves, during RAP preparation and implementation, as noted in Item No. 3 above. Consistent with ESS5, the RPF and RAP call for provision of resettlement assistance, to allow them to acquire land with security of tenure outside the lower Msimbazi floodplain in the form of a fixed lump sum payment. This payment constitutes resettlement assistance, not compensation for lost land. It is not intended as a substitute for land compensation where land compensation is not due and/or applicable. All PAPs in the lower Msimbazi floodplain without formal legal occupancy rights to their land, regardless of the location of their plots or the categories of impact, are entitled to receive the same resettlement assistance, i.e., this fixed lump sum payment.
6.	**3. Misapplication of Flat Rate Compensation (RAP Page 70)** Flat rate compensation intended for submerged land and demolished structure was wrongly applied to PAPs who do not fall under this category. Flat rate compensation was applied inappropriately to affected persons who did not fall under the category defined in RAP (Page 70). This resulted in affected persons receiving compensation that does not reflect their actual losses, particularly loss of land, contrary to ESS5 requirements on compensation at full replacement cost.	***The section of the RAP cited in the Request refers to the in-kind delivery of entitlements to a distinct category of PAPs identified in the RAP who no longer reside in the area as their houses were either demolished or have been affected by floods (submerged). Entitlements for this category of PAPs include an in-kind land entitlement based on a fixed value, referred to as "flat rate" as the size of the land could not be measured.*** ***The term "flat rate" is used in reference to a methodology to derive the amount and the form of the payment for entitlements to PAPs with "demolished/submerged structures". The term "flat rate" is also used in the 2023 RAP when referring to resettlement assistance provided to PAPs without legal or recognizable rights to land.*** ***While the rationale is similar, the entitlement for PAPs with demolished/submerged structures is distinct from the resettlement assistance to assist in finding alternative land provided to those without legal or recognizable rights to land that chose to receive their entitlements in cash.*** All PAPs in the lower Msimbazi floodplain without formal legal rights to land as of the RAP cut-off-date who choose the option to receive their entitlements in the form of cash are entitled to resettlement assistance to help them in acquiring land with security of tenure at an alternative site. This assistance takes the form of a lump sum payment (also referred to as "flat rate" payment) of TZS 4 million (ca. US$1,500). This lump sum amount was established through a market analysis of prevailing residential land prices and

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		assessed as sufficient to acquire a surveyed residential plot with a formal title deed in Dar es Salaam. PAPs without formal legal ownership rights to land by the RAP cut-off date are not entitled to compensation for the loss of land, per ESS5 and the entitlement matrix in the Lower Msimbazi RAP. However, regardless of their location in the lower Msimbazi floodplain, they are entitled to a package of resettlement assistance. The "flat rate" payment is part of the resettlement assistance package provided to all PAPs choosing the cash option who did not hold formal legal rights to the land they were occupying by the Lower Msimbazi RAP cut-off-date. This lump sum payment is not compensation for the loss of land. It is intended to facilitate access to alternative, safe, plots with security of tenure outside the flood-prone area. The referenced section on page 70 of the Lower Msimbazi RAP is from a section (Section 10.3. "Criteria for offering 'in-kind' compensation to the PAPs") describing the detailed packages for in-kind compensation and resettlement assistance for those that choose this in-kind option instead of cash compensation.[9] It describes the entitlements of PAPs who currently live outside the floodplain but whose assets were previously destroyed (including those that were evicted in 2015/16) or that have land that is submerged due to floods. The reference to "flat rate" in this section relates to how the alternative land to be provided as in-kind support would be apportioned considering the challenging nature of these sites (i.e., it is hard to determine the area of the land as it could not be surveyed.). The result was a fair estimate of land area and value for providing these PAPs as part of an in-kind entitlement package. The term is used under the category of "demolished/submerged structures" in the March 2022 RAP, but it is also used in the 2023 RAP when referring to resettlement assistance provided to PAPs without formal legal rights to land. While the methodology for arriving at the respective values and the use of the term "flat rate" was similar, the context of the respective entitlements is distinct.
7.	**4. Evidence of Land valuation without compensation:** Valuation form No.3 confirms that affected persons' land was identified and measured during the valuation process. However, despite this formal recognition of land assets, compensation agreements	***Valuation Form No. 3 is used during the census and inventory to record affected assets and relevant land characteristics. The form documents information such as asset types and estimated land size. It does not itself determine compensation entitlements or payment modalities.*** Under the RAP, entitlement to compensation for loss of land is determined based on eligibility and tenure status and is reflected in the entitlement matrix, compensation schedules, and compensation agreements. As referenced above, per the Lower Msimbazi RAP

[9] Note that as part of the Lower Msimbazi RAP preparation, validation, and disclosure process, PAPs were presented with both cash and in-kind options for their entitlements. The majority of the PAPs chose cash and currently only 7 PAPs have confirmed the in-kind options.

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	form does not include land compensation, as the relevant sections were left blank. This demonstrates a clear inconsistency between the valuation process and the actual compensation provided to affected persons. While RAP (page 45 and 49) provides for compensation of land, and valuation records confirm that land was assessed, affected persons were not compensated accordingly. This is inconsistent with ESS5 requirements on compensation at full replacement cost.	entitlement matrix, compensation for loss of land is only due to those PAPs that hold a formal and legal title to the land they are occupying, valid at the time of the Project's cut-off-date, which is not the case of the vast majority of PAPs in the lower Msimbazi floodplain. The presence of land information on Valuation Form No. 3 does not, by itself, indicate that land compensation is applicable or due and payable in a given case. Accordingly, conclusions regarding land compensation cannot be drawn from Valuation Form No. 3 alone. More information on engagement during RAP preparation is presented in Item No. 11 and Annex 2.
8.	**NON-COMPLIANCE WITH ESS5:** ESS5 requires compensation at full replacement cost and a fair, transparent process. The failure to compensate land and the use of inappropriate flat rate compensation violate ESS5 principles.	***The Lower Msimbazi RAP requires compensation for the loss of land at full replacement cost for PAPs who legally had right or recognizable claim to occupy the land as of the RAP cut-off-date. PAPs who do not hold valid legal rights by the cut-off-date are not entitled to compensation for the loss of land, as clearly set out in the RAP. Consistent with ESS5 and the Project's approved RAP, these groups are eligible for compensation for non-land assets and improvements to land, and resettlement assistance.*** As addressed in the responses above, eligibility and delivery of compensation and resettlement assistance are implemented in accordance with the Lower Msimbazi RAP, which establishes eligibility criteria, entitlement categories, and applicable compensation and resettlement assistance modalities consistent with ESS5. See also Item No. 1, sections A.1. and A.2., above. Accordingly, the application of compensation and resettlement assistance measures reflects the eligibility- and impact-based framework set out in the Lower Msimbazi RAP and does not constitute non-compliance with ESS5. The Bank confirms that the resettlement process is ongoing, and no displacement has been undertaken under the Project prior to the provision of entitlements in line with ESS5 requirements. PAPs who have pending court cases, grievances under the established GRM, or cases where individuals have not yet been traced, continue to retain possession of and access to their properties and livelihoods. The Bank has consistently reiterated to the Government that civil works must not commence in any affected area until entitlements have been duly provided to eligible PAPs or, where appropriate, funds have been secured through escrow arrangements pending the resolution of legal proceedings. This approach is intended to ensure full compliance with agreed resettlement obligations while allowing sufficient time for due process and the resolution of outstanding cases.

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9.	In attached Resettlement Action Plan (RAP) page 45 and 49 outlining Land valuation procedure and compensation policy for affected land, also attached valuation form number 3 indicating the assessed values of affected structure and Land which is currently being paid using flat rate system which does not reflect actual market value and results in unfair and inadequate compensation to affected persons.	***The resettlement assistance in the form of a fixed lump sum payment to support PAPs in acquiring land with security of tenure at an alternative site is one component of the resettlement assistance package to which these PAPs are entitled. It is not compensation for the loss of land. The small number of PAPs in the lower Msimbazi floodplain who have legal rights or recognizable claims to land will receive compensation for the land at replacement cost, in line with ESS5 and the approved Lower Msimbazi RAP's entitlement matrix. See Item No. 1, Section B.1.*** As addressed in Item No. 5 above, the cited pages describe the land valuation methodology and entitlement framework, including eligibility criteria and applicable compensation and assistance measures. These sections do not establish land compensation as an entitlement for all PAPs irrespective of eligibility or tenure status. Regarding Valuation Form No. 3, please see Item No. 7 above.
10.	There are few people who refused to receive compensation of their structure because of unlawful of depreciation deduction of their buildings instead of replacement cost compensation as is indicated in Resettlement Action Plan (RAPs) draft.	***The Lower Msimbazi RAP valuation methodology explicitly excludes depreciation of structures and assets. The Request provides no specific information or evidence that this has occurred, nor is Management aware of any such cases. If depreciation of structures and/or assets has been applied in their valuation, the affected PAP should approach the PIU or make a complaint to the GRM so that the inconsistency with the RAP can be addressed.*** The Lower Msimbazi RAP explicitly provides that, in determining replacement-cost valuation, depreciation of structures and assets must not be considered (RAP Section 7. Assets Inventory and Valuation). This same requirement was clearly set out in the 2022 version of the RAP. The Request for Inspection does not include any documentary evidence demonstrating that depreciation was applied in the valuation or compensation of structures, such as valuation reports, compensation schedules, or signed compensation agreements reflecting depreciation deductions. If depreciation was applied in any individual case, this would not be aligned with the requirements of the RAP or ESS5 requirements and would need to be corrected. Any such affected PAP should approach the PIU or submit a complaint to the Project's GRM so it can be addressed.
11.	We wish to clarify that prior to the valuation exercise, project authorities conducted meetings with affected community. During these meetings, it was communicated and agreed that compensation would be provided for Land, structures	***Initial consultations provided broad guidance on Project principles including entitlements based on each PAP's eligibility. Final entitlement details, however, are determined during RAP implementation. In Management's view there are no inconsistencies regarding the information about RAP entitlements.***

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	(Buildings), and necessary allowances. However, during the implementation of compensation, this agreement was not fully honored. Leading to significant grievances among the affected persons. This inconsistency between initial commitments and actual compensation is one of the key issues forming the basis of our complaint.	Management confirms that consultations have been conducted with affected communities, throughout the Project's preparation and implementation phases, specifically: • *Extensive stakeholder engagement shaped Project design:* Stakeholder consultations were carried out in 2018 for the "Msimbazi Opportunity," a vision document that laid the foundations for the Msimbazi Project. Government, technical experts, and communities came together over 9 months of consultations through 30 sessions, engaging 59 institutions, 150 representatives, and thousands of citizens. A broad consensus was built around the need for transformative interventions, including preventive resettlement from high-risk floodplain areas that were necessary to make the lower Msimbazi River Basin safe and sustainable. Input from stakeholders in this process helped inform the strategic basis for the design of the resettlement program as outlined in the RPF and Concept Stage Environmental and Social Review Summary, including the desire to consider legacy resettlement and entitlement packages that catered to each PAP, with differential treatment of those with surveyed and non-surveyed land,[10] • *Consultations with affected communities were carried out during RAP preparation:* During Project preparation, consultations with affected communities covered (among others), principles of asset inventory, the census of PAPs, and valuation of property. Compensation for lost structures and applicable allowances, and, where eligible, compensation for loss of land, as outlined in the Lower Msimbazi RAP, were also discussed. A total of 17 community meetings, exclusively targeted at PAPs in the lower Msimbazi floodplain, were conducted in November 2021 and attended by 1,967 participants. The summary of these consultations is included in the consultations section of the RAP. An example included in Section 4 - Public Consultation and Disclosure Information, Public Meeting Summary of PAPs Queries and Response notes that PAPs in Mtambani and Mkunguni were advised that land was to be compensated but "*the presence of a land title deed or valid habitat license will cement the process*," and that, *"There*

[10] Msimbazi Opportunity Plan, Annexure C. https://documents.worldbank.org/en/publication/documents-reports/documentdetail/874531555397540840. This provided early substantive but general strategic input to the resettlement program before the detailed Project and related resettlement instruments were developed. Inputs from this process that fed into the strategic approach to the Project's resettlement included: (i) the desire and necessity for people in flood-prone areas to be relocated; (ii) the importance of taking into account the lessons from previous resettlements (avoiding forced evictions, considering provision of options for relocation nearby with transitional support, including previous resettled PAPs as part of the resettlement); (iii) providing compensation for losses (including tenants, affected assets, different entitlements depending on whether surveyed or non-surveyed land); (iv) communication to community on Project and processes; and (v) timely payment for compensation, which should be before demolition.

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		will be arrangements to ensure security of tenure for the PAPs with no title deed." • *Valuation and Compensation Process during RAP implementation*: The process of defining eligibility for entitlements and valuation leading to the final compensation figures was iterative and consultative, allowing for complaints, clarifications, and corrections. After the initial inventory and census of the PAPs assets and land, the proposed entitlements and compensation were disclosed between February and March 2023, reaching 92% of the surveyed PAPs and received important feedback, questions, and complaints. Based on this feedback, further validation, valuation, and corrections to individual PAP eligibility for entitlements, valuation, and compensation figures were undertaken. The resulting valuations were formally approved by the Government in September 2023[11] and disclosed in November 2023 with the process of reviewing and signing of compensation agreements occurring in December 2023. There were additional updates made based on feedback from a portion of those PAPs and a second valuation report was disclosed to these PAPs with those corrections in March 2024. During RAP implementation, a few PAPs with valid land documents have come forward and the valuation for this land is ongoing, see "*Land values in the lower Msimbazi floodplain"* under point 1. • *Grievance redress:* The GRM required for RAP implementation was established in January 2023, as a condition of Project effectiveness, soon after Project approval and before the initial disclosure process. Grievance Redress Handling Committees were established, staffed, and trained, at the Project Coordination Team (PCT), municipal, ward and sub-ward (*Mtaa*) levels. Committees receive complaints through multiple channels (phone call, social media, email, visits of sub-ward office and public meetings) and have established procedures through which complaints are processed. The GRM receives complaints through multiple channels (phone calls, social media, email, walk-in visits to sub-ward office and public meetings) and has established procedures through which complaints are processed. The system has been continually strengthened through World Bank-delivered training, capacity building (for example, provision of guidance documents and reporting formats), and through the hiring of a RAP implementation consulting firm to assist PMO-RALG in managing the process. The GRM, supplemented by the World

[11] The process and methodology to determine entitlements and valuation were reviewed by the World Bank to ensure consistency with the entitlement matrix, RPF and ESS5, and updates were included in the October 2023 RAP cleared by the World Bank.

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		Bank GRS system in some cases, has and continues to be an important avenue to engage with PAPs.
		• As of June 16, 2026, 826 complaints have been received by the Project GRM. Of these, 753 (91 percent) have been resolved, and the remaining 73 are pending resolution. Land issues are among the complaints received and responded to through the GRM. These include Mabwe Pande returnees claiming land compensation,[12] claims for land compensation with documentation, and general compensation issues that concern land, including dissatisfaction with compensation and issues of dispute and inheritance. These were and are being handled on a case-by-case basis, clarifying eligibility based on the entitlement matrix and reviewing land documentation to determine its legal validity relative to the cut-off date for the Project. Those that are eligible under the entitlement matrix and with valid land documentation are undergoing land valuation (see "*Land values in the lower Msimbazi floodplain" under Item No. 1*). Those that were determined to not be eligible were informed of such and provided the opportunity to provide further documentation. For those that contest their eligibility for compensation of lost land in court, or are involved in ownership or inheritance disputes, escrow accounts are being established by the Government.
		• *Other continued engagement during implementation*: PIU staff and RAP implementation consultants have engaged frequently with PAPs in the lower Msimbazi floodplain to oversee the set-up of Grievance Redress Handling Committees, implementation of grievance resolution and livelihood restoration, undertaking field verification visits to resolve issues. Between October 2025 and January 2026, the PIU organized grievance resolution clinics with complainants; the Bank attended some of these as an observer to help guide policy compliance where needed. These include but are not limited to meetings held on October 20, 2025 (PAPs 001-003) and January 21, 2026 (PAP 004),[13] which covered the following topics:
		  • PAP 001 on a land compensation-related complaint;
		  • PAP 002 on loss of profits related to relocation;
		  • PAP 003 on omissions during asset inventory; and
		  • PAP 004 on loss of profits and additional new complaints on land compensation at replacement cost.
		• PIU representatives hold periodic meetings with PAPs to respond to questions and interact with communities, most

[12] These are PAPs who were relocated by the Government in the past to Mabwe Pande area, about 30km from the Lower Msimbazi area, and were provided land plots and some building materials to restore their livelihoods. Some of the PAPs returned to the area after that Government-led resettlement process.
[13] The references to "PAP 00X" concern GRS cases.

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		recently on the roll out of the LRP, in which 1,365 PAPs have participated. • Ad-hoc visits have taken place with the PAP community, such as the public meeting held by the PO-RALG Minister on November 15, 2023, to provide information to PAPs about the hazardous nature of the lower Msimbazi floodplain, resettlement assistance offered to PAPs and limitations imposed by the prevailing legal and regulatory framework on compensating land within the area. • IEC materials such as posters on grievance management have been prepared and distributed in the community offices, which include, among others, Sub-ward executive offices of Hananasif, Suna, Idrissa, Mwinyimkuu, Ilala Kota, Msimbazi Bondeni, and Mkunguni A, and Ward executive offices of Hananasif, Mzimuni, and Magomeni. • In summary, extensive consultation and information dissemination events have taken place throughout the development and the implementation of the Project to keep communities informed about Project activities, their impacts, and the instruments in place to address these impacts. Final compensation amounts are determined on a case-by-case basis through the application of the formal eligibility and valuation processes, using a validation and verification process with PAPs, by disclosing compensation, and allowing them to complain, correct, and receive clarification on the entitlements and valuation applied. • Management acknowledges that there may be gaps in stakeholder understanding of the provisions of the Lower Msimbazi RAP. Management therefore commits to continue working with the Government to strengthen communication and sensitize Lower Msimbazi PAPs on their entitlements, the overall content and applicability of the Lower Msimbazi RAP prior to the commencement of any civil works in the area. Annex 2 includes a sample of communications from the Government related to entitlements, grievance management, and compensation under the Project.
12.	**POLICY NONCOMPLIANCE** The complaint concerns serious non-compliance with the approved Resettlement Action Plan (RAP) and Environmental and Social Standard 5 (ESS5) on Land Acquisition and Involuntary Resettlement. We believe that the project did not comply with the World Bank	***Management has not been able to identify non-compliance with Bank policy in relation to the claims alleged in the Request, based on the limited information provided.*** The Project is governed by the ESF. Accordingly, Operational Policy 4.12 does not apply to this Project. The applicable standard is ESS5. The RAPs were prepared and disclosed in accordance with ESS5, and the compensation and assistance measures applied under the Project reflect the eligibility- and impact-based framework established therein.

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	policies governing involuntary resettlement and compensation, particularly: - World Bank Operational Policy 4.12 – Involuntary Resettlement - World Bank Environmental and Social Standard 5 – Land Acquisition, Restrictions on Land Use and Involuntary Resettlement. These policies require that affected persons receive fair and full compensation for their land and assets at replacement cost and the resettlement process be implemented in accordance with the approved Resettlement Action Plan (RAP). Furthermore, the RAP for Msimbazi Basin Development Project (page 70) provides that owners with demolished property or submerged land will receive flat rate compensation. However, in practice many affected persons were not compensated for their land, and in several disclosure forms the land compensation section was left blank. As a result, affected persons lost their land without receiving the compensation provided for in the RAP and required under World Bank policies.	See also Item No. 1, Sections A. through E., above.
13.	**PRIOR CONTACT** [O]ur concerns regarding compensation process under Msimbazi Basin Development Project were previously reported to World Bank country office in Tanzania through written communications addressed to the Bank and its representatives, including [Senior Social Development Specialist]. In these communications, we raised serious concerns about the use of flat rate compensation. In response, [Senior Social Development Specialist]	***Management notes that it has been engaged with the Borrower and PAPs, as highlighted in Item 3, on compensation-related grievances through ongoing supervision and implementation support, as well as through review of the Project GRM and any complaints made through the Bank's GRS.*** Communications between the Bank and PAPs reflect the Bank's role in supporting and monitoring the Borrower's compliance with ESS5, in accordance with the Project's legal and operational arrangements. The responses provided to the complainants who submitted complaints to the Bank are case-specific and based on the information available at the time. All complaints sent to the Bank are managed following the GRS procedures.

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	indicated support for the position of the implementing agency regarding the application of flat rate compensation. Copies of the correspondence with [Senior Social Development Specialist] of Monday February 23th 2026 is attached as supporting evidence that these concerns were previously brought to the attention of the World Bank.	
14.	RETALIATION. We fear possible retaliation or threats because of this complaint we request confidentially.	***Management notes the concerns raised regarding confidentiality and fear of possible retaliation.*** The World Bank understands the importance of confidentiality in this context and will continue to handle communications related to the Project in a manner consistent with its policies and procedures, including respect for confidentiality.

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ANNEX 2
SAMPLE OF OUTREACH ACTIVITIES AND DOCUMENTATION BY THE PROJECT

	Engagement	Media Links / Coverage
1	Newspaper Notice on Compensation Process, Consultation Schedule, and Re-valuation for Grievance Cases, **October 2023**	MWANANCHI MATANGAZO 9 JAMHURI YA MUUNGANO WA TANZANIA OFISI YA RAIS TAWALA ZA MIKOA NA SERIKALI ZA MITAA MRADI WA UENDELEZAJI WA BONDE LA MSIMBAZI (IDA CREDIT NO. 7215-TA) TANGAZO KWA UMMA ZOEZI LA ULIPAJI FIDIA KWA WATU WANAOATHIRIKA NA MRADI JAMHURI YA MUUNGANO WA TANZANIA OFISI YA RAIS TAWALA ZA MIKOA NA SERIKALI ZA MITAA MRADI WA UENDELEZAJI WA BONDE LA MSIMBAZI (IDA CREDIT NO. 7215-TA) TANGAZO KWA UMMA ZOEZI LA UHAKIKI WA MALI ZILIZOATHIRIKA NA MRADI KWA WATU AMBAO HAWAKUAFIKI VIWANGO VYA FIDIA NA WALIOSAJILI MALALAMIKO
2	Ministerial Announcement on Compensation and Flat-Rate Resettlement Assistance in Msimbazi Project Area **on** Wednesday, November 15, 2023	• https://twitter.com/CloudsMediaLive/status/1724822055185420697?t=UCfq3NIpzx4FAtrtlnGXKw&s=19 • https://www.okuly.co.tz/2023/11/wananchi-2400-wanaopisha-uendelezaji.html?m=1 • https://www.facebook.com/TAMISEMI/videos/1413686259187213/?rdid=I7rmf5UDclHHlHxM#

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3	Front-Page Media Coverage on Flat/Lumpsum Payment of 4M TZS as Resettlement Assistance for PAPs	
4	Media Briefing on Msimbazi Basin Development Project, Project Coordinator with National Media Outlets	• https://youtu.be/Av5UMoVdCwc?si=veUr-7LeQxkxvLs0 • https://www.mwananchi.co.tz/mw/habari/kitaifa/zabuni-ujenzi-daraja-la-jangwani-yatangazwa-4517442
5	Government Media Briefing on Compensation, Relocation, and Post-Compensation Clearance Activities	

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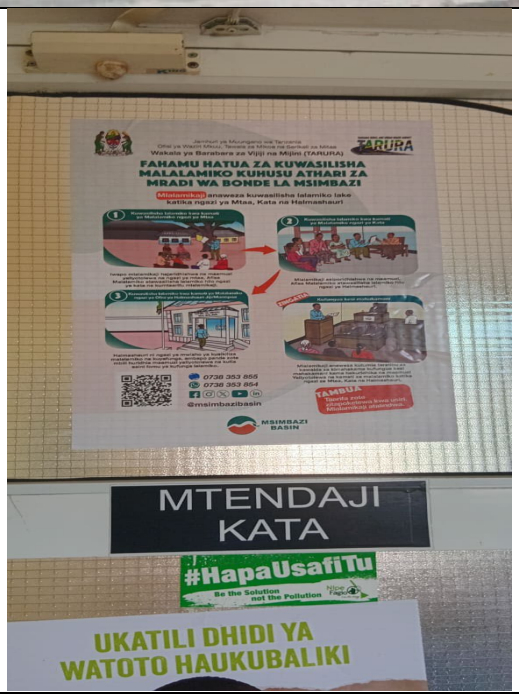
6	Grievance Mechanism poster at Hananasif Sub-ward Administrative Office	
7	Grievance Mechanism poster at Upanga Magharibi Ward Administrative Office	

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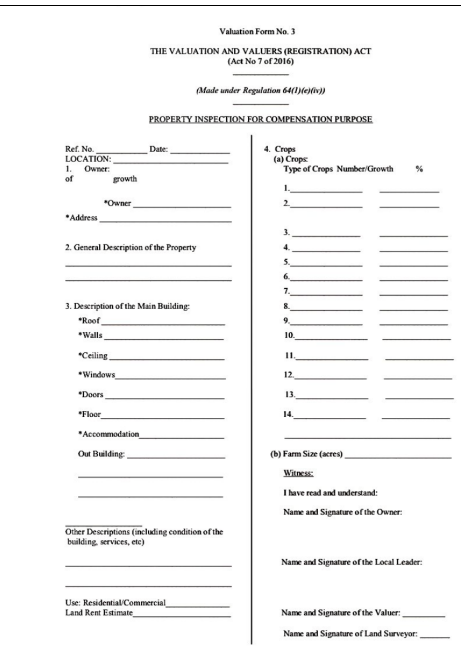
8	Sample Property Inspection form – Valuation Form 3	
9	Sample form for selection of compensation option	

Valuation Form No. 3

THE VALUATION AND VALUERS (REGISTRATION) ACT
(Act No 7 of 2016)

(Made under Regulation 64(1)(e)(iv))

PROPERTY INSPECTION FOR COMPENSATION PURPOSE

Ref. No. _____ Date: _____
LOCATION: _____
1. Owner:
of growth

*Owner _____
*Address _____

2. General Description of the Property
_____
_____

3. Description of the Main Building:
*Roof _____
*Walls _____
*Ceiling _____
*Windows _____
*Doors _____
*Floor _____
*Accommodation _____
Out Building: _____
_____
_____

Other Descriptions (including condition of the building, services, etc)
_____
_____

Use: Residential/Commercial _____
Land Rent Estimate _____

4. Crops
(a) Crops:
Type of Crops Number/Growth %

1. _____ _____
2. _____ _____
3. _____ _____
4. _____ _____
5. _____ _____
6. _____ _____
7. _____ _____
8. _____ _____
9. _____ _____
10. _____ _____
11. _____ _____
12. _____ _____
13. _____ _____
14. _____ _____

(b) Farm Size (acres) _____

Witness:

I have read and understand:

Name and Signature of the Owner:

Name and Signature of the Local Leader:

Name and Signature of the Valuer: _____

Name and Signature of Land Surveyor: _____

JAMHURI YA MUUNGANO WA TANZANIA

OFISI YA RAIS
TAWALA ZA MIKOA NA SERIKALI ZA MITAA

MRADI WA UENDELEZAJI WA BONDE LA MSIMBAZI

HATI YA KUBADILI AINA YA MALIPO YA FIDIA

Namba ya uthamini ..... Kata: ..... Mtaa:.....

Mimi ..... nikiwa na akili zangu timamu na bila kushawishiwa na mtu yeyote, nathibitisha kwamba nimeonyeshwa mali zangu zilizoathirika kwenye jedwali la fidia lililoidhinishwa na Mthamini Mkuu kwa namba ya uthamini iliyoonyeshwa hapo juu.

Aidha nakiri kutaarifiwa haki na stahiki zangu ninazostahili kulipwa kama fidia na hivyo kupewa uhuru wa kuchagua kati ya aina hizo za fidia ambazo ni fidia ya Mali kwa mali na fidia ya Fedha.

Na.	Aina ya Malipo ya Fidia	Weka alama (✓) kwenye Fidia Husika
1	Fidia ya Fedha kwenda Mali kwa Mali	
2	Fidia ya Mali kwa Mali kwenda Fedha	

.....	.....	.....
Jina la Mguswa	**Saini na Dole Gumba**	**Tarehe**
.....	.....	.....
Jina la Mthamini	**Saini**	**Tarehe**
.....	.....	.....
Jina la Afisa Mtendaji wa Mtaa	**Saini na Muhuri**	**Tarehe**

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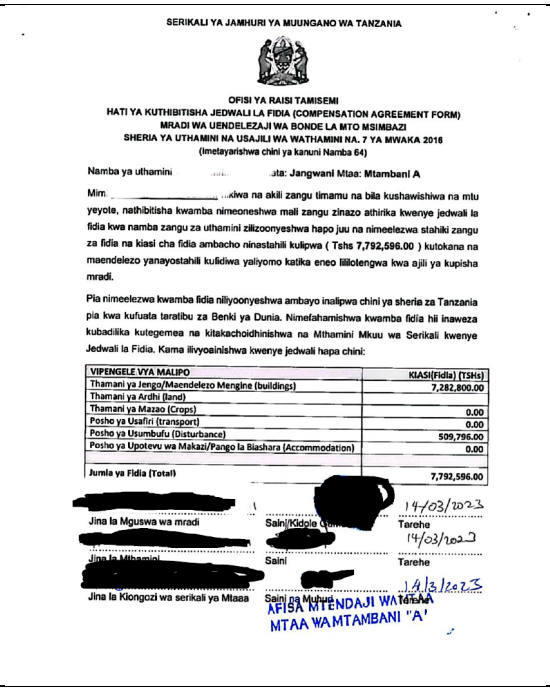
10	Sample Valuation Disclosure Form	

SERIKALI YA JAMHURI YA MUUNGANO WA TANZANIA

OFISI YA RAISI TAMISEMI
HATI YA KUTHIBITISHA JEDWALI LA FIDIA (COMPENSATION AGREEMENT FORM)
MRADI WA UENDELEZAJI WA BONDE LA MTO MSIMBAZI
SHERIA YA UTHAMINI NA USAJILI WA WATHAMINI NA. 7 YA MWAKA 2016
(Imetayarishwa chini ya kanuni Namba 64)

Namba ya uthamini ...ata: Jangwani Mtaa: Mtambani A

Mim[redacted]...kiwa na akili zangu timamu na bila kushawishiwa na mtu yeyote, nathibitisha kwamba nimeoneshwa mali zangu zinazo athirika kwenye jedwali la fidia kwa namba zangu za uthamini zilizoonyeshwa hapo juu na nimeelezwa stahiki zangu za fidia na kiasi cha fidia ambacho ninastahili kulipwa (Tshs 7,792,596.00) kutokana na maendelezo yanayostahili kufidiwa yaliyomo katika eneo lililotengwa kwa ajili ya kupisha mradi.

Pia nimeelezwa kwamba fidia niliyoonyeshwa ambayo inalipwa chini ya sheria za Tanzania pia kwa kufuata taratibu za Benki ya Dunia. Nimefahamishwa kwamba fidia hii inaweza kubadilika kutegemea na kitakachoidhinishwa na Mthamini Mkuu wa Serikali kwenye Jedwali la Fidia. Kama ilivyosinishwa kwenye jedwali hapa chini:

VIPENGELE VYA MALIPO	KIASI(Fidia) (TSHs)
Thamani ya Jengo/Maendelezo Mengine (buildings)	7,282,800.00
Thamani ya Ardhi (land)	
Thamani ya Mazao (Crops)	0.00
Posho ya Usafiri (transport)	0.00
Posho ya Usumbufu (Disturbance)	509,796.00
Posho ya Upotevu wa Makazi/Pango la Biashara (Accommodation)	0.00
Jumla ya Fidia (Total)	7,792,596.00

[redacted] 14/03/2023
Jina la Mguswa wa mradi Saini/Kidole (Tumb) Tarehe

[redacted] 14/03/2023
Jina la Mthamini Saini Tarehe

[redacted] 14/3/2023
Jina la Kiongozi wa serikali ya Mtaaa Saini na Muhuri Tarehe

AFISA MTENDAJI WA MTAA
MTAA WA MTAMBANI "A"

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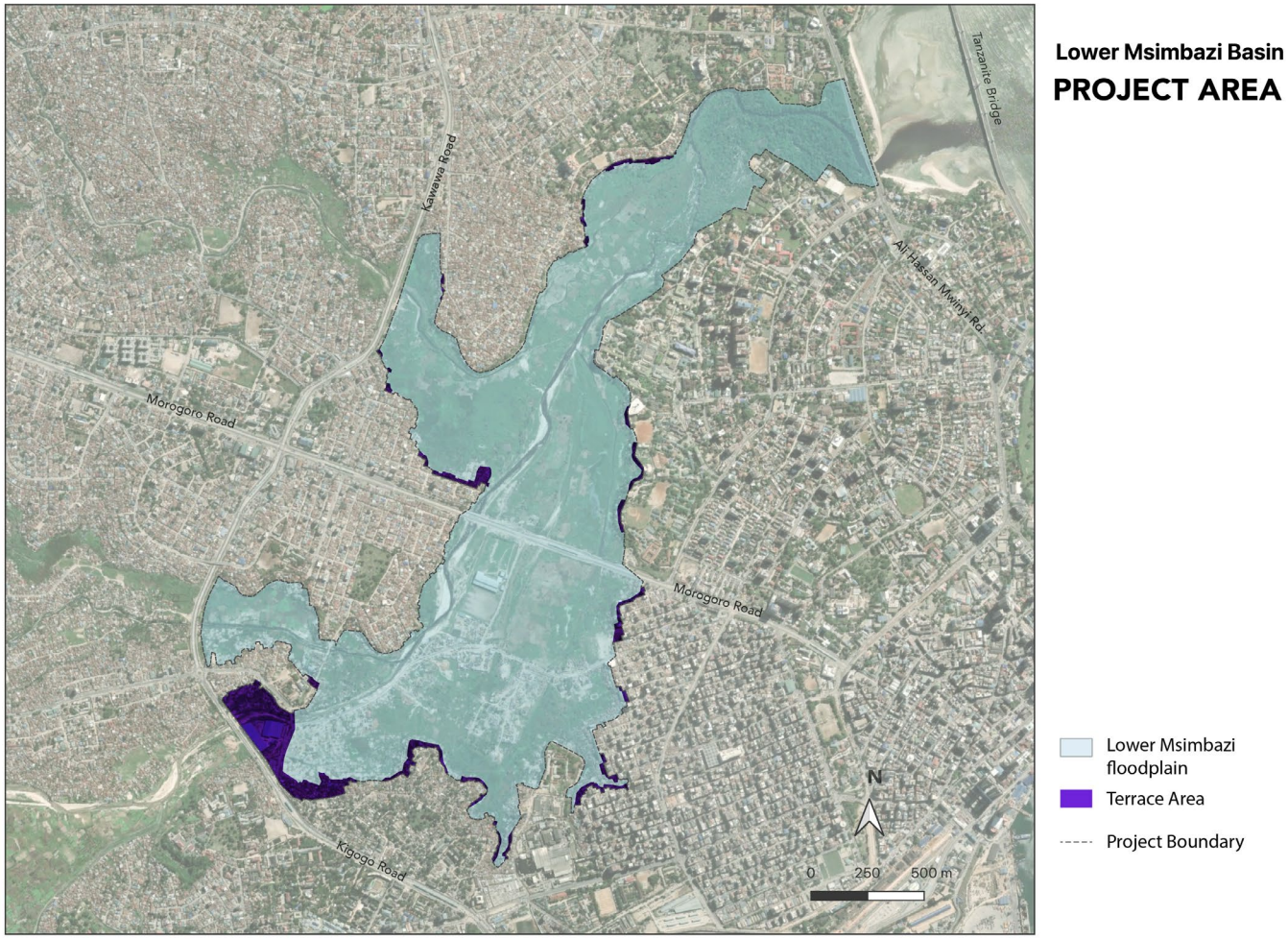
ANNEX 3
LOWER MSIMBAZI PROJECT SITE



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