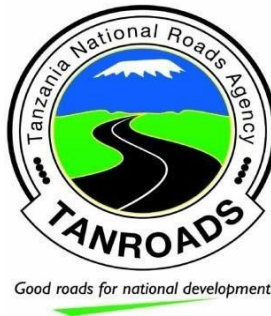




**THE UNITED REPUBLIC OF TANZANIA  
MINISTRY OF WORKS AND COMMUNICATION  
TANZANIA NATIONAL ROADS AGENCY**



**Contract No. TRD/HO/1023/2018/19  
Tanzania Transport Integration Project (TanTIP)**

**RESETTLEMENT AUDIT FOR LAKE MANYARA  
AIRPORT**

**17 October 2023**

**Consultant**



**In Joint Venture with**



**Sub- Consultants**



## EXECUTIVE SUMMARY

### 1. BACKGROUND

The Government of the United Republic of Tanzania, represented by the Ministry of Finance and Planning, has secured credit from the World Bank (WB) for the implementation of the Tanzania Transport Integration Project (TanTIP). A portion of the TanTIP proceeds has been allocated to the expansion, rehabilitation, and improvement of the Lake Manyara Regional Airport (the Project) implemented through the Tanzania National Road Agency (TANROADS).

The upgrading of the Lake Manyara Regional Airport required the physical and economic displacement of a total of 189 households located within the Project Area. To ensure compliance with the World Bank Environmental and Social Framework (ESF) – specifically Environmental and Social Standard 5 (ESS5) – and to mitigate the range of impacts of displacement, TANROADS prepared a Resettlement Action Plan (RAP) in November 2021.

Additional environmental and social commitments were however established after the preparation of the 2021 RAP, which included the TanTIP Resettlement Policy Framework (RPF) of 2022, and the Environmental and Social Commitment Plan (ESCP) of 2022, as defined in the ESCP and TanTIP project legal agreement.

The 2021 RAP identified the full range of Project Affected Persons (PAPs), and outlined the eligibility criteria, entitlement framework and livelihood restoration measures to be provided by TANROADS. The implementation of the RAP provisions was undertaken by TANROADS between 2021 and 2022, through the TanTIP Project Implementation Unit (PIU). Barring the payment of outstanding interest charges by TANROADS, the resettlement process is considered to be largely concluded.

### 2. OBJECTIVE OF THIS RESETTLEMENT AUDIT

TANROADS appointed a competent resettlement specialist to prepare this Resettlement Audit, with the aim of determining the level of conformance with the 2021 RAP, the ESS5 and the general requirements of additional standards established after 2022. Where there are any noted gaps, this audit has included a corrective action plan. The findings of this audit are based on a fieldwork mission undertaken from the 22<sup>nd</sup> to the 26<sup>th</sup> of May 2023 which included:

- 1. Request for Information and Document Review:** A formal request for information was submitted to TANROADS to obtain all relevant project reports, documents, data, and evidence. TANROADS freely provided all relevant documentation.
- 2. Interview Program:** An interview program was undertaken by the resettlement specialists, which included one-on-one interviews with local authorities, as well as with affected persons through Focus Group Discussions.
- 3. Perception Survey:** This audit included a Perception Survey to profile the affected persons'

experience of their losses, compensation payment and their responses in terms of restoring their living conditions and livelihoods. The Perception Survey covered a statistically valid random sample of households (assuming a confidence level of 95% and a margin of error of 8%) or a total of 89 PAPs for the Lake Manyara Airport Project.

### **3. FINDINGS**

With respect to the number of PAPs that were either physically or economically displaced, this audit found that the 2021 RAP provided inconsistent numbers of physically and/or economically displaced persons when compared to the legally required Valuation Reports. Closer investigations showed that the Valuation Reports provided the correct figure of 189 PAPs. Of the 189 PAPS, 114 were physically displaced while 75 were economically displaced.

This audit finds that all compensation and resettlement support provided by TANROADS was in the form of cash payments allowances only, as required under Tanzania land acquisition law. This audit found that cash compensation was favored by most PAPs, as was claimed by the 2021 RAP, although there was limited knowledge by PAPs of other forms of compensation (i.e., in-kind replacement land or housing).

As per the latest valuation figures, TANROADS have paid a total of TZS 5,920,168,732.02 to the affected households in the form of resettlement compensation. A review of the payments records shows that the payments are largely consistent with the Valuation Reports, and there is no evidence of incorrect payments or there has been a lack of correct payments across a large group of affected persons. All compensation payments, as required in the Valuation Reports, are considered to have been concluded by TANROADS.

The one exception is the outstanding payment of interest charges by TANROADS. This is a statutory requirement when compensation payment has delayed by more than 6 months under Tanzanian Law. TANROADS is currently preparing to finalize these payments. TANROADS has also acknowledged a shortfall in compensation related to meeting the Full Replacement Value according to ESS5, and TANROADS has already requested additional funding to cover the shortfall. Funding is being awaited from the Ministry of Finance before a second round of compensation will be provided. This provision has been included in the corrective action plan.

Under the World Bank ESF, ESS5 and the 2021 RAP, PAPs are to be given the option of taking either cash compensation or replacement assets (such as replacement land and housing), while PAPs should be appropriately informed of the implications of the two options. As noted above, only cash compensation was provided, and no replacement land or housing was provided by TANROADS.

With respect to livelihood restoration and other non-compensation related resettlement support, this audit finds that outside of cash compensation, there were no livelihood restoration programmes or any other form of resettlement support, as required in the 2021 RAP. The result is

that PAPs have been required to restore their own living arrangement and livelihoods with their compensation.

With respect to vulnerable people, the audit notes that no specific intervention were adopted by TANROADS. It was however noted that women were consulted to take into consideration their perspective on the method of compensation, and they were part of the compensation talks alongside their spouse.

The 2021 RAP did provide some basic recommendations to support vulnerable people that would need to be better defined during the implementation phase. The audit did not find any specific program or special measures in place to support vulnerable people during the resettlement process. This is further substantiated by the interviews with affected persons as well as at ward and village level representatives, who confirmed that no special provisions were made for vulnerable people, and they were left to their own devices post cash compensation. The lack of undertaking special measures for addressing the needs and interests of vulnerable peoples appears to be inconsistent with the Objectives of ESS5, to improve living conditions of poor and vulnerable people who are physically displaced, and related provisions of ESS5.

However, alongside the additional compensation payments noted above, TANROADS seeks to provide additional support to vulnerable people and women in particular through the profiling of affected households and their needs and paying special attention to the particular circumstances of members of vulnerable groups during the second rounds of compensation payments.

Based on the above findings, this audit finds that resettlement has been in the form of cash compensation, and payments have to-date been correct. Additional payments are outstanding therefore the resettlement process is considered to still be active. To support future activities, this audit has presented a corrective action plan, which make provision for:

- Continuing the process of paying top-up compensation,
- Improved stakeholder engagement to be undertaken by TANROADS,
- TANROAD to use their appointed social safeguards specialist, with expertise in resettlement planning and implementation, to implement the provisions of this audit.
- Review outstanding grievances and resolve them if they are deemed valid.
- All top-up compensation and engagement to be undertaken in a manner consistent with the TanTIP Gender-Based Violence Action Plan 2022.
- Structured and ongoing monitoring will be undertaken during the implementation of the above requirements.

## DEFINITIONS

**Affected Persons:** Any individual, persons, family, household, group, or collective body that is affected by either physical or economic displacement and are deemed eligible to resettlement assistance and/or compensation under this RPF.

**Allowances:** Additional cash compensation provided into addition to any resettlement assistance and/or compensation provided for the loss of assets, and generally provide transitional support while Affected Persons restore their living conditions and livelihoods after resettlement.

**Compensation:** The forms or combination of cash or in-kind replacement assets to be provided to Affected Persons to compensate the acquisition of land or the loss of assets. In most cases, compensation denotes cash only.

**Economic Displacement:** The loss of assets or access to assets that leads to loss of income sources or livelihoods but does NOT necessarily result in the direct loss of a place of residence.

**Entitlement Framework:** A framework that establishes the specific entitlements (i.e., forms of compensation) granted to Affected Persons who will lose proven assets, as determined during the Asset Inventory.

**Gender Based Violence:** Gender based violence (GBV) refers to any act that is perpetrated against a person's will and is based on gender norms and unequal power relationships. It includes physical, emotional, or psychological and sexual violence, and denial of resources or access to services. Violence includes threats of violence and coercion. GBV inflicts harm on women, girls, men and boys and is a severe violation of several human rights.

**Livelihoods Restoration:** A range of measures and programmes that ensure that the existing livelihoods of Affected Persons is restored, or ideally improved, during and after the resettlement process.

**Physical Displacement:** The displacement, loss, or destruction of the place of residence as a direct result of the development of the Project.

**Replacement cost:** The rate of compensation for lost assets must be calculated at full replacement cost, that is, the market value of the assets plus transaction costs.

**Resettlement Action Plan:** A detailed action plan that establishes the measures to be adopted by the Project in the implementation of any resettlement and compensation.

**Stakeholders:** All individuals, groups, organizations, and institutions interested in and potentially affected by a project or having the ability to influence a project.

**Valuation Report:** The investigation and measuring of all land, interest on and rights to that land, as well as any assets and unexhausted improvements on that land. The Asset Inventory forms the basis for the determination of resettlement assistance and/or compensation to be granted to Affected Persons.

**Vulnerable groups:** Vulnerable persons are defined as people who by virtue of their gender, age, social or economic status may be more adversely affected by economic displacement, when compared to their peers (i.e., other households). These include persons with disabilities and serious illnesses, the elderly, women, youth, women and youth-headed households, persons with literacy challenges, and members of historically vulnerable/marginalized communities as identified under World Bank ESF ESS7.

## **ACRONYMS**

<b>ESF</b>	-	Environmental and Social Framework
<b>ESS5</b>	-	Environmental and Social Standard 5
<b>GBV</b>	-	Gender Based Violence
<b>GM</b>	-	Grievance Mechanism
<b>GRM</b>	-	Grievance Redress Committee(s)
<b>FGD</b>	-	Focus Group Discussion
<b>NGO</b>	-	Non-Governmental Organisation(s)
<b>RAP</b>	-	Resettlement Action Plan
<b>RPF</b>	-	Resettlement Policy Framework
<b>SEP</b>	-	Stakeholder Engagement Plan
<b>TANROADS</b>	-	Tanzanian National Roads Agency
<b>TanTIP</b>	-	Tanzania Transport Integration Projects
<b>WB</b>	-	World Bank

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## **1. INTRODUCTION**

The Government of the United Republic of Tanzania represented by the Ministry of Finance and Planning has secured a credit from the World Bank (WB) for implementation of Tanzania Transport Integration Project (TanTIP). A portion of the TanTIP proceeds had been allocated to the rehabilitation and improvement of the Lake Manyara Regional Airport (the Project) implemented through the Tanzania National Road Agency (TANROADS).

The Project required the compulsory acquisition of land as well as the resettlement of households to allow for the extension of the airport runway. To ensure legal compliance and conformance with

the World Bank Environmental and Social Framework (ESF) – specifically Environmental and Social Standard 5 (ESS5) and Environmental and Social Standard 8 (ESS8), a Resettlement Action Plan (RAP) was prepared by TANROADS<sup>2</sup> in November 2021 to guide how land acquisition and resettlement would be undertaken.

Additional environmental and social commitments were however established after the preparation of the 2021 RAP, which included the TanTIP Resettlement Policy Framework (RPF) of 2022, the Environmental and Social Commitment Plan (ESCP) of 2022, as defined in the and TanTIP project legal agreement.

The 2021 RAP was supported by a Valuation Report which was compiled in February 2020. The Valuation Report consists of legally required surveys which were undertaken in 2018 by certified valuers to identify which properties are affected and determine compensation rates and ultimately the compensation amounts per PAP. The Valuation Report of 2020 was followed by a Supplementary Report, compiled in November 2021, which aimed to value and compensate those who were excluded from the original Valuation Report.

The Valuation and Supplementary Reports were further accompanied by the addition of an Interest Report that was compiled in December 2022. The Interest Report was produced as the result of payment delays from TANROADS and aimed to adequately compensate the PAPs as a result of the payment delays. These reports formed the basis for the compensation paid in 2021 and 2022 by TANROADS to the affected persons.

The RAP and associated Valuation Reports determined which persons (or households) were eligible, as per Tanzanian law, for compensation and resettlement assistance as part of the Project. Tanzanian law does not recognize tenants as project-affected parties unless they own fixed improvements to the land that they occupy. Tanzanian law does not consider lost revenue for informal businesses.

As per Table 1-1, the Valuation Reports and the 2021 RAP presented different numbers in terms of the total affected persons by their type of displacement. TANROADS confirmed that the Valuation Report of February 2020 contained more recent information, and the displacement quantities therein supersede those in the RAP document.

**Table 1-1: Summary of Number of Affected Persons by Type of Displacement**

Type of Displacement	As per Valuation Documents	As per RAP
Total Households	189	187
Physically Displaced	114	92
Economically Displaced	75	95
Graves	48	52
Total Land Area (Acres)	89.684	67.608

The Valuation Reports confirmed that there were ultimately 114 households physically displaced – or lost their place of residence and were required to relocate to a new home. There were an additional 75 households that were economically displaced. This covers households that did not lose their place of residence, but lost access to farmland which is important for households to secure basic household food needs as well as trade for cash income.

The implementation of the RAP was undertaken by TANROADS between 2021 and 2022, through their Project Implementation Unit (PIU), which acted as the Resettlement Planning and Implementation Team.

Payment of cash compensation has concluded, however TANROADS has commenced a second round of compensation to cover the payment of outstanding interest charges. This second round is also required to cover the additional compensation to cover the depreciation of housing which was factored into the first round of compensation. Additional details on the depreciation value are presented in Section 2.2. As such, the resettlement process is considered to be still active.

## 1.1. Aim and Objectives

TANROADS appointed a team of independent resettlement specialists to undertake this resettlement audit in May 2023, in order to determine whether past resettlement implementation complies with the provisions of the 2021 RAP, Tanzanian land acquisition law and the World Bank Environmental and Social Framework (ESF) of 2018.

The aim of this audit was to determine whether TANROADS provided the required (1) fair and prompt compensation, (2) resettlement support, (3) livelihood restoration and (4) other relevant support as defined in the 2021 RAP and as required under national law and the Project standards.

The audit further assessed whether the livelihoods and living standards of affected persons are similar, or exceed, those enjoyed prior to displacement; and if that is not the case, what additional measures, if any, are needed to help improve, or at least restore, livelihood and living standards. This audit also considered the extent to which vulnerable peoples were specifically catered for by implementation of special measures. The specific objectives of this audit included:

1. Reviewing the land acquisition and resettlement process undertaken to date.
2. Verifying, using existing data, the extent/scope of the land acquisition and resettlement.

3. Verifying the status of compensation payments and provision of in-kind replacement assets.
4. Verifying the status of any livelihood restoration programmes.
5. Identifying any implementation gaps / non-conformances against Project standards.
6. Preparing, if required, a corrective action plan to address the gaps / non-conformances.
7. Consideration of resettlement related gender issues.
8. Consideration of vulnerable people and vulnerability in resettlement.

## 1.2. Fieldwork Method

To support the preparation of this audit, the following fieldwork was undertaken:

- **Request for information and document Review:** A formal request for information was submitted to TANROADS, to obtain all relevant project reports, documents, data, and evidence (See Appendix A). TANROADS freely provided all relevant documentation. In addition, this audit collated available data to present an updated PAP list, with the type of losses incurred by each PAP with the data provided and within the time allocation. The collated PAP list has been included in Appendix B.
- **Interview Program:** An interview program was undertaken by the resettlement specialists, which included one-on-one interviews with local authorities as well as with affected persons through Focus Group Discussions. Representatives of vulnerable groups were invited to, and attended, the Focus Group Discussions and were given express opportunities to raise their comments and concerns regarding the resettlement implementation. This included hosting interviews with women in separate groups from men. The total interviews undertaken are presented in Table 1-2 below.

**Table 1-2: Interview Program for Manyara Airport**

No.	Interview Description	Date of interview	No of Participants
1	TANROADS (Social Welfare Officer or similar position)	22/05/2023	3
2	RAP Implementation Team	24/05/2023	3
3	Grievance Committee	24/05/2023	12
4	Karatu District Valuers Office	22/05/2023	1
5	Ward Councilor (Rhotia Ward)	24/05/2023	2
6	Village Leadership / Village Council – Kilima Moja	24/05/2023	5
7	FGD – Kilima Moja – PAP Women / Female-Headed Households	24/05/2023	12
8	FGD – Kilima Moja – PAP Men	24/05/2023	15

A question guide of each interview and detailed notes is presented in Appendix C. A register for each meeting was provided to validate that interview were undertaken. The meeting registers can be found in Appendix E.

- **Perception Survey:** To supplement the qualitative data collected in the interview, this audit included a Perception Survey to profile the affected persons' experience of their losses, compensation payment and their responses in terms of restoring their living conditions.

The Perception Survey covered a statistically valid random sample of households (assuming a confidence level of 95% and a margin of error of 8%) or a total of 89 PAPs for the Lake Manyara Airport Project. The sample was taken from the most up-to-date PAPs list provided by TANROADS and verified by the local leadership. The sample was further randomized depending on the ability of the survey team to find the PAPs, as there was no definitive list of where PAPs has moved to during the resettlement. A copy of the survey is presented in Appendix D.

## 2. Compliance Findings

### 2.1. Compensation (Monetary vs In-Kind Replacement Assets)

This Audit, conducted in May 2023, confirms that 114 households were physically displaced as a direct result of the Project. Both the 2021 RAP and the ESS5 required that TANROADS offer physically displaced households the option of either (1) cash compensation at full replacement value, or (2) replacement structures in lieu of cash compensation.

Specifically, ESS5, under Guidance Note 27.1 states that *“if people living in the project area are required to move to another location, the Borrower will: (a) offer displaced persons choices among feasible resettlement options, including adequate replacement housing or cash compensation; and (b) provide relocation assistance suited to the needs of each group of displaced persons”*.

This audit confirms that no replacement housing or land was offered by TANROADS, nor was this option taken by affected persons. Compensation has been solely in the form of cash as is standard and well-established practice under Tanzanian land acquisition law. The basis for this approach is premised on the 2021 RAP which stated:

*“The communities were given compensation option between in-kind (property to property) and cash compensation. The PAPs preferred cash compensation because they will be free to find places where they will feel comfortable due to get social services like hospital, schools, food market and are eagerly awaiting the compensation, since they feel that it will be some sort of improvement in their social welfare”*.

(RAP, 2021, Section 3.0; pg.10).

All parties interviewed in Table 1-2 above confirmed that they were not provided with a clear understanding of the option of replacement assets *in lieu* of cash compensation. While the understanding of different compensation options will vary from person to person, the Perception Survey shows that 83% of surveyed persons felt that there was not enough engagement on the compensation process.

Interviews undertaken with local leaders and affected persons suggest that while most households would have selected cash compensation if provided the option of cash or in-kind replacement assets. This was based on their limited understanding of the option of in-kind replacement assets, as well as concern that replacement housing provided by the government would be substandard, or homeowners would be provided limited opportunity to provide input into the design of the housing.

In summary, it is good practice to provide affected persons with options with respect to cash compensation or in-kind replacement assets (with ESS5 favoring the latter option). There should also be clear effort to discuss these options with affected persons so that they can make informed decisions on their preferred option. By providing cash compensation only, TANROADS is in partial compliance with ESS5 in the provision of cash compensation (see Section 2.2 for more detail),

however the option of replacement housing was not clearly available to affected persons.

## **2.2. Fair and Prompt Cash Compensation**

Given that resettlement was premised on cash compensation, a fundamental legal and ESS5 requirement is that all cash compensation must be both fair and prompt. Fairness under Tanzanian Law requires compensation to be based on Market Value (including a range of legal allowances) while ESS5 requires compensation to be valued at Full Replacement Value. Furthermore, prompt compensation means that all compensation must be paid fully prior to any resettlement.

The distinction between Market Value and Full Replacement Value noted above is important. ESS5 states that Full Replacement Value must account for *“output value for land or productive assets, or the undepreciated value of replacement material and labor for construction of structures or other fixed assets, plus transaction costs.”*

Analysis of the Valuation Report - which was the primary statutory mechanism for determining cash compensation and which formed the basis for all compensation paid by TANROADS - noted that cash compensation was based on (1) depreciated value for buildings, (2) government compensation rates for crops and trees, and (3) market value for land. The audit however further notes the following:

- **Replacement Value for Buildings:** Interviews with affected persons noted that there were claims of a reduction in the value of the buildings between the payment of compensation and the valuations. Analysis of the Valuation Reports shows that depreciation was applied to structures based on their age and overall build quality. Older buildings or those that were more rundown had a larger depreciation, with a range of 5 to 70% being applied in the Valuation Reports.

The inclusion of depreciation resulted in the compensation methodology being based on Depreciated Replacement Value. The ESS5 as well as the 2021 RAP required compensation to be based on Full Replacement Value – which typically covers the cost to replace a lost structure using new materials and labor, and which excludes all forms of depreciation. The value of the compensation provided for structures, which included depreciation, was inconsistent with the provisions of ESS5.

TANROADS has already acknowledged the shortfall in compensation related to meeting the Full Replacement Value according to ESS5, and TANROADS has already requested additional funding to cover the shortfall. Funding is being awaited from the Ministry of Finance before a second round of compensation will be provided. This provision has been included in the Corrective Action Plan. Future payments, made to include full replacement value, should ensure that TANROADS' payment of compensation is consistent with ESS5.

In addition, the valuations were conducted in 2018 and compiled into a Valuation Report in February 2020, while compensation was paid in 2021 and 2022. The compensation did not account for land and structure price inflation for that period. This is however likely to be

partially covered by the forthcoming additional payments to cover the outstanding interest charges owed by TANROADS.

- **Market Value for Land:** A number of claims were raised during the interviews with affected persons that the land compensation rates did not consider a series of factors such as inflation and displacement and transactions costs.

The Valuation Reports determined land value based on Market Value and not Full Replacement Value as required by the World Bank Environmental and Social Framework and the RAP. Whilst it is very difficult to validate land prices, when compared to similar cases across Tanzania the land rate used is well above average. Land compensation rates in Tanzania range from TZS 300,000 to TZS 12 million per acre, and the rate provided in Manyara was TZS 24 million per acre.

- **Compensation for Loss of Crops and Trees:** The basis of compensation for crops and trees is based on the Valuation Report. A review of this report shows that economically displaced persons would lose only land and trees, and no crops were identified for compensation. The Valuation Report determined the compensation rates for trees using government set rates for the region in which Manyara sits, but these rates were set in 2012. These government-set rates are applicable between 2012 and 2022, and therefore were valid under the Valuation Reports.

While compensation was correctly paid at these rates, the audit noted that the baseline rate for crops and trees was taken from 2012 and was not adjusted for inflation to 2021 values. This is inconsistent with ESS5, which requires that all forms of cash compensation are adjusted for currency inflation (and any other applicable inflationary pressures) if there are substantial gaps or time between the determination of compensation rates and actual payment of compensation.

- **Payment of Statutory Allowances:** The Valuation Report included all the relevant statutory allowances, and these allowances have been correctly paid by TANROADS as evidenced by the transaction records. The various types of allowances provided under Tanzanian law are comprehensive and are considered to cover the ESS5 requirements on moving and transitional support. TANROADS' payment of the statutory allowances, which provided moving and transitional support, is consistent with ESS5.

The audit only notes that no provision has been made for Loss-of-Profit Allowances for local small-scale businesses, on the understanding that none had auditable records as required under national law. Under ESS5, informal businesses would still be eligible for relocation support in some form.

TANROADS has noted this inconsistency with the provisions of ESS5 and has committed to undertake a future market survey to register affected businesses to determine fair compensation rates that will be paid. Once this remediation has been concluded, TANROADS'

actions in relation to loss-of-profit allowances will be in conformance with ESS5 in relation to loss of income.

With respect to prompt payment, this audit found that compensation was correctly paid by TANROADS prior to PAPs having to relocate, and this is fully consistent with ESS5. This included all cash compensation for lost land, crops, trees, and housing as determined by the Valuation Reports.

There remain outstanding payments related to interest charges, which is a Tanzanian law statutory requirement when there is more than a 6-month gap between the authorization of the Valuation Report and actual payment of compensation.

TANROADS has already requested additional funding from the Ministry of Finance to cover the shortfall in compensation related to the interest charges as well as the depreciation of buildings. Funding is being awaited from the Ministry of Finance before a second round of compensation will be provided. Once payments are made then these two non-compliances will likely be remediated.

Table 2-1 provides a summary on the resettlement payments that have been paid by TANROADS. Of the 189 valuation payments that have been declared, 187 valuation payments have been paid, showing a high degree of compliance. TANROADS noted that the 2 affected persons have not been paid since there was a dispute over who the true owner of the property is one of these situations; and that the other cannot be traced.

From the December 2022 interest report prepared by the Valuation Section of the Ministry of Lands, Housing and Human Settlement Development, the total interest payment to be disbursed amongst the PAPs amounts to TZS 507,787,374.62. This audit found that no interest payments have been made and that the arrival of the interest payments remains a major concern amongst the interviewed. The supplementary payments from November 2021 refer to valuations that have been previously incorrectly undertaken or overlooked and were corrected by the Municipal Valuer through the process of a supplementary valuation study in November 2021.

**Table 2-1: Summary of Resettlement Compensation**

<b>Payment Valuation</b>	<b>Total Paid</b>	<b>Outstanding Amount</b>	<b>Total Amount</b>
189 Valuation Payments Declared	187	2	189
Compensation (TZS)	5,912,831,720.62	16,041,120.85	5,928,872,841.47
Total Interest Payment (TZS)	0	507,787,374.62	507,787,374.62
Supp. Payment Nov 2021 (TZS)	7,337,011.40	1,874,342.00	9,211,353.40
Total Disbursement (TZS)	5,920,168,732.02	525,702,837.47	6,445,871,569.49

This audit found that TANROADS have accurately compensated the affected persons as per their unique valuation total. The payment vouchers that the affected persons received for their loss of



assets matches their valuation report total. An example of this can be seen in Appendix F, with a summary of payments being provided (assuming a confidence level of 95% and a margin of error of 5%).

This audit found that the actual payment of compensation amounts to individual PAPs is consistent with the compensation amounts determined for each PAPs in the Valuation Reports. The payment vouchers that the PAP's have received for their loss of assets match their valuation report total. There is no evidence to show that the payments were reduced or discounted, or incorrectly calculated. TANROADS's activity in relation to fair payments of compensation is consistent with ESS5.

This audit does note that there is general dissatisfaction on the compensation rates, and many affected persons claimed that they were not sufficiently paid, and perhaps more importantly, they were not given explanations on how the rates were derived. This is reflected in the interviews where participants claimed that no affected person was provided with a detailed compensation agreement (or similar breakdown of their compensation).

It is often very difficult to refute or validate affected persons' perceptions of compensation. Considering the findings noted above, it is likely that the depreciation of household structures would have reduced the compensation available to households to acquire new building materials and the labor to rebuild their homes. While the higher-than-average land compensation and allowances would have offset much of the loss, the commitment by TANROADS to provide additional compensation to cover interest charges and top-up payments to align with Full-Replacement Value should improve the ability of PAPs to restore their living conditions and livelihoods.

### **2.3. Replacement of Lost Property and Assets**

In cases where compensation is limited to cash only, there should be sufficient funds and additional support provided to affected persons to ensure that they are able to restore their living conditions and livelihood to a level that is at least equal to, or ideally better than what they were prior to the resettlement, subject to the provisions of paragraphs 26 through 36 of ESS5. This audit found that only cash compensation and allowances was provided, and there was no other additional support provided in restoring property and livelihoods.

To better understand the affected persons' responses and self-agency (i.e., their ability to self-organize and restore their living conditions and livelihoods without direct support from TANROADS), the Perception Survey and interviews asked a series of questions on how affected persons responded once compensation was paid.

The Perception Survey (see Table 2-2) suggests that most affected persons used their compensation

to acquire new residential land (70% of surveyed households) as well as build new replacement homes (77% of surveyed households). The fact that 77% focused on building new replacement homes shows that the restoration of their place of residence has clearly been the primary focus of the affected persons.

**Table 2-2: Assets Acquired by Affected Persons with their Compensation.**

Response	% of Surveyed Affected Persons
Buying Replacement Residential Land	70
Buying Replacement Farmland	15
Building Replacement Homes	77
Building New Ancillary Structures	14
Establishing a New Business	22

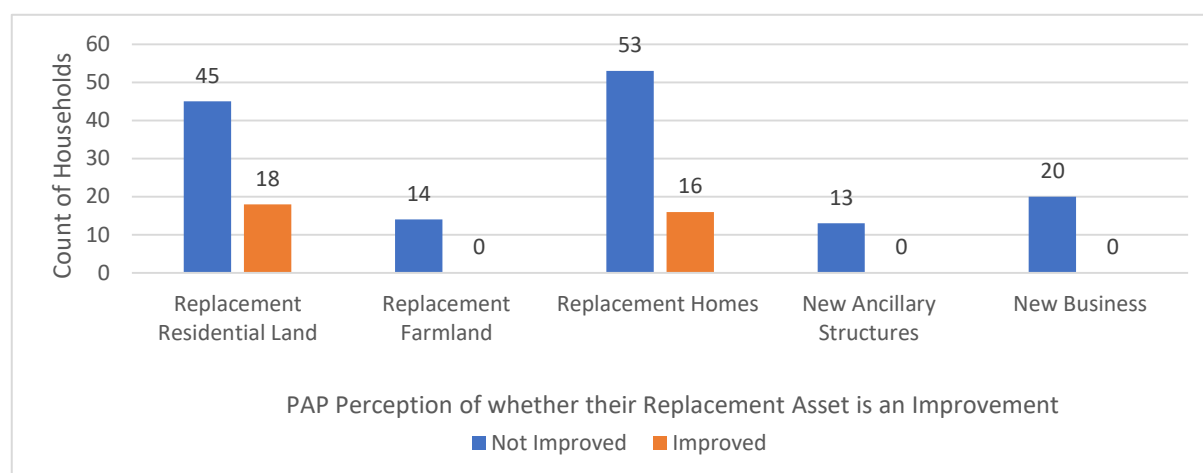
The findings suggest that PAPs have largely been able to self-organize and reestablish their home with the cash compensation provided by TANROADS. There is no evidence seen in the Perception Survey or through interviews that suggest that there has been misuse of the compensation.

Interviews with affected persons (including male and female Focus Group Discussions (FGDs) using a selected sample of affected households) often raised claims of the housing compensation being insufficient, with affected persons claiming that they needed to cross-subsidize their compensation from their farmland compensation, allowances or selling of other properties. These claims are supported by both the interviews and the Perception Survey, which shows that relatively few affected persons (~15%) directed their compensation towards new farmland.

The need to cross-subsidize their compensation for housing is likely to be attributed to two aspects which resulted in the reduction of building compensation value – specifically land and building inflation rates between 2018 and 2021, and the depreciation factored into most buildings. The depreciation in particular would likely have been significant, as affected persons would have needed to buy new building materials and pay construction labor to construct a new home, rather than reestablish an older home.

In addition, the response of each affected household has a material impact on the final replacement building when they are required to construct their own homes. Interviews suggest mixed results with some people claiming to have built improved housing, while others claim that they were given insufficient compensation.

The Perception Survey profiled the general perception of whether the PAPs were able to improve their living conditions and land holdings (see Figure 2-1). It is noted that only 16-18 of the total surveyed PAPs (17-19%) that lost residential land and structures, consider their new replacement homes to be an improvement. Also, no surveyed household claimed that their land farmland holdings were improved.



**Figure 2-1: Household Perception of Replacement Assets**

A potential explanation for the lack of improved farming was noted during the interviews with PAPs. It is apparent that much of the cash compensation provided to PAPs had been directed towards securing replacement residential land and new buildings, with some cross-subsidizing being required from compensation received for the farmland. Interviews suggest that affected persons have therefore responded with a number of measures including buying replacement farmland, or where there is insufficient funds leasing or borrowing additional farmland from relatives.

## 2.4. Livelihood Restoration

Livelihood restoration and assistance is not recognized in Tanzanian law. It is however a key requirement under ESS5, which states that in the case of projects affecting livelihoods or income generation, the resettlement process should include measures to allow affected persons to improve, or at least restore, their incomes or livelihoods.

The 2021 RAP does not provide specific land-based (i.e., small-scale agriculture) livelihood restoration outside of replacement land, as it claimed that only 10 of the 187 PAPs actively farmed land. The Valuation Report similarly shows that economically displaced persons would lose only land and trees, and no crops were identified for compensation.

TANROADS therefore provided compensation in the form of cash only, and no replacement land or assets was provided as part of livelihood restoration, nor were any livelihoods restoration programmes implemented. With respect to the latter, the 2021 RAP included several non-land-based restoration activities including provision of credit schemes, entrepreneurship and management training, vendor registration, and vulnerable people support. The recommendations were generic requirements extracted from the TANTIP Resettlement Policy Framework of 2022.

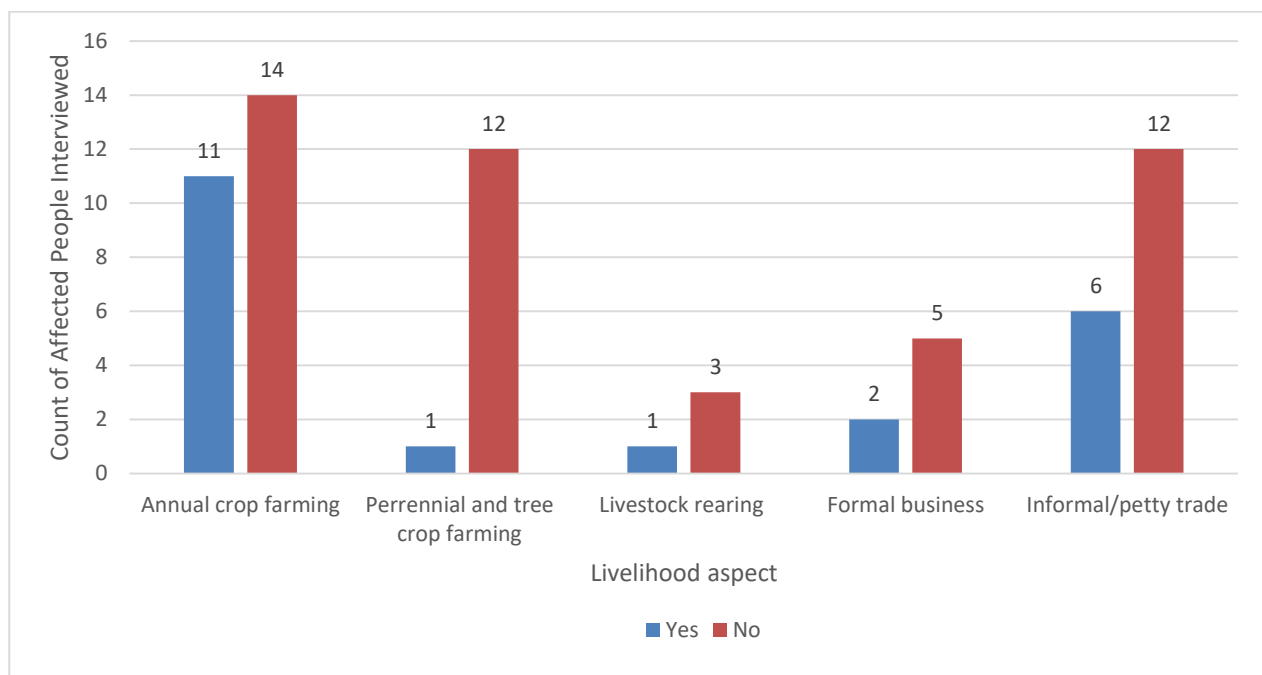
The 2021 RAP, however, noted that specific planning would need to be done during the implementation of the RAP requirements. The 2021 RAP did not provide specific plans or budgets focused on livelihood restoration, relying on much of the effort to be undertaken during

implementation.

TANROADS noted that as part of the construction phase, PAPs were supported through training and employment at the airport and are also being trained for services to be provided during the operational phase of the airport – for example as porters, guards, maintenance, and clearing staffing.

This audit however notes that no formal program was initiated that specifically targets the restoration of the livelihoods of affected persons, outside of cash compensation. Affected persons have been largely required to restore their own living conditions and livelihoods using their compensation and allowances, with no additional supplementary support, which is inconsistent with ESS5.

Given that any livelihood restoration has largely relied on the self-organization and agency of affected households, rather than any direct intervention by TANROADS, it is important to understand how affected persons perceive their ability to restore their own livelihoods. Figure 2-2 below depicts the general perception of affected persons with respect to whether they have been able to restore their livelihoods.



**Figure 2-2: Household Perception of Whether Their Livelihoods Were Restored**

Of the sample of PAPs that lost farmland, 56% perceive that they have been able to restore their farmland. This audit understands that many PAPs were required to cross-subsidize their residential home compensation with compensation received for the farmland. In response many have leased or borrowed additional farmland from relatives if there was insufficient compensation. Overall, it can be concluded that 60% of PAPs that lost farmland have been able to restore their farming practices.

Analysis of Table 2-2 also suggests that of a sub-sample of PAPs that had businesses (including small-scale and informal businesses) affected by the resettlement process, most perceive to have been able to restore their businesses with the compensation provided by TANROADS. This includes 71% of formal businesses (in this case this is a small-scale business with a fixed building) and 66% of informal / petty trade business.

Remedial action in terms of livelihoods restoration is a challenge here in that the resettlement process is largely concluded and affected persons have had over two years to restore their housing and livelihoods. To retrospectively establish livelihood restoration programs after the fact would likely generate further disruptions as affected persons would have to readjust their livelihoods a second time. It is the recommendation of this audit, that no new programs be established, but rather the outstanding top-up payments be made. This will provide affected persons with additional funds to supplement the compensation they would have already spent on housing or land.

## **2.5. Gender & Vulnerable People**

ESS5 stipulates that in cases of physical displacement, *“particular attention will be paid to gender aspects and the needs of the poor and the vulnerable”* (ESS5, 2018: 26), and set the following objectives:

- “Mitigate unavoidable adverse social and economic impacts from land acquisition or restrictions on land use by: (a) providing timely compensation for loss of assets at replacement cost; and (b) assisting displaced persons in their efforts to improve, or at least restore their livelihoods and living standards in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.”
- To improve living conditions of poor or vulnerable persons who are physically displaced, through provision of adequate housing, access to services and facilities, and security of tenure.”

The 2021 RAP makes provision for safeguarding of vulnerable people; however, it does not explicitly consider gender aspects or women in general. The RAP identified 33 PAPs that fall under one of the following categories – orphans (1), female-headed household (7), elderly-headed households (13), widows (6), and households with disabled persons (4). There are no specific gender provisions outside of female-headed households; however, it is noted that the 2021 RAP was finalized prior to the preparation of the TANTIP Gender Based Violence Action Plan of 2022.

The 2021 RAP does provide some basic recommendations that would need to be better defined during the implementation phase. This includes having individual meetings with vulnerable households to determine their needs. The RAP also states that specific assistance would be provided through the RAP Implementing Team through the engagement of Social Specialists and as necessary in cooperation with the Karatu District Council officials. The net result is that much of

that much of the safeguarding of gender and vulnerable people was left to the implementation phase.

The audit did not find any specific program or special measures in place to support vulnerable people during the resettlement process. This is further substantiated by the interviews with affected persons as well as at ward and village level representatives, who confirmed that no special provisions were made to vulnerable peoples, and they were left to their own devices post cash compensation. The lack of undertaking special measures for addressing the needs and interests of vulnerable peoples is inconsistent with the Objectives of ESS5, to improve living conditions of poor and vulnerable people who are physically displaced, and related provisions of ESS5.

Throughout the course of this audit's interviews with women, there were concerns that female heads of households were discriminated against by being provided with lower compensation rates, and that properties of similar standing were compensated less in cases where the head of the household was female. However, upon investigation into the valuation reports, this audit did not find any evidence to support this claim, and payment of compensation was generally correct irrespective of the gender of the recipient.

Interviews with women did not report any cases where female-headed households were excluded from compensation, and no female interviewees reported any known instances of family break-ups or divorces that may potentially have been triggered by compensation. Female widows indicated that they found it more difficult to restore their houses, given the low compensation rates and inability to supplement with their own labor, compared to households that were not in a widowed situation.

In accordance with ESS5, TANROADS confirmed that women were consulted to take into consideration their perspective on the method of compensation, and they were part of the compensation talks alongside their spouse. However, alongside the additional compensation payments noted in earlier sections, TANROADS seeks to provide additional support to vulnerable people, and women in particular, through the profiling of affected households, understanding their specific needs, and paying special attention to the particular circumstances of members of vulnerable groups during the second round of compensation payments. The likely support measures should include, but not be limited to, (1) ensuring effective engagement and representation of females/spouses during community engagement and compensation negotiations, (2) fair female representation in the reconstituted grievance committees, (3) appointment of female CLOs, (4) and integration of TANTIP Gender Based Violence Action Plan of 2022.

## **2.6. Stakeholder Engagement**

The World Bank Environmental and Social Framework covering both ESS5 and well as ESS10 on

Stakeholder Engagement and Information Disclosure, requires that stakeholder engagement with affected persons is undertaken in a manner that is inclusive, accessible, informed, participatory, and culturally sensitive to ensure affected persons have adequate information and understanding of project requirements and impacts on their lives/livelihoods. TANROADS appears to have undertaken these activities largely in line with ESS5 and ESS10.

Bearing this in mind, the information regarding the Lake Manyara airport expansion is considered by this audit to have been made freely available prior to commencement of the project, and in support of the preparation of the 2021 RAP. Interviews with PAPs showed that general awareness of the resettlement process and its provisions were high, and TANROADS did provide regular engagement.

However, interviews with village leaders and PAPs noted that engagement was often deemed insufficient in terms of the technical aspects of the resettlement process. This included little awareness of the option of replacement assets, and more critically for PAPs, disclosure of how the compensation rates were calculated.

As noted above, a key area of concern raised by affected persons was the calculation of the compensation rates, as well as their ability to understand how the compensation rates were calculated on a household-by-household basis. Many interviewees claimed that there was very little information presented during compensation negotiations, and affected persons were not given a breakdown of their individual compensation payment calculations. As a result, some interviewees found it difficult to understand how the compensation related to their assets.

TANROADS intends to undertake a second round of compensation. As included in the Corrective Action Plan (See Section 3), it is the recommendation of this audit report that stakeholder engagement be further supported during the second round of compensation, with particular focus on female-headed households and vulnerable households. To ensure that there is sufficient competent expertise and capacity, the Corrective Action Plan makes provision for a Social Safeguards Specialist and Community Liaison Officers (CLOs) to be appointed by TANROADS for the duration of the second round of compensation.

## **2.7. RAP Implementation Performance**

Any resettlement and compensation process is administratively demanding, and appropriate staffing and resourcing is important often across multiple organizations. TANROADS, through its Project Implementation Unit, acted as the primary implementing agency with the mandate to manage day-to-day requirements.

The audit finds that there were no dedicated social or resettlement personnel hired by TANROADS to manage the implementation of the compensation and resettlement process. Those duties were allocated to national TANROADS personnel, and the day-to-day management of compensation agreements by the Municipal Valuers, while the duties of compensation payment was allocated to

the TANROADS Regional Office accountant.

A key lesson learnt here is that the second round of compensation needs to be supported by an appropriate resettlement team. It is noted that in the 2021 RAP there is no separate cost item for a resettlement team, and often this results in the duties of the team being absorbed into the existing TANROADS organization. It is recommended that any future compensation payments include budget for suitable professional staff to be appointed on a short-term basis. Additional detail is provided in the Corrective Action Plan (Section 2).

## **2.8. Grievance Management**

The TanTIP Resettlement Policy Framework, TanTIP Stakeholder Engagement Plan, and 2021 RAP make detailed provision for the implementation of a Grievance Mechanism. This includes the formation of Ward and District level Grievance Committees to be jointly established by TANROADS and the local government.

Good practice requires that the Grievance mechanism should be established and in place, in accordance with ESS5, as early as possible in development projects so they are able to respond to concerns and grievances of PAPS in a timely manner.

This audit found that the grievance committees were correctly formed by TANROADS at both ward and district level, and these committees were formed at the commencement of the resettlement implementation phase, which is considered to be sufficient to address resettlement grievances during negotiations and payment of compensation.

The TANROADS regional office and Ward Offices provided the audit team files containing hard copy records of grievance information. The information was not filed in an orderly manner, and it was not possible, from the state of the information, to obtain a clear understanding of how grievances were logged, investigated, and closed out. There is no evidence of a centralized grievance register, showing nature, status and pertinent information regarding the grievances that were raised.

Interviews with members of the Ward Grievance Committee noted that there were claims about capacity constraints. It is understood that TANROADS paid village leaders a per diem/stipend to run the Ward Grievance Committee, but there was often confusion about their role and decision-making powers.

The result is that the Ward Grievance Committee only met three times, while it is understood that the District Grievance Committee met less than three times. At the third meeting of the Ward Committee, it was verbally communicated to affected persons that they would be dissolving the committee, despite 34 grievances being raised to the Committee. The Committee noted that of the 34 grievances, they were unsure of which had been resolved or are still outstanding.



There have been some claims during interviews that PAPs were instructed that they needed to lodge complaints regarding valuation to the Ward Office in writing. Several of those who tried to do so were told by the Chairperson of the District Grievance Committee that the project-affected parties had signed off the valuation, the process was closed, and the payment was final.

A central register of grievances was not maintained and therefore analysis of grievances by type was not possible. The general view of the Grievance Committee was that grievances were mostly of two themes: incorrect inventories or assets, or queries concerning the valuation amounts. Members of the Ward Grievance Committee noted that they did not have valuation expertise and were not empowered to resolve grievances related to valuation. As a result, many of the grievances were submitted to TANROADS directly or the District Valuers Office for resolution.

Overall, this audit found that much of the duties and functions of the Grievance Committees fell onto the local authorities. However, the exact function of the committees tended often to be unclear or limited, and such committees often need guidance from a resettlement / social safeguards specialist.

Recording keeping was at best mixed, with grievances logs often non-existent or limited in terms of the documentation available for review. The audit found that issues around grievances raised with PAPs do not always align with what limited documentation was received by the audit team. Often the inconsistencies in the documentation resulted in a lack of clarity regarding the content and status of grievances. While many of the Grievance Committee members appeared to be well meaning, the gaps in record keeping appeared to be related to capacity challenges and organizational management of the committees.

It is recommended that as part of the next round of compensation payments, the grievance committees are formally reconstituted. However, in the next round, TANROADS through a competent Social Safeguards Specialist, will need to function as the formal secretariate of the committee. As with any secretariate, the functions will be to set up meetings, ensure proper record keeping, and provide general guidance to the committee members on how grievance of collected, investigated, and resolved.

## **2.9. Monitoring**

The 2021 RAP required that TANROADS, or through the appointment of a suitable third-party, undertake regular monitoring and evaluation during the implementation of the compensation and resettlement process. This audit found no monitoring has taken place to track the living standards and livelihood restoration of the affected communities.

It is recommended that as part of the next round of compensation payments, that a monitoring program be established consistent with the 2021 RAP requirements. Internal monitoring (through monthly reports) should be undertaken by the recommended Social Safeguards Specialist, while a

once off external monitoring should be undertaken as part of the closure audit, as presented in the Corrective Action Plan (Point 7.2, page 21).

### 3. Corrective Action Plan

Considering the findings detailed throughout this Audit, it is recommended that the measures presented in Table 3-1 be adopted to better align the existing compensation process with ESS5.

**Table 3-1: Corrective Action Plan**

No	Non-Compliance and Corrective Action	Timeline	Resources	Indicators
1	<i>No provision of replacement land or replacement housing given by TANROADS in lieu of cash compensation</i>	<i>Objective: Given the resettlement and compensation process is largely concluded and affected persons have largely restored their housing and livelihoods over the last two years, and that most PAPs would have largely been exhausted by the ongoing process, reopening the entire resettlement process is not recommended, nor should replacement housing or land be provided because of the extent to which compensation has been provided already. TANROADS will be required to pay outstanding compensation as presented in No 2 of this plan.</i>		
2	<i>Compensation payments were to local standards and market value, and top-up adjustments are required to comply with ESS5.</i>	<i>Objective: Top up compensation will need to be paid to align with WB ESF standards – including (1) payment of additional compensation to remove all forms of building depreciation, to (2) for adjustments of crops and trees compensation rates to the 2015-2025 government rates, (3) payment of outstanding interest charges.</i>		
2.1	<b>Sub-Activity 2.1:</b> The Social Safeguards Specialist will prepare a second budget that shows the top-up cost of compensation cost for each PAPs, as well as the overall cost. Where required TANROADS will secure budget from the Ministry of Finance based on this second budget.	Month 1-3	<ul style="list-style-type: none"> <li>• Social Safeguards Specialist</li> <li>• CLOS</li> <li>• Office Equipment</li> <li>• Vehicles</li> <li>• Operational Expenses Budget</li> </ul>	<ol style="list-style-type: none"> <li>1. Finalization of second budget.</li> <li>2. Authorization of the budget by the Ministry of Finance and release of funds.</li> </ol>
2.2	<b>Sub-activity 2.2:</b> The Social Safeguards Specialist will prepare and disclose to PAPs their second Compensation Agreements. The disclosure will be supported by stakeholder engagement as per No 3 of this plan.	Month 3-4		<ol style="list-style-type: none"> <li>1. Disclosure of compensation agreements to PAPs.</li> <li>2. Progress on the number of signed/unsigned agreements.</li> </ol>
2.3	<b>Sub-Activity 2.3:</b> TANROADS will pay out the compensation as per the signed compensation agreements, via bank transfer with suitable auditable records. After payment, the Social Safeguards Specialist will verify if the PAPs have received payment.	Month 5-6		<ol style="list-style-type: none"> <li>1. Documented proof of the payment of compensation to PAPs.</li> </ol>
2.4	<b>Sub-Activity 2.4:</b> TANROADS will close the second round of compensation once payments are made. Records of the second budget, signed compensation agreements and bank transfer records will be maintained for auditing purposes.	Month 7		<ol style="list-style-type: none"> <li>1. Records of the budget signed agreements and bank transfer records are available for review.</li> </ol>

No	Non-Compliance and Corrective Action	Timeline	Resources	Indicators
3	<b>Additional stakeholder engagement is required in support of the top-up payment as mentioned in No 2. This includes more specific engagement related to the disclosure of compensation rates and compensation agreements for each PAP.</b>	<b>Objective: Improved stakeholder engagement with affected persons will be undertaken by TANROADS during the initiation of the second round of compensation payments (See Point 2), to ensure that PAPs are appropriately informed. All forms of engagement will be undertaken by TANROADS through their Social Safeguards Specialist. This position will be supported by one or more Community Liaison Officers to be appointed by TANROADS for the duration of the compensation process.</b>		
3.1	<b>Sub-Activity 3.1:</b> TANROADS will appoint a Social Safeguards Specialist to manage to second round of compensation. The Social Safeguards Specialist will secure additional on-site capacity (through the appointment of gender balanced CLOs) depending on their needs.	Month 1-2	<ul style="list-style-type: none"><li>• Social Safeguards Specialist</li><li>• CLOS</li><li>• Office Equipment</li><li>• Vehicles</li><li>• Operational Expenses Budget</li></ul>	1. Appointment of Social Safeguards Specialist.
3.2	<b>Sub-Activity 3.2:</b> The Social Safeguards Specialist will undertake community meetings to explain to PAPs on the intent of the second round of compensation. This will be done <i>before</i> the disclosure of the compensation agreements.	Month 3-4		2. Appointment of CLOs (if required).
3.3	<b>Sub-Activity 3.3:</b> The Social Safeguards Specialist will continue stakeholder engagement with PAPs during the disclosure and signing of the compensation agreements. This includes explaining the reason for the second payment as well as how the compensation rates/amount were calculated.	Month 3-7		1. Records of community meetings held.
				1. Disclosure of compensation agreements to PAPs.
				2. Progress on the number of signed/unsigned agreements.
4	<b>Capacity and staffing constraints limited to successful implementation of the 2021 RAP provisions, and additional capacity is required for the second round of compensation.</b>	<b>TANROADS has already engaged a Social Safeguards Specialist, with expertise in resettlement planning and implementation, who will be allocated the duties of implementing the provisions of this audit and this corrective action plan. TANROADS will ensure that the resources that are recommended under this corrective action plan are secured in addition to the funds required for the top-up compensation payments.</b>		
4.1	<b>Sub-Activity 4.1:</b> TANROADS will appoint a Social Safeguards Specialist to manage to second round of compensation. The Social Safeguards Specialist will secure additional on-site capacity (through the appointment of gender balanced CLOs) depending on their needs.	Month 1-7	<ul style="list-style-type: none"><li>• Social Safeguards Specialist</li><li>• CLOS</li><li>• Office Equipment</li><li>• Vehicles</li><li>• Operational Expenses Budget</li></ul>	1. Appointment of Social Safeguard Specialist.
				2. Appointment of CLOs (if required).
5	<b>Non-compliances related to past grievance management and other resettlement aspects is largely linked to limited on-the-ground capacity.</b>	<b>Overall Objective: The Grievance Committees should be re-established and managed directly by TanRoads, through their appointed Social Safeguard Specialist. The Specialist will be required to function as the secretariate to the committees and to (1) prepare a formal record of all outstanding grievances, (2) investigate the grievances, and (3) through the District Grievance Committee, make a final decision. All administrative costs will be covered by TanRoads.</b>		
5.1	<b>Sub-Activity 5.1:</b> The Social Safeguards Specialist will reconstitute the grievance committees prior to the disclosure of the compensation agreements. TANROADS will act as a the secretariate of the committees and manage the day-to-day activities through the Social Safeguards Specialist or CLOs.	Month 3-7	<ul style="list-style-type: none"><li>• Social Safeguards Specialist</li><li>• CLOS</li><li>• Office Equipment</li><li>• Vehicles</li></ul>	1. Reformation of the grievance committees.
				2. Record of committee meetings and decisions.

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No	Non-Compliance and Corrective Action		Timeline	Resources	Indicators
5.2	Sub-Activity 5.2: The Social Safeguards Specialist will investigate whether there are any outstanding / unreported grievances from the first round of compensation and determine whether they are valid and need to be forwarded to the committee.		Month 3-7	<ul style="list-style-type: none"><li>Operational Expenses Budget</li><li>Government Per Diems</li></ul>	1. Number of old and newly recorded grievances.
5.3	Sub-Activity 5.3: The Social Safeguards Specialist will support the grievance committee to investigate and resolve any valid old or new grievances.		Month 3-7		2. Number of grievances under investigation.
5.4	Sub-Activity 5.4: The Social Safeguards Specialist will maintain a written grievance log to record all grievances.		Month 3-7		3. Number of resolved / unresolved grievances.
6	No special measures were put place to support vulnerable people (and women in particular) during the resettlement process. This is deemed to be non-compliant with ESS5.	TANROADS has committed to provide additional support to vulnerable people and women in particular through the profiling of affected households and their needs and paying special attention to the particular circumstances of members of vulnerable groups during the second rounds of compensation payments. TANROADS will also ensure that all activities are implemented in a manner consistent with the TanTIP Gender-Based Violence Action Plan and the Vulnerable Groups Framework of 2022.			
6.1	Sub-Activity 6.1: During the disclosure of the compensation agreements to PAPs, the Social Safeguard Specialist will profile each PAPs to determine whether they are vulnerable.		Month 3-4	<ul style="list-style-type: none"><li>Social Safeguards Specialist</li><li>CLOS</li><li>Office Equipment</li><li>Vehicles</li><li>Operational Expenses Budget</li></ul>	1. Register of vulnerable households and female headed households.
6.2	Sub-Activity 6.2: The Social Safeguards Specialist will through interviews with vulnerable households, and in collaboration with village/local leadership, additional support measures that can be put in place. The additional support to vulnerable people should include (1) ensuring that women’s perspectives on compensation are obtained and factored into the compensation, (2) compensation payments are issued in the names of both spouses/ domestic partners, (3) ensure security of tenure, (4) raise awareness of the option of replacement housing.		Month 3-4		1. Record of additional support to be provided by TANROADS.
6.3	Sub-Activity 6.3: The Social Safeguards Specialist will ensure that any additional support measures are properly implemented, and TANROADS will ensure that any additional funds are made available.		Month 3-7		1. Record of additional support to be provided by TANROADS.
6.4	Sub-Activity 6.4: The Social Safeguards Specialist will ensure there is regular stakeholder engagement (see Point 3) with vulnerable households and women in particular, and well as ongoing monitoring (see Point 7).		Month 3-7		1. Record of engagement with vulnerable households and women in particular.
7	No monitoring was undertaken as required under the 2021 RAP.	General Objective: Internal monitoring will be undertaken by TANROADS during the second round of compensation. The monitoring parameters will be adopted from the 2021 RAP. Once the compensation process has concluded, TANROADS will appoint an independent resettlement specialist to undertake a Closure Audit.			

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No	Non-Compliance and Corrective Action	Timeline	Resources	Indicators
7.1	<b>Sub-Activity 7.1:</b> The Social Safeguard Specialist will undertake regular internal monitoring using parameters from the 2021 RAP. The results will be presented in bimonthly progress reports.	Month 1-7	<ul style="list-style-type: none"> <li>• Social Safeguards Specialist</li> <li>• CLOS</li> <li>• Office Equipment</li> <li>• Vehicles</li> </ul>	1. Bimonthly reports prepared by the Social Safeguards Specialist, to be submitted to WB on request.
7.2	<b>Sub-Activity 7.2:</b> TANROADs will appoint an independent resettlement specialist at the conclusion of the remedial actions to undertake a Closure Audit. The survey as part of closure planning will include a quantitative household survey as well as qualitative data sourced from interviews with key stakeholders and selected sample of PAPs.	Closure Stage	<ul style="list-style-type: none"> <li>• Operational Expenses Budget</li> <li>• Independent resettlement specialist / auditor for Closure Audit</li> </ul>	1. Preparation of the Closure Audit.
8	<i>The restoration of livelihoods has been through the payment of cash compensation only, and no livelihoods restoration programs was provided.</i>	<p><b><i>Remedial action in terms of livelihoods restoration is a challenge here is that the resettlement process is largely concluded and affected persons have had over two years to restore their housing and livelihoods. To retrospectively establish livelihood restoration programs after the fact would likely generate further disruptions as affected persons would have to readjust their livelihoods a second time.</i></b></p> <p><b><i>It is the recommendation of this audit, that no new programs be established, but rather the outstanding top-up payments be made. This will provide affected persons with additional funds to supplement the compensation they would have already spent on housing or land. Additionally, where the second round of consultations reveals PAPs, whose livelihoods have not been restored to pre-resettlement levels, TANROADS will provide technical assistance to support livelihood restoration to pre-resettlement levels for such PAPs.</i></b></p>		

In addition to the above recommendations, any future activities related to the second round of compensation payments should consider some of the Lessons Learned as summarized below:

1. While the 2021 RAP committed to Full Replacement Value, the Valuations and subsequent compensation payments are linked to Market Value. The second round of compensation should take great care in ensuring that compensation rates comply with both national law and ESS5.
2. While the 2021 RAP required a range of livelihoods restoration measures to be put in place, they were generic with little on-the-ground investigations. In addition, the RAP did not provide a suitable budget estimate or staffing requirements. This should be strengthened on future RAPs.
3. With respect to point 2, much of the livelihood restoration planning was deferred to the implementation phase. In such cases, sufficient resources (staffing, equipment and fundings) is required by TANROADS to develop and implement proper programmes as part of the implementation phase.
4. While the 2021 RAP committed to provide cash compensation or replacement housing, there was little understanding of this options by PAPs. On future projects there is a need to be more transparent with PAPs on these options with sufficient training and discussions provided to ensure PAPs understand the consequences of either option. This will ensure that they make an informed decision.
5. A key lesson learnt is that the implementation of any RAP needs to be supported by an appropriate on-site resettlement team. It is noted that in the 2021 RAP there is no separate cost item for a resettlement team, and often this results in the duties of the team being absorbed into the existing TANROADS organization. It is recommended that any future RAPs include budget for suitable professional staff to be appointed on a short-term basis.
6. It was found that much of the duties and functions of the Grievance Committees fell onto the local authorities. While many of the Grievance Committee members were very well meaning, it often came down to capacity and organizational management of the committees. Any future RAPs should include TANROADS as the secretariate of the committees, with the on-site resettlement team managing much of the day-to-day requirements of the committees.

## **4. Conclusion**

Our findings indicate that the compensation process has not been concluded as there are several monetary features which need to be addressed in addition to the final interest payment that all PAPs are still waiting for.

For the most part, the compensation process has followed the national standards, but is still lacking in meeting WB ESF requirements. Our data indicated that affected persons that have taken cash compensation have had mixed results in terms of establishing new and completed houses, as well as securing replacement farmland. It is important to note that in several cases, affected persons have had to use savings or sell assets to construct new homes, or cross-subsidized it from farmland compensation.

To finalize the compensation process, a series of correct actions have been recommended. This mostly covers the payment of additional top-up compensation covering outdated crop rates and the depreciation rate applied to affected peoples housing as well as the outstanding interest payment (which is applicable to all PAPs). This further compensation top up would satisfy the World Banks standard to 'replacement value' compensation, and in doing so would settle many outstanding grievances.

It is also our recommendation that a specialist Task force is formed to reopen the grievance mechanism while the top-up compensation is being paid, in order to record and attempt to resolve any outstanding grievances. The Task Force would also be responsible for ensuring that a GBV strategy is implemented, and special attention be given to vulnerable people.



## 5. APPENDIX

### 5.1. Appendix A – Request for Information

No.	Document Name	Status				
		N/A	None	Draft Doc	Final Doc	Sourced
1. Documentation						
1.1	Final RAP Report					X
1.2	Eligible Persons / Affected Persons List				X	X
	Socio-Economic Survey Form / Raw Data		X			
1.3	Asset Inventories / Valuation Reports / Detailed Measurement Surveys				X	X
1.4	Record of All Stakeholder Engagement (Minutes and Registers)		X			
1.5	Record of All Signed Offer Letters / Contracts				X	X
1.6	Records of Compensation Payments (Transmittals, Signed Confirmation)				X	X
1.7	Records of any Land / Property Handover Agreements	X				
1.8	Copy of the Grievance Mechanism / Procedure				X	X
1.9	Detailed Record of Lodged Grievances				X	X
1.10	Detailed Record of Corrective Actions				X	X
1.11	RAP Implementation Budget				X	X
1.12	RAP Monitoring & Audit Reports, Data or Records		X			

### 5.2. Appendix B – Consolidated PAP List

No.	Val. Number	Name	Location	Displacement	Graves
1	VAL/KRT/KLJ/MARP/001	LOTA SINDIYO GALESON	KILIMAMOJA	Physical	
2	VAL/KRT/KLJ/MARP/2	NICODEMUS SIMON MAYOMBA	KILIMAMOJA	Physical	
3	VAL/KRT/KLJ/MARP/5	ADIEL GEORGE MOLLEL	KILIMAMOJA	Physical	
4	VAL/KRT/KLJ/MARP/7	MICHAEL DANIEL BAYYO	KILIMAMOJA	Physical	1
5	VAL/KRT/KLJ/MARP/9	LUCY PETER SILLO	KILIMAMOJA	Physical	
6	VAL/KRT/KLJ/MARP/10	SALIM JOHN SALIM NA SESILIA BENEDICT AKONAAY	KILIMAMOJA	Physical	
7	VAL/KRT/KLJ/MARP/13	PETRO GAUDENSI KIIMAY	KILIMAMOJA	Physical	
8	VAL/KRT/KLJ/MARP/15	IDDI MHINA MTILI	KILIMAMOJA	Economic	
9	VAL/KRT/KLJ/MARP/16	IDDI MHINA MTILI	KILIMAMOJA	Economic	
10	VAL/KRT/KLJ/MARP/19	NKOE APALILIA MBISE	KILIMAMOJA	Physical	
11	VAL/KRT/KLJ/MARP/20	NKOE APALILIA MBISE	KILIMAMOJA	Economic	
12	VAL/KRT/KLJ/MARP/21	NKOE APALILIA MBISE	KILIMAMOJA	Economic	
13	VAL/KRT/KLJ/MARP/22	NKOE APALILIA MBISE	KILIMAMOJA	Economic	
14	VAL/KRT/KLJ/MARP/23	JUMA SULAIMAN JAPHARY	KILIMAMOJA	Physical	
15	VAL/KRT/KLJ/MARP/25	JOSEPH STANLEY HHAWAY	KILIMAMOJA	Physical	
16	VAL/KRT/KLJ/MARP/26	BAHATI BAKARI HIZZA	KILIMAMOJA	Physical	

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17	VAL/KRT/KLJ/MARP/27	SABAS JOHN GARA	KILIMAMOJA	Physical	
18	VAL/KRT/KLJ/MARP/29	PATRICK MICHAEL SARWATY	KILIMAMOJA	Economic	
19	VAL/KRT/KLJ/MARP/30	VICKY M. MUHALE	KILIMAMOJA	Physical	1
20	VAL/KRT/KLJ/MARP/31	VICKY M. MUHALE	KILIMAMOJA	Economic	
21	VAL/KRT/KLJ/MARP/33	JOHN BASKI MAKO	KILIMAMOJA	Physical	2
22	VAL/KRT/KLJ/MARP/34	CLARA PIUS TSAXARA	KILIMAMOJA	Physical	
23	VAL/KRT/KLJ/MARP/35	WILBROD PAULO MASSAY	KILIMAMOJA	Physical	
24	VAL/KRT/KLJ/MARP/36T	WILBROD PAULO MASSAY	KILIMAMOJA	Economic	
25	VAL/KRT/KLJ/MARP/37	GRACE ADIEL MNZAVA	KILIMAMOJA	Physical	
26	VAL/KRT/KLJ/MARP/38	LUCAS BAYO ANNEY	KILIMAMOJA	Physical	
27	VAL/KRT/KLJ/MARP/39	GRASIAN P. LYIMO	KILIMAMOJA	Physical	1
28	VAL/KRT/KLJ/MARP/40	HELENA STEPHANO GWAU	KILIMAMOJA	Physical	
29	VAL/KRT/KLJ/MARP/46	SAFARI SULUMBU ISAAY	KILIMAMOJA	Physical	
30	VAL/KRT/KLJ/MARP/54	YUSUFU SAIDI HASANI	KILIMAMOJA	Economic	
31	VAL/KRT/KLJ/MARP/55	EMANUEL NDETAULWA MBISE	KILIMAMOJA	Physical	
32	VAL/KRT/KLJ/MARP/56	TLIGAY TULWAY AMNAAY	KILIMAMOJA	Physical	1
33	VAL/KRT/KLJ/MARP/58	PROSPER JUMANNE SUMNI	KILIMAMOJA	Economic	
34	VAL/KRT/KLJ/MARP/59	BENINA POTINI MARGWE	KILIMAMOJA	Physical	
35	VAL/KRT/KLJ/MARP/62	MARTINA QADWE NG 'ADI	KILIMAMOJA	Physical	
36	VAL/KRT/KLJ/MARP/63	ELIEZA EDWARD MBWAMBO	KILIMAMOJA	Physical	1
37	VAL/KRT/KLJ/MARP/65	EMANUEL DAHAYE MUNGI	KILIMAMOJA	Physical	
38	VAL/KRT/KLJ/MARP/66	REHEMA MOHAMEDI AKONAAY	KILIMAMOJA	Economic	5
39	VAL/KRT/KLJ/MARP/67	SAFARI SULUMBU ISAAY	KILIMAMOJA	Physical	
40	VAL/KRT/KLJ/MARP/68	LAISER LEDARANYA LAISER	KILIMAMOJA	Physical	
41	VAL/KRT/KLJ/MARP/69	JOSEPHAT P. GWANDU	KILIMAMOJA	Economic	
42	VAL/KRT/KLJ/MARP/70	SALLY DAKHO MALLEY	KILIMAMOJA	Physical	
43	VAL/KRT/KLJ/MARP/71	THERESIA E. YOHANA	KILIMAMOJA	Physical	3
44	VAL/KRT/KLJ/MARP/79	YUSUFU SAIDI HASANI	KILIMAMOJA	Economic	
45	VAL/KRT/KLJ/MARP/80	JOHN LONG LORRY	KILIMAMOJA	Physical	
46	VAL/KRT/KLJ/MARP/82	ZUBEDA MIGIRE SULLEY	KILIMAMOJA	Physical	
47	VAL/KRT/KLJ/MARP/83	FABIAN ALBIN KEMBE	KILIMAMOJA	Economic	
48	VAL/KRT/KLJ/MARP/85	JACOB QAMARA GILAGO	KILIMAMOJA	Economic	
49	VAL/KRT/KLJ/MARP/87	ISRAEL DAVID LULU	KILIMAMOJA	Physical	
50	VAL/KRT/KLJ/MARP/88	DAUDI ROBERT MAPUGA	KILIMAMOJA	Economic	2
51	VAL/KRT/KLJ/MARP/90	PETROLINA MARCO KWASLEMA	KILIMAMOJA	Economic	
52	VAL/KRT/KLJ/MARP/91	AMINA BAKARI MWINJUMA	KILIMAMOJA	Physical	3
53	VAL/KRT/KLJ/MARP/92	EVA YONA MALLYA	KILIMAMOJA	Physical	1
54	VAL/KRT/KLJ/MARP/93	PRIVER JOHN KIMARO	KILIMAMOJA	Economic	
55	VAL/KRT/KLJ/MARP/95	REHEMA AUGUSTINO SARWAT	KILIMAMOJA	Physical	1
56	VAL/KRT/KLJ/MARP/100	JOHN PETER SANDAY	KILIMAMOJA	Economic	
57	VAL/KRT/KLJ/MARP/101	CHRISTINA HUMPHREY MALLEY	KILIMAMOJA	Physical	
58	VAL/KRT/KLJ/MARP/102	DANIEL PHILIPO SIMPA	KILIMAMOJA	Physical	
59	VAL/KRT/KLJ/MARP/103	MELKIZEDECK AWET AKONAAY	KILIMAMOJA	Physical	
60	VAL/KRT/KLJ/MARP/104	JOSEPHAT MARGWE MOMOYA	KILIMAMOJA	Physical	1
61	VAL/KRT/KLJ/MARP/106	URSULA MUSSO TAISHO	KILIMAMOJA	Physical	3
62	VAL/KRT/KLJ/MARP/108	AGNESS SACTAY TSINGAY	KILIMAMOJA	Economic	

63	VAL/KRT/KLJ/MARP/109	HAPPY JUSTINE KIWALE	KILIMAMOJA	Physical	
64	VAL/KRT/KLJ/MARP/110	JOSEPHINE JOHN YAMAY	KILIMAMOJA	Physical	
65	VAL/KRT/KLJ/MARP/111	SAMWEL PETER AMNAAY	KILIMAMOJA	Physical	
66	VAL/KRT/KLJ/MARP/112	NKOE APALILIA MBISE	KILIMAMOJA	Economic	
67	VAL/KRT/KLJ/MARP/113	YONA CIPRIAN SULLE	KILIMAMOJA	Physical	
68	VAL/KRT/KLJ/MARP/114	NEEMA THOMAS GWAKU	KILIMAMOJA	Physical	1
69	VAL/KRT/KLJ/MARP/119	DAMIAN GAUDENCE GWASMA	KILIMAMOJA	Physical	
70	VAL/KRT/KLJ/MARP/120	PHILIPO MARGWE SALAHO	KILIMAMOJA	Physical	1
71	VAL/KRT/KLJ/MARP/121	YUSTA LUSIAN LOHAY	KILIMAMOJA	Physical	
72	VAL/KRT/KLJ/MARP/122	GRACE ANDREA MALINGA	KILIMAMOJA	Economic	
73	VAL/KRT/KLJ/MARP/123	FOCUS PETER AMNAAY	KILIMAMOJA	Physical	
74	VAL/KRT/KLJ/MARP/124	GERALD DAWSON LEMA	KILIMAMOJA	Economic	
75	VAL/KRT/KLJ/MARP/125	AMIRY SHOMARY ATHUMANI	KILIMAMOJA	Economic	
76	VAL/KRT/KLJ/MARP/127	LYDIA CYPRIAN SULLE	KILIMAMOJA	Economic	
77	VAL/KRT/KLJ/MARP/131	MAGRETH MIHINDI BAYO	KILIMAMOJA	Physical	
78	VAL/KRT/KLJ/MARP/132	ALBIN KEMBE QORRO	KILIMAMOJA	Physical	1
79	VAL/KRT/KLJ/MARP/133	AKLEI SIXMUND SAYNA	KILIMAMOJA	Economic	
80	VAL/KRT/KLJ/MARP/134	FRANCISCO PETER SULLEY	KILIMAMOJA	Physical	
81	VAL/KRT/KLJ/MARP/135	BERTILA MARTIN DUWE	KILIMAMOJA	Economic	
82	VAL/KRT/KLJ/MARP/136	PRISCA IGNATION SINGANO	KILIMAMOJA	Physical	
83	VAL/KRT/KLJ/MARP/137	SAPHINA MIRAJI MCHOMVU	KILIMAMOJA	Physical	
84	VAL/KRT/KLJ/MARP/138	ZAKAYO SHIKAEL MUSHI	KILIMAMOJA	Economic	
85	VAL/KRT/KLJ/MARP/139	YUSUFU SAIDI HASANI	KILIMAMOJA	Economic	
86	VAL/KRT/KLJ/MARP/140	REHEMA MOHAMED AKONAAY	KILIMAMOJA	Economic	
87	VAL/KRT/KLJ/MARP/144	ISAAY JOHN ISAAY	KILIMAMOJA	Economic	
88	VAL/KRT/KLJ/MARP/145	LINAH D SHIRIMA	KILIMAMOJA	Economic	
89	VAL/KRT/KLJ/MARP/146	MIRIUM PETER LYIMO	KILIMAMOJA	Economic	
90	VAL/KRT/KLJ/MARP/147	NYERERE BURE NONAY	KILIMAMOJA	Economic	
91	VAL/KRT/KLJ/MARP/148	JOHN LONG LORRY	KILIMAMOJA	Economic	
92	VAL/KRT/KLJ/MARP/149	EMANUEL ELIABU RINGO	KILIMAMOJA	Physical	
93	VAL/KRT/KLJ/MARP/151	NAOMI GILBERT DAFFA	KILIMAMOJA	Economic	
94	VAL/KRT/KLJ/MARP/153	ISACK KUMBWAEI KANUYA	KILIMAMOJA	Physical	
95	VAL/KRT/KLJ/MARP/154	SALUM KAMBI OMARY	KILIMAMOJA	Economic	
96	VAL/KRT/KLJ/MARP/160	ALBERTO MAGANGA MALECHELA	KILIMAMOJA	Physical	
97	VAL/KRT/KLJ/MARP/161	MASJID JABER BIN ZAID	KILIMAMOJA	Physical	
98	VAL/KRT/KLJ/MARP/162	FATINA MOHAMED PANGA	KILIMAMOJA	Physical	
99	VAL/KRT/KLJ/MARP/163	GODSON JOHN MBISE	KILIMAMOJA	Physical	
100	VAL/KRT/KLJ/MARP/164	TUMAINI JUMANNE HASSANI	KILIMAMOJA	Physical	
101	VAL/KRT/KLJ/MARP/167	JOSEPH NG'AIDA MASANGW	KILIMAMOJA	Physical	
102	VAL/KRT/KLJ/MARP/168	MATHIAS MICHAEL KAAYA	KILIMAMOJA	Physical	
103	VAL/KRT/KLJ/MARP/169	JUDITH ALBERT KAAYA	KILIMAMOJA	Physical	
104	VAL/KRT/KLJ/MARP/170	JOSEPH BOI TANGO	KILIMAMOJA	Physical	
105	VAL/KRT/KLJ/MARP/172	EMMANUEL SORAEI KANUYA	KILIMAMOJA	Physical	
106	VAL/KRT/KLJ/MARP/173	MAGRETH IBRAHIM MJEMA	KILIMAMOJA	Physical	
107	VAL/KRT/KLJ/MARP/174	IBRAHIM CHARLES BUKWIMBA	KILIMAMOJA	Physical	
108	VAL/KRT/KLJ/MARP/175	DANIEL ZAKARIA SULLE	KILIMAMOJA	Physical	

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109	VAL/KRT/KLJ/MARP/176	DANIEL ZAKARIA SULLE	KILIMAMOJA	Economic	
110	VAL/KRT/KLJ/MARP/177	ANNA ADIEL MNZAVA	KILIMAMOJA	Economic	
111	VAL/KRT/KLJ/MARP/178	NYERERE NDWALA OROMO	KILIMAMOJA	Physical	1
112	VAL/KRT/KLJ/MARP/179	ESAU HHAYUMA AMNINA	KILIMAMOJA	Physical	
113	VAL/KRT/KLJ/MARP/180	ANDREA GWANDawe SULE	KILIMAMOJA	Economic	
114	VAL/KRT/KLJ/MARP/181	ELIHURUMA WALTER MSUYA	KILIMAMOJA	Physical	
115	VAL/KRT/KLJ/MARP/182	MARIA JOHN MAKAMBA	KILIMAMOJA	Physical	
116	VAL/KRT/KLJ/MARP/185	VICTOR FAUSTINE KAMAZIMA	KILIMAMOJA	Economic	
117	VAL/KRT/KLJ/MARP/186	HAMISI SEVERINI KUSENGE	KILIMAMOJA	Economic	
118	VAL/KRT/KLJ/MARP/187	ALEX JUDIKA AKIOO	KILIMAMOJA	Physical	
119	VAL/KRT/KLJ/MARP/17	ANGELA JOSEPH ARUSHI	KILIMAMOJA	Physical	
120	VAL/KRT/KLJ/MARP/24	ELIZABETH GEOFFREY MAMMBA	KILIMAMOJA	Economic	
121	VAL/KRT/KLJ/MARP/32	PETRO HAYSHI BARI	KILIMAMOJA	Physical	1
122	VAL/KRT/KLJ/MARP/36	WILBERD ELIMRINGI KAWICHE	KILIMAMOJA	Economic	
123	VAL/KRT/KLJ/MARP/41	JOSEPH TUHERY MKUNDE	KILIMAMOJA	Economic	
124	VAL/KRT/KLJ/MARP/42	MARTHA DEEMAY TLATLAA	KILIMAMOJA	Physical	2
125	VAL/KRT/KLJ/MARP/48	JOSEPH TUHERY MKUNDE	KILIMAMOJA	Economic	
126	VAL/KRT/KLJ/MARP/51	GWAATEMA P. HHAYUMA	KILIMAMOJA	Physical	
127	VAL/KRT/KLJ/MARP/52	SAULY GOODLUCK MLAY	KILIMAMOJA	Physical	
128	VAL/KRT/KLJ/MARP/57	JULITA C. BURA	KILIMAMOJA	Physical	
129	VAL/KRT/KLJ/MARP/64	SELINA A. SEMFUA	KILIMAMOJA	Physical	
130	VAL/KRT/KLJ/MARP/72	FARAJA GUSTAVI MOSHI	KILIMAMOJA	Physical	
131	VAL/KRT/KLJ/MARP/74	JOHN IGINATIO SINGANO	KILIMAMOJA	Physical	
132	VAL/KRT/KLJ/MARP/81	JOSHUA IBRAHIM SULLE	KILIMAMOJA	Economic	
133	VAL/KRT/KLJ/MARP/82T	SERIKALI YA KIJIKI CHA KILIMAMOJA	KILIMAMOJA	Physical	
134	VAL/KRT/KLJ/MARP/98	SIXON BURA HAMAD	KILIMAMOJA	Economic	
135	VAL/KRT/KLJ/MARP/99	LOHAY BURA HAMAD	KILIMAMOJA	Physical	
136	VAL/KRT/KLJ/MARP/105	PHILIP KALI-I MALLE	KILIMAMOJA	Physical	
137	VAL/KRT/KLJ/MARP/107	AUGUSTINO BONIFACE MOSHI	KILIMAMOJA	Physical	1
138	VAL/KRT/KLJ/MARP/129	OMARI M. NYUMBA	KILIMAMOJA	Economic	
139	VAL/KRT/KLJ/MARP/141	THOMAS ANDREA MALINGA	KILIMAMOJA	Physical	
140	VAL/KRT/KLJ/MARP/156	ANTONI UMBE BAOY	KILIMAMOJA	Physical	
141	VAL/KRT/KLJ/MARP/158	FARIDA MOHAMED AKONAAY	KILIMAMOJA	Economic	
142	VAL/KRT/KLJ/MARP/28	ADELINE JOHN GARA	KILIMAMOJA	Economic	
143	VAL/KRT/KLJ/MARP/3	JULIUS AMMI NA JULIANA JULIUS AMMI	KILIMAMOJA	Economic	
144	VAL/KRT/KLJ/MARP/11	ZAKAYO SHIKAEL MUSHI NA FABIOLA DANIEL IRAFAY	KILIMAMOJA	Economic	
145	VAL/KRT/KLJ/MARP/14	KUBURI SAIDI BORAKUPATA	KILIMAMOJA	Physical	
146	VAL/KRT/KLJ/MARP/44	ASHA JUMA NYUNGWA	KILIMAMOJA	Physical	
147	VAL/KRT/KLJ/MARP/49	MICHAEL DANIEL BAYYO	KILIMAMOJA	Economic	
148	VAL/KRT/KLJ/MARP/75	MATIAS M. KAAYA	KILIMAMOJA	Economic	
149	VAL/KRT/KLJ/MARP/76	FARAJA GUSTAVI MOSHI NA FATINA MOHAMED PANGA	KILIMAMOJA	Physical	
150	VAL/KRT/KLJ/MARP/84	JACKSON EMMANUEL KANUYA	KILIMAMOJA	Physical	
151	VAL/KRT/KLJ/MARP/94	MAGRETH MIHINDI BAYO	KILIMAMOJA	Physical	
152	VAL/KRT/KLJ/MARP/159	RAPHAEL STEVIN NGILIA	KILIMAMOJA	Physical	
153	VAL/KRT/KLJ/MARP/165	JOSEPH NANGAY DAUDI NA VERONICA DAUDI HAILAKWAHI	KILIMAMOJA	Physical	

154	VAL/KRT/KLJ/MARP/171	MATHIAS MICHAEL KAAYA	KILIMAMOJA	Physical	
155	VAL/KRT/KLJ/MARP/4	MWINGA YUSTUS MANGWANGI	KILIMAMOJA	Economic	
156	VAL/KRT/KLJ/MARP/77	GEORGE MGANGA MALECHELA	KILIMAMOJA	Physical	1
157	VAL/KRT/KLJ/MARP/86	HELEN S SULE	KILIMAMOJA	Economic	
158	VAL/KRT/KLJ/MARP/89	JOSEPH BURA RAHHI	KILIMAMOJA	Economic	3
159	VAL/KRT/KLJ/MARP/43	ANNA PETER AMUNAAY	KILIMAMOJA	Economic	3
160	VAL/KRT/KLJ/MARP/60	MARTHA ABAS KHATIBU	KILIMAMOJA	Physical	1
161	VAL/KRT/KLJ/MARP/78	CLARA HUSSEN WAREE	KILIMAMOJA	Economic	
162	VAL/KRT/KLJ/MARP/96	PAULINA HIITI MATHIAS	KILIMAMOJA	Economic	
163	VAL/KRT/KLJ/MARP/97	NAOMI MARMO MUHALE	KILIMAMOJA	Physical	
164	VAL/KRT/KLJ/MARP/115	ERASMUS LAURENT TESHA	KILIMAMOJA	Economic	
165	VAL/KRT/KLJ/MARP/117	LUCIA ERRO MALE	KILIMAMOJA	Economic	
166	VAL/KRT/KLJ/MARP/118	ERASMUS LAURENT TESHA	KILIMAMOJA	Economic	
167	VAL/KRT/KLJ/MARP/126	GODLISTEN JOSEPH MMBANDO	KILIMAMOJA	Economic	
168	VAL/KRT/KLJ/MARP/128	JULITA CLEMENT IZDORI	KILIMAMOJA	Physical	1
169	VAL/KRT/KLJ/MARP/130	JACOB KEMBE QORRO	KILIMAMOJA	Physical	
170	VAL/KRT/KLJ/MARP/183	JOHNSON EMMANUEL KANUYA	KILIMAMOJA	Physical	
171	VAL/KRT/KLJ/MARP/155	SEILIA PATRICK HHAYUMA	KILIMAMOJA	Economic	
172	VAL/KRT/KLJ/MARP/166	SHAIBU AMIRI MSANGI	KILIMAMOJA	Economic	
173	VAL/KRT/KLJ/MARP/184	JULIAS EMMANUEL KANUYA	KILIMAMOJA	Economic	
174	VAL/KRT/KLJ/MARP/150	MARY EMANUEL RINGO	KILIMAMOJA	Economic	
175	VAL/KRT/KLJ/MARP/157	FANUEL LAURENT HHADO	KILIMAMOJA	Economic	
176	VAL/KRT/KLJ/MARP/116	JOHN THOMAS GWAKU	KILIMAMOJA	Physical	
177	VAL/KRT/KLJ/MARP/50	NICODEMUS ADREA TLUWAY	KILIMAMOJA	Physical	2
178	VAL/KRT/KLJ/MARP/8	AMINIELI MICHAELI BAYYO	KILIMAMOJA	Physical	
179	VAL/KRT/KLJ/MARP/45	IDDA PETRO AMNAAY	KILIMAMOJA	Economic	
180	VAL/KRT/KLJ/MARP/12	SIPRIAN FABIANO JACOB	KILIMAMOJA	Physical	1
181	VAL/KRT/KLJ/MARP/18	REGNARD ALBIN KEMBE	KILIMAMOJA	Physical	
182	VAL/KRT/KLJ/MARP/73	ERASMUS LAURENT TESHA	KILIMAMOJA	Physical	
183	VAL/KRT/KLJ/MARP/61	PASKAL MOSHA	KILIMAMOJA	Physical	
184	VAL/KRT/KLJ/MARP/143	HABARI NODE LTD	KILIMAMOJA	Economic	
185	VAL/KRT/KLJ/MARP/53	BERTHA BABA LULU	KILIMAMOJA	Physical	
186	VAL/KRT/KLJ/MARP/047	WINNER KITEMBE MSEMBO	KILIMAMOJA	Economic	
187	VAL/KRT/KLJ/MARP/6	PAULO LALI DEENGW	KILIMAMOJA	Physical	2
187	VAL/KRT/KLJ/MARP/188	SANARE KOIYE	KILIMAMOJA	Economic	
187	VAL/KRT/KLJ/MARP/189	ABOUTWALIB GUNDA	KILIMAMOJA	Economic	

### 5.3. Appendix C – Interview Guiding Questions

No.	Interview Question	Response
1	<b>TANROADS (Social Safeguards Officer or similar position) or RAP Implementation Team</b>	
A	Please assist in the provision of details records/information/data need to support the audit as per the Request for Information. <i>(Photos or copies of the relevant hardcopies are to be made to append to the Audit Report, otherwise secure softcopies)</i>	Done.
B	Please provide an overview of how the RAPs were developed, authorised by local authorities and the World Bank, and finally the implementation arrangements (This information should be sufficient to prepare a timeline of activities)	Valuation was done in February 2020, compensation was paid in November 2021, supplementary valuation done in November 2021 and payment for supplementary done immediately thereafter. Interest valuation was done in December 2022 and not yet paid, pending Ministry of Finance approval and provision of funds.
C	What measures were put in place, to avoid/minimise the impacts of resettlement through project design during the planning of the projects?	We are not aware of such measures, and the design engineer for the project is no longer working at regional office.
D	Where there any situations where there were PAPs with contested land ownership claims (such as squatters) or people that were generally not recognised by the local authorities and communities?	There was one case of a foreigner who tried to claim compensation which is not legal in Tanzania. The case was referred to the District for investigation. The foreign owner left the country, and the land was surrendered to government.
E	Did the Project ever need to resort to forced evictions of PAPs – or the permanent or temporary removal against the will of persons without the provision of, and access to, appropriate forms of legal and other protections including ESS 5?	No.
F	With respect to the loss of land, did the Project offer only cash or did it also offer replacement land as an option to PAPs? Please describe what the PAPs selected and if any problems were found during implementation with their choice.	No, only cash offered.
G	With respect to the loss of land, please describe how replacement land (if any) was secured for PAPs (i.e., did TANROADS buy land, or rely on local authorities). How many PAPs took this option and what problems were found during implementation with their choice.	N/A

No.	Interview Question	Response
H	With respect to the loss of residential/business/other structures, did the Project offer only cash or did it also offer replacement buildings as an option to PAPs? Please describe what the PAPs selected and if any problems were found during implementation with their choice.	Only cash offered.
I	With respect to the loss of residential/business/other structures, did the Project build new replacement building on behalf of the PAPs, or was it up to PAPs to build their own new homes. Have PAPs already constructed their new homes or is this still being done.	No, only cash offered.
J	With respect to the payment of all cash compensation, were offer documents/contract provided to each PAP and were they signed and appropriately files (secure copies of the contracts if available).	A form was signed which contained legal terms and conditions.
K	What is the status of the payment of compensation (i.e., it is complete, still underway), and are there any outstanding compensation payments? If yes, how many outstanding payments are there, and what is being done to resolve these outstanding payments?	Everyone has been compensated for the initial and supplementary valuations. The interest valuation has not been paid, pending approval by Ministry of Finance.
L	Have there been instances where PAPs were required to give up their land or structures, prior to the payment of compensation, allowances, and provision of resettlement support? If yes, please explain in more detail what happened.	No.
M	Please describe the livelihoods restoration programmes that were initiated during the implementation of the RAP (including implementation agency, budget, type, beneficiary details and other relevant information).	No livelihood programs were done. Financial awareness was done by local authorities (evidence could not be provided of this, and it was claimed that minutes were taken but these were not provided).
N	What is the status of the various livelihood restoration programmes (concluded, active, inactive) and what are the expected number of PAP beneficiaries for each programme?	Not applicable.
O	Does the Project have a list of vulnerable households, and please describe how these households were identified as vulnerable? (Obtain a copy of this list if available)	No.

No.	Interview Question	Response
P	Please describe the additional types of support provided to vulnerable households (including issues of gender, gender-based violence) during the implementation of the RAP.	No additional support for vulnerables was provided.
Q	Please provide a summary of the stakeholder engagement undertaken during the preparation of the RAP, as well as during the implementation phase of the RAP (obtain meeting records, minutes, and registers)	The valuer engaged the PAPs to make them aware of the valuation and compensation process, and to disclose the rates that would be applied to the assets.
R	During the implementation phase of the RAP did the Project setup a resettlement committee (or similar) or have means for PAPs to contact the Project directly (i.e., CLOs, phone number etc.)?	No specific resettlement forum was created for engagement. Engagement was undertaken by arranging meetings through the Ward, Village and Street leaders. A grievance committee was formed at local level, made up of village and street representatives, and at the District level for escalation of grievances that could not be resolved locally. PAPs had the phone number of the TANROADS accountant and would contact her directly to enquire about status of compensation.
S	Does the Project have a functional Grievance Mechanism, and please provide a record of all lodged grievances (including both closed and open grievances). Please provide a summary of what most of the grievances were about.	A grievance mechanism exists as explained above.
T	What monitoring, progress reporting and audits have been undertaken during the development and implementation of the RAPs (obtain copies of any monitoring data, reports, or audits).	No monitoring studies have been undertaken, apart from a World Bank reconnaissance visit.
2	<b>GBV/SEA Implementation Team (this forum did not exist and so these questions were not asked).</b>	
A	Does the Project have a Gender Plan (or similar) in place? (Obtain a copy of the Gender Plan and other relevant information) Please provide a summary of how gender plans and the RAPs collaborate.	N/A
B	Does the Gender Plan make any special provision for safeguarding women and women-headed households during the resettlement and compensation process, or does it rely on the RAPs, or collaboration between the Gender and RAP teams?	N/A
C	Are there any recorded incidents of Gender-Based-Violence or Sexual Abuse and Exploitation (GBV/SEA) that are directly related to the implementation of the resettlement and compensation process?	N/A



No.	Interview Question	Response
D	Please provide your thoughts on any gender issues that were seen during the implementation of the resettlement and compensation process, that were perhaps not recorded, or are not directly considered GBV/SEA, but may be general gender challenges.	N/A
E	With respect to the above gender issues, did the Gender the RAP teams, put in any special measures to address these issues? If yes, please provide more detail on these measures.	N/A
F	Does the team include a record of individual PAPs or Households where there were gender issues, or where they provided additional gender support? (Obtain a copy of the records if possible, or summarise verbally)	N/A
G	Does the Project have a GBV-sensitive GRM in place, and was it available prior to the land acquisition and resettlement process?	N/A
H	Has the team received or seen any resettlement-related grievances or general complaints that have a gender aspect (i.e., wife not being part of the consultation, women losing access to land and livelihoods, abuse of compensation etc.) (Obtain a copy of the grievance if possible, or summarise verbally)	N/A
<b>3</b>	<b>Resettlement Grievance Committee</b>	
A	Is the Resettlement Grievance Committee fully functional and been available to PAPs during the implementation of the resettlement process? If yes, please provide a summary of the functions, rules, and members of the committee.	<p>Committee was founded before the payment but after the valuation of the properties and assets.</p> <p>TANROADS came and hosted a meeting with all PAPs communicating the forming of the Grievance committee, which included Ward executive officer, nominated as chairperson, 1 x PAP representative, 1x religious leader, 1 x hamlet member, 1x special seat for women empowerment/ward council Note: There was no NGO representation on the committee.</p> <p>Grievance Process as described by committee:</p> <ol style="list-style-type: none"> <li>1. Grievance must be received in writing</li> <li>2. Grievance review and escalated one case by case basis.</li> </ol> <p>The committee indicated that they received a total of 23 grievances of which 9</p>

No.	Interview Question	Response
		<p>were escalated to the district level.</p> <p>A common grievance and concern was that in most cases a male head of household was due to be receive the entirety of the compensation and spouses were concerned about abandonment which was resolved by a joint banking solution.</p> <p>There were also a large number of complaints that the compensation monies were not sufficient, and the valuation was less than what PAPs felt was expected or fair. In addition to some of their assets being left of the valuation such as orchard trees and cattle.</p> <p>PAPs felt like were being pressured into signing off the valuation of their assets on the computer without really understanding what they were signing or how the calculations were made. This was a recurring theme throughout the interview, as the valuer and valuation being the primary source of grievance. It also transpired in the follow up questioning that the valuation figure that was given to the PAP by the valuer on the computer was ultimately different to what was paid out later. Allegedly this was due to the impact of COVID 19 and depreciation of assets between valuation and payment, and this was not thoroughly communicated and explained to PAPs. <b>This was by far the biggest grievance among PAPs, the reduction in the valuation of their assets as a result of COVID 19, economic recession and depreciation.</b></p> <p>One committee member and PAP raised the allegation that the Ward had not been keeping accurate enough records of the grievances and announced that there had been in excess of 34 complaints submitted to the Ward, which conflicts with Ward records.</p> <p>It became clear at this point that the Ward did not have the authority address monetary complaints and solutions and everything of this nature was escalated to the District. Grievances at Ward level were more focused on understanding land ownership disputes.</p>

No.	Interview Question	Response
B	How are PAPs able to lodge a grievance with the committee (i.e., phone call, speaking to chief etc.)? Are PAPs able to approach TANROADS or the World Bank directly?	PAPs were only able to lodge grievance through written application at Ward level which were escalated on a case-by-case basis.
C	Does the grievance committee have alternative means for women or vulnerable people to lodge a grievance, that is more sensitive to their needs? If yes, please provide a short summary of how this is done.	No, it was the same process for everyone. PAPs were required to come into the office and submit their grievance in writing.  Note: 4 PAPs died throughout the process, and the committee supported the family, although no detail was provided as to what that support looked like.
D	Does the committee have a record of all grievances (including those that are open and closed) that have been reported to the committee? (Obtain a copy of the grievance records if possible, or summarise them verbally)	This was wildly contested and disputed by Ward member and PAPs, that the Ward were not diligent or accurate enough in their tracking of grievances. All available documentation was captured and can be found in the appendix.
E	Please provide a quick summary of the types of grievances received by the committee, how serious the grievances were and how they were resolved. (Explore the various grievances and responses in follow-up questions)	The most common grievance was that PAPs did not feel that the valuation of their assets was sufficient, and the valuation amount and payment amount were different, and that the reasoning behind this was not explained sufficiently.
F	Have there been any serious grievances that needed to be escalated to (1) the courts, (2) governor's office, or (3) TANROADS/World Bank? If yes, please provide a summary of the grievance and why it was serious.	Only 1 grievance was taken to the courts, and this was disputing the reduced valuation amount because of economic recession and COVID 19. This is evidenced in the documentation in the appendix.
G	Are there any grievances that are outstanding or how not been fully resolved to the satisfaction of the PAP that made the grievance? If yes, please provide the records or summary of the outstanding grievances.	This is a highly contested issue within the grievance mechanism. The Ward level Grievance Committee maintain that out of all the grievances that were submitted to the Ward, all of them were either resolved or escalated to the District, therefore they would maintain that there are no grievances at Ward level.  However, after only 2 committee meeting it was decided that the committee would be dissolved and at the final 3rd meeting, 34 grievances were raised. It was also noted that at this stage the District committee made the decision to stop responding to grievances in writing to discourage people launching lawsuits in court.

No.	Interview Question	Response
H	Other notes	<p>One of the Grievance committee weaknesses was that it could not give proper responses at the Ward level due to the lack of experts and specialist represented on the committee.</p> <p>It also became evident throughout the interview that Committee decision were made without full committee member attendance.</p> <p>There were several questions surrounding the status of the outstanding interest payment, as PAPs have not been kept updated with this.</p>
4	<b>District Chief Valuers Office</b>	
A	Consistent with the law, was your office able to review and authorised the Valuation Reports that formed part of the RAPs? If yes, how did you find the quality of the reports and were they consistent with land acquisition law?	The Valuer explained that the exercise was conducted according to the law. He is not aware of RAP. The report was written by the Valuer and reviewed and approved by the Chief Valuer after which it was submitted to TANROADS for comments which were responded by the office of the Chief Valuer. The final report was approved by the Chief Valuer and submitted to TANROADS.
B	Did the valuers determine the compensation rates included in the Valuation Reports, or did they request rates from your office? If the former, how did the valuer work out the compensation rates? If the latter, how did your office work out the compensation rates?	Compensation rates was according to the law as stipulated in the government schedules. The valuers used the rate of TZS 6,000/= per square meter (rate of 2018). It based on the selling price of the land in the specific area.
C	Were the final compensation rates based on <i>market value</i> (as required under national law) of <i>full replacement value</i> (as required by the World Bank standards). If it was <i>market value</i> , how different would the rates be from <i>full replacement value</i> .	The final Compensation based on the market value as required under the National law. It included disturbance allowance, transport allowance, loss of profit allowance. Only one PAP got loss of profit allowance has he owned a registered business of a guest house. About eight businesspeople (small garage, small shops, and restaurant) did not qualify to get loss of profit allowance because their business was not registered.
D	Did the Valuation Report include all the relevant allowances required under law (i.e., disruption allowance, rental allowance etc.)? If yes, do you feel that the allowances were fair and correct?	Yes. The Valuer feel that it was fair and correct as it was according to the National law, regulations, and guidelines.
E	It is understood that the Valuation Reports were prepared in 2018, and the compensation was paid in XXXXX. Is there any legislation or standard for the validity of the valuation reports, and where there are cases of delays, is there any additional compensation that must be provided to PAPs?	Payment report was submitted in February 2020. Actual payment to PAPs was affected in November 2021. PAPs qualify for an interest/ additional compensation. Additional Compensation for PAPs was approved in January 2023 and was submitted to The Ministry of Works, then to the Ministry of Finance which will disburse funds to TANROADS for payment to PAPs.

No.	Interview Question	Response
F	Has your office been approached by a PAP to lodge a grievance on the compensation rates, or has your office heard of any such issues in the past? If yes, please provide a summary of the grievances.	Yes, many PAPs lodged their grievances (with reference to form no. 3 and 4) at the Ward and District grievance committee. The district committee was led by the District Commissioner, TANROADS Regional Manager (secretary) and members included Land Officer, Legal Officer, Ward Councillor, District Administrative Secretary, District Security Officer and three elders. The District committee determined the grievances and only four grievances were found genuine cases and they are already paid.
D	Other than reviewing and authorising the valuation reports, did your office provide any additional support to TANROADS in implementing the RAP? If yes, please provide a short summary of the type of support that was provided.	The Valuer has no idea about RAP.
5	<b>Ward Councillor &amp; Village Leadership / Village Council</b>	
A	Did the ward/village councillor provide any kind of support to TANROADS during the development and implementation of the RAP? If yes, please provide a summary of the type of support that was provided.	They identified the PAPs and gathered them for a public awareness meeting. Supported PAPs through valuation and compensation exercises. Reinforced the PAPs about the importance of using the funds appropriately - financial literacy. During the preparation of the project, they prepared meeting about the indigenous people that were being displaced - confirmed that they did not have indigenous people in the area and the RAP could continue as planned.
B	Did the ward/village councillor spend time with the PAPs in terms of getting their compensation, addressing any problems, or supporting the Project during stakeholder engagement? If yes, please provide a summary of the type of support that was provided to PAPs.	See above

No.	Interview Question	Response
C	Does the ward/village councillor feel that the PAPs have received fair compensation and they are largely happy, or has there been any unhappiness about the compensation? If no, what have PAPs been unhappy about?	<p>There was a theme that, regardless of whatever was allocated , everyone usually wanted more, despite the fact that is the majority of cases people built better housing.</p> <p>Everyone who was compensated has demolished and completed building of their new dwelling.</p> <p>PAPs got a good deal, because in addition to being compensated they also have the opportunity to salvage assets from their previous property.</p> <p>During conversations, the majority of PAPs were content prior to construction. However, now the money has been spent and construction finished there is discontent amongst the community.</p> <p>After conversations, people submitted grievances, however no additional grievance compensation has been paid. The PAPs feel the grievance process favoured TANROADS.</p>
D	In cases where PAPs have been given cash for their land and structures, has the ward councillor seen them using the money to buy replacement land and rebuild new structures, or do they feel money has gone elsewhere? If the latter, where do you think the PAPs are spending their money?	N/A - all houses have been completed, and this is covered in the Impact Survey.
E	Has the ward/village councillor seen any PAPs that have struggled to find replacement property, or rebuild their homes? If yes, please provide a summary of what they saw and what they think the problems were.	No
F	Does the ward/village councillor know of any situation where PAPs have still not been paid their compensation, or they have been incorrectly paid compensation and have lodged a grievance? If yes, please provide more details.	Ongoing grievance around reduction in compensation due to economic recession.
G	Did TANROADS provide sufficient and understandable engagement with your community before the land acquisition process started? Please describe what type of engagement they had with the Project. If the engagement was poor, please describe what can be done to make it better.	The consensus was that TANROADS provide good engagement with the affected community prior to the acquisition. Communities were engaged at every step of the way and had the opportunity to be involved and questions the project.
H	Is the Ward/village Councillor aware of the Project grievance mechanism or are they aware of how a PAP can make a complaint if there is a problem with the Project or the compensation process.	As detailed above. Any PAP was able to raise of complaint by submitting it in writing to the Ward office. However, as detailed in these minutes we have established that this process was executed poorly and inconsistent.

No.	Interview Question	Response
I	Was there any situation where people were required to move off their property or give portions of their land to the Project before they were paid compensation?	No
J	Was there any situation where people were evicted without been provide fair compensation? If yes, please provide a summary of what happened.	There were a series of graves that needed to be reburied and were done so in the correct manner. Village leaders were involved in the valuation of this process.
K	Is the Ward/village Councillor aware of any problems with vulnerable households or gender abuse that might have been a result of the resettlement process? If yes, please provide more detail on the problems that you are aware of.	No. There were initially concerns about male heads of household receiving the funds, but this was resolved with joint bank accounts.
L	Is the Ward/village Councillor aware of any community development / livelihood restoration programmes established by TANROADS to allow PAPs to improve their livelihoods? If yes, please provide a summary of the development activities put in place by TANROADS.	No - Councillors were not aware of any livelihood programmes.
M	If the Ward/village Councillor is aware of any community development / livelihood restoration programmes, do they consider the programme to be successful in supporting local PAPs? Please provide detail on why you said yes/no.	N/A
7	<b>Focus Group Discussion – PAP Women / Female-Headed Households</b>	
A	Out of all the women attending this meeting, how many of their families have been 100% compensated?	Out of all the women present at the meeting, all of them (bar one) have been paid their initial compensation fee in full.
B	Out of all the women attending this meeting, how many of their families have been only partially compensated? <i>If a person says they have not been given 100% compensation, please ask for consent to take their details (name and number) so we can investigate or ask for details on why they still have compensation outstanding.</i>	One PAP expressed that she was meant to be paid for a 6-room house but was only paid for 5. The valuer admitted there had been a mistake and that she could lodge a complaint after the initial payment. However, when she approached the Ward Grievance Committee to raise the complaint, she was told they the procedure was closed. She still does not know why she has not been paid or what do! Here details are as follows: Zubeda Migire Sulle 0782 131 844

No.	Interview Question	Response
C	Out of all the women attending this meeting, how many of their families have not been compensated at all? <i>If a person says they have not been given 100% compensation, please ask for consent to take their details (name and number) so we can investigate or ask for details on why they still have compensation outstanding.</i>	N/A
D	Do the women know of any situations where, they personally or their neighbours have the following problems: 1. Compensation is outstanding because the owner sold the land, died etc. 2. Any ongoing disputes in terms of property ownership or owner details since. 3. Any grievances where there are still outstanding compensation payments. 4. Any grievances where compensation payments are considered incorrect. Any situations where people had to pay a tax, penalties, or fees.	This has been a recurring theme through the interview process.  The valuation shown to PAPs on the computer at the Ward office in most cases is different to the payment amount. When TANROADS delivered cheques they said that the initial amount shown by the valuer was incorrect but were unable to give detail as to why the figure was different. Numerous PAPs did not file grievances because they were told that the payment was final and not for further discussion. There were also instances where single female heads of households did not launch grievances because they did not feel empowered to do so due to lack of awareness of the process.
E	Do the women attending this meeting feel that there was sufficient engagement, and they received enough information on the compensation process?	The engagement and explanation of the process was comprehensive, but when it came to execution, it was different to how it was initially explained. PAPs were shown one compensation figure and paid a smaller one with no explanation. Initially PAPs felt very positive about the project, but when the information started changing, people lost trust in the process and the general consensus was that the grievance process was a waste of time.
F	Do the women attending this meeting know of the grievance mechanism, and do they know how to lodge a complaint/grievance? If yes, please describe how they would lodge a grievance.	The process was explained and that they needed to lodge complaints to the Ward office in writing. However, when some of them tried to do so, they were told that the payment was final, and process was closed.



No.	Interview Question	Response
G	Did any person at this meeting lodge a grievance or complaint during the resettlement process? <i>If yes, please ask them to provide a summary of the complaint and whether it was resolved.</i>	<p>3 PAPs in the session lodges grievances, and all 3 were regarding the valuation of their assets.</p> <p>In one instance, the valuation that was completed was extremely low, and she complained she was told there is no point in lodging a complaint because the valuer knew better. She was told she must sign now, and she could lodge a complaint after. She lodged a grievance with no response after 3 months, and when the TANROADS Sociologist visited he advised her to lodge the complaint again. She lodges the complaint a second time and was informed that she was not entitled to anything because she had already signed off the initial valuation.</p>
H	Out of all the women attending this meeting how many took cash compensation, and how many chose to get replacement land and structures from the Government? (Do a hand count for each)	100% took cash
I	Out of all the women who selected cash compensation, has the compensation been sufficient to get new land and to rebuild their structures? If no, please explain why it has not been sufficient.	Sufficient
J	Out of all the women who selected cash compensation, did any of them struggle to get new land or rebuild their homes? If yes, what were the problems they encountered.	Yes, because of awareness of the upcoming project and demand for land there was drastic spike in the price of land in the surrounding area, which was replicated in the cost of hardware and materials.
K	Out of all the women who selected replacement land/structures, who provided the new land/structures (TANROADS, District Officials, Villager Leadership) and was this done before they had to give up their land/homes?	N/A
L	Out of all the women who selected replacement land/structures, do they consider the replacement land/structures to be better than what they lost. If no, please explain why you don't consider it to be better.	N/A
M	Are the women aware of any situation where people were required to move off their property or give portions of their land to the Project before they were paid compensation?	No
N	Are the women aware of any situation where people were evicted without been provide fair compensation? If yes, please provide a summary of what happened.	No

No.	Interview Question	Response
O	Are the women aware of any community development / livelihood restoration programmes established by TANROADS to allow PAPs to improve their livelihoods? If yes, please provide a summary of the development activities put in place by TANROADS.	<b>Unaware of any programmes offered by TANROADS</b>  Note: PAPs expressed that 3 months was not sufficient time to find land, demolish their homes and rebuild on a new site.
P	Out of the women at this meeting, how many are part of a community development / livelihood restoration programs? (Do a hand count)? Of those that said yes, do they consider the programme to be successful in supporting local people? Please provide detail on why you said yes/no.	N/A
Q	Do the women at this meeting seen or know of any situation where female-headed households were affected? Was there any problem with these households' receiving compensation, or was there problems with husbands/family members? If yes, please provide a summary of what happened.	It was very difficult for female heads of household to source land and demolish their houses and in almost all cases had to pay people to do it on their behalf.
R	Do women feel like they have been respected and included in the resettlement process? Please provide detail on how they have / have not been included.	<b>Concerns were raised that female heads of households were discriminated against and taken advantage of. Properties of similar standing were compensated less in case with a female head of household was present.</b>
<b>10</b>	<b>Focus Group Discussion – Kilima Moja – PAP Men</b>	
A	Out of all the men attending this meeting, how many of their families have been 100% compensated?	The men representatives feel as though nobody was paid in full because they were initially shown an amount on a computer screen and then later when asked to sign the amounts were reduced. Two specific examples were provided: one man's compensation dropped from TZS 164 million to TZS 140 million, and another dropped from TZS 139 million to TZS 106 million. When the PAPs asked why this had happened, they said they were told due to COVID-19 market conditions. They continued to question and were later told that taxes were applied, but then they got a legal opinion and said this was not legal. Finally, they were told that depreciation was applied to structures, hence the reduction. The initial disclosure of compensation amounts done on a computer screen was reported to take place on 11 September 2020, and then the signing where amounts were reduced happened from 20 September 2020. Review of valuation reports do not show any deductions due to COVID-19, or any taxes applied. Depreciation was, however, applied.

No.	Interview Question	Response
B	Out of all the men attending this meeting, how many of their families have been only partially compensated? <i>If a person says they have not been given 100% compensation, please ask for consent to take their details (name and number) so we can investigate or ask for details on why they still have compensation outstanding.</i>	All were paid what they signed for but complained that it was reduced from what they had initially been shown on the computer screen. Some wanted to refuse to sign but said TANROADS told them to sign and lodge a grievance later. After the payment was made, TANROADS did not show up to grievance hearings and grievances were not resolved.
C	Out of all the men attending this meeting, how many of their families have not been compensated at all? <i>If a person says they have not been given 100% compensation, please ask for consent to take their details (name and number) so we can investigate or ask for details on why they still have compensation outstanding.</i>	None, all paid according to what they signed for.
D	Do the men know of any situations where, they personally or their neighbours have the following problems: 5. Compensation is outstanding because the owner sold the land, died etc. 6. Any ongoing disputes in terms of property ownership or owner details since. 7. Any grievances where there are still outstanding compensation payments. 8. Any grievances where compensation payments are considered incorrect. 9. Any situations where people had to pay a tax, penalties, or fees.	5. None. 6. None. 7. The male PAPs present were aware of one case where part of the land was not valued, the PAP lodged a grievance, and it has not been resolved. The male PAPs present were aware of a case where a PAPs land and assets had not been valued. He wrote to TANROADS and has not yet received a response. 8. Yes, all of them dispute their amounts as explained above, due to seeing an earlier higher amount. 9. No, although they claim they were told that the amounts had been reduced by tax but confirmed this was not legally possible. Review of valuation reports and compensation vouchers do not show any tax deductions.

E	<p>Do the men attending this meeting feel that there was sufficient engagement, and they received enough information on the compensation process?</p>	<p>The male PAP representatives felt that the engagement in the beginning was good, and the process was well explained. However, they were not satisfied when no clear and consistent explanation could be given for reduction in compensation from their initial disclosure of compensation amounts to when they were asked to sign for the compensation. There have been no updates on the interest payment, and TANROADS staff have stopped answering their phones when PAPs try call for follow up.</p> <p>The PAPS complained about an engagement by the World Bank and claimed that TANROADS had taken three unaffected parties to a World Bank consultation to give their views about the airport extension resettlement process. The names of these individuals were provided. The PAPs reported to have met and</p>
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No.	Interview Question	Response
		<p>interrogated the three individuals who were unable to explain themselves properly.</p> <p>PAPs reported to have seen the TANROADS budget for the compensation process at TZS 5.9 billion, and later seen that the total paid was only TZS 3 billion.</p> <p>Accusations of corruption were made by the PAPs, and they claim to have reported this to the District Corruption Bureau and not received a response. Note: the audit team did not pursue this allegation as this was beyond the scope of the audit.</p>
F	Do the men attending this meeting know of the grievance mechanism, and do they know how to lodge a complaint/grievance? If yes, please describe how they would lodge a grievance.	Yes, they know of the grievance committee, but they are frustrated because grievances are never investigated and resolved, and they don't receive feedback.
G	Did any person at this meeting lodge a grievance or complaint during the resettlement process? <i>If yes, please ask them to provide a summary of the complaint and whether it was resolved.</i>	Yes, many of us and we did not receive feedback. Our complaints included complaints about our compensation being reduced, complaints about assets not included in our valuations, and complaints about delays in compensation and not being paid interest.
H	Out of all the men attending this meeting how many took cash compensation, and how many chose to get replacement land and structures from the Government? (Do a hand count for each)	All took cash as in-kind was not offered.
I	Out of all the men who selected cash compensation, has the compensation been sufficient to get new land and to rebuild their structures? If no, please explain why it has not been sufficient.	The compensation has not been enough to rebuild our structures because the valuation was done in 2018 and we were paid in December 2021. The original cut-off was declared in 2014 and we were told not to build any more assets from that time. Roof sheeting, for example, increased from TZS 12000 per sheet in 2018 to TZS 32000 per sheet in 2021.
J	Out of all the men who selected cash compensation, did any of them struggle to get new land or rebuild their homes? If yes, what were the problems they encountered.	Yes, we struggled because of increase in prices that happened from the valuation to the time of compensation, and because our compensation amounts were reduced during the process.
K	Out of all the men who selected replacement land/structures, who provided the new land/structures (TANROADS, District Officials, Villager Leadership) and was this done before they had to give up their land/homes?	Not applicable.

No.	Interview Question	Response
L	Out of all the men who selected replacement land/structures, do they consider the replacement land/structures to be better than what they lost. If no, please explain why you don't consider it to be better.	Not applicable.
M	Are the men aware of any situation where people were required to move off their property or give portions of their land to the Project before they were paid compensation?	Yes, Anton Dawi was not present during the time of the survey. He wrote a letter to request valuation and has not received a response.
N	Are the men aware of any situation where people were evicted without been provide fair compensation? If yes, please provide a summary of what happened.	Yes, the case above. Also, we all feel we were not given fair compensation due to the time that passed between valuation and payment, and since our valuations were reduced during the process.
O	Are the men aware of any community development / livelihood restoration programmes established by TANROADS to allow PAPs to improve their livelihoods? If yes, please provide a summary of the development activities put in place by TANROADS.	No.
P	Out of the men at this meeting, how many are part of a community development / livelihood restoration programs? (Do a hand count)? Of those that said yes, do they consider the programme to be successful in supporting local people? Please provide detail on why you said yes/no.	Not applicable.

## 5.4. Appendix D – Survey Questionnaire

IMPACT / PERCEPTION SURVEY						
ID		PAP Name				
No	Question	Yes	No	Do Not Know	No Comment	Comments
1	<b>Did the household lose any of the following?</b>					
	• Residential Land					
	• Farmland					
	• Homes and Buildings					
	• Ancillary structures (boundary walls, etc)					
	• Business Structures					
	• Crops					
	• Trees					
	• Graves					
	• Other (Specify ..... )					
2	<b>Did the household ever receive a compensation agreement?</b>					
3	<b>Did the compensation payment match the agreement?</b>					
4	<b>Did the household ever lodge a complaint about a missing or incorrect payment?</b>					
5	<b>Did the household receive their compensation payment BEFORE they were required to move or hand-over their land to TANROADS.</b>					If no, please provide more detail:
6	<b>Has your household already been paid?</b>					
	• All Your Compensation					
	• Only Part of Your Compensation					
	• None of the Compensation					
7	<b>Did your household select cash compensation for your loss of:</b>					
	• Residential Land					
	• Farmland					
	• Homes and Buildings					
	• Ancillary structures (boundary walls, etc)					
	• Business Structures					
	• Crops					
	• Trees					
	• Graves					
	• Other (Specify ..... )					
8	<b>Was the Cash compensation Spent On / What will the cash compensation be spent on?</b>					
	• Buying Replacement Residential Land					
	• Buying Replacement Farmland					
	• Building Replacement Homes					
	• Building New Ancillary Structures					
	• Establishing a New Business					
	• Buying Food/Crops/Drinks at the Markets					
	• Buying Home Durable Goods					
	• Paying for Education/Health/Services					
	• Grave Ceremony					
	• Other (Specify ..... )					
9	<b>If the households have already replaced their lost assets with their cash, do they believe that there is an improvement in their:</b>					

IMPACT / PERCEPTION SURVEY						
ID		PAP Name				
No	Question	Yes	No	Do Not Know	No Comment	Comments
	<ul style="list-style-type: none"> <li>• Replacement Residential Land</li> <li>• Replacement Farmland</li> <li>• Replacement Homes</li> <li>• New Ancillary Structures</li> <li>• New Business</li> <li>• Other (Specify ..... )</li> </ul>					
10.	<b>If no, please provide an explanation of why the replacement assets are not as good as the assets you had before resettlement?</b>					
11.	<b>Did your household Receive Replacement Assets from TANROADS for your loss of:</b>					
	• Residential Land / farmland					
	• Farmland					
	• Homes and Buildings					
	• Ancillary structures (boundary walls, etc)					
	• Business Structures					
	• Other (Specify ..... )					
12.	<b>Does your household believe that they received better replacement assets, covering:</b>					
	• Residential Land					
	• Farmland					
	• Homes and Buildings					
	• Ancillary structures (boundary walls, etc)					
	• Business Structures					
	• Other (Specify ..... )					
13.	<b>If no, please provide an explanation of why the replacement assets are not as good as the assets you had before resettlement?</b>					
14.	<b>Is/Was Your Household Part of Any Development / Livelihoods Programme including the following:</b>					
	Cooperatives and Micro-Credit Schemes					
	Technical and Vocational Skill Training					
	Project Related Employment					
	Other (Specify ..... )					
15.	<b>Does your household feel that your livelihoods have been restored after resettlement, including:</b>					
	Annual Crop Farming					If no, please explain why:
	Perennial and Tree Crop Farming					If no, please explain why:
	Livestock Rearing					If no, please explain why:
	Formal Business					If no, please explain why:
	Informal / Petty Trade					If no, please explain why:
	Formal Employment / Tourism					If no, please explain why:
	Other (Specify ..... )					If no, please explain why:
16.	<b>Does the household feel that there was sufficient engagement, and they received enough information on the compensation process?</b>					



IMPACT / PERCEPTION SURVEY						
ID		PAP Name				
No	Question	Yes	No	Do Not Know	No Comment	Comments
17.	Is the household aware of the Project complaints system / grievance mechanism?					
18.	Did the household ever lodge a complaint / grievance with TANROADS or local authorities.					If yes, please provide more detail on the complaint:
19.	Do you have any other comments that the project should be aware of?					

## 5.5. Appendix E – Record of Meetings



## TRANSPORT INTEGRATION PROJECT (TANTIP)

CONSULTANCY SERVICES FOR RESETTLEMENT CLOSURE AUDITS COVERING THE  
IRINGA AND LAKE MANYARA REGIONAL AIRPORT PROJECTS.

List of stakeholders consulted.

Meeting at ~~TANROADS~~  
ARUSHA

1	CHRISTOPH MWAUSAHA	HEARTHSTONE	Tel: 0754 386 744	CT
2	EDWARD WILSON	HEARTHSTONE	Tel: +27 722 78 9975	FW
3	Eng Bright Kiagi	TANROADS-AR	Tel: 07429 09056	R
4	KAMBIBI KAMUGUSTO	HEARTHSTONE	Tel: 0755 951133	UR
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			Tel:	
			Tel:	
			Tel:	



## TANZANIA TRANSPORT INTEGRATION PROJECT (TANTIP)



CONSULTANCY SERVICES FOR RESETTLEMENT CLOSURE AUDITS COVERING THE IRINGA AND LAKE MANYARA REGIONAL AIRPORT PROJECTS.

## List of stakeholders consulted.

Date	Name	Department/Organisation	Position	Telephone/Email	Signature
22/05/2023	Eng. Christopher Saul	TANROADS - AR	AGM	Tel: 0783 158944 Email: christopher.saul@tanroads.go.tz	
11	Eng Bright Kigugi	TANROADS - AR	IDPU	Tel: 0742909056 Email: bright.kigugi@tanroads.go.tz	
11	TP. Shadrach Chuma	MLHSD - ARUMIA	RTPD	Tel: 0754 803627 Email: shadrach.chuma@land.go.tz	
11	Kednos S. Nj. Tanga	Valuer MLHSD - ARUMIA	Valuer	Tel: 0754 557071 Email: kednosnj@comet.com	
23/05/2023	EUSEBI S. MWORIA	TANROADS - ARUMIA	INCHARGE OF ACCOUNTS & ADMINISTRATION	Tel: 0753 804830 Email: eusebi.mworia@tanroads.go.tz	
25/05/2023	JACQUELINE P. DUBOZUA	ADMINISTRATIVE OFFICERS DC - OFFICE	AD - DC OFFICE	Tel: 0756056544 Email: jacqueline@didou.com	



## TRANSPORT INTEGRATION PROJECT (TANTIP)

CONSULTANCY SERVICES FOR RESETTLEMENT CLOSURE AUDITS COVERING THE  
IRINGA AND LAKE MANYARA REGIONAL AIRPORT PROJECTS.

## List of stakeholders consulted.

SN	Name	Position	Telephone	Signature
	JOSEPHINE JOHA	MJUMBE	Tel: 0784263068	
	REHEMA AGUSTINO	MJUMBE	Tel: 0759497660	
	Magneth Miumbe		Tel: 0769010817	
	PROSCA I SINGANO		Tel: 0757766829	
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	NEEMA THOMAS		Tel: 0768861501	
	ROSEMARY MUMBO	Mjumbo	Tel: 075393089	
	ZUBEDA MUMBE	Mjumbo	Tel: 078218144	
	THRESIA MJUMBE	MJUMBE	Tel: 075371328	
	Salome Emanuel Emanuel Ringo	Mjumba	Tel: 076215705	
	HUMPHREY CHRISTINA	MJUMBE	Tel: 076217426	
			Tel:	



## TRANSPORT INTEGRATION PROJECT (TANTIP)

CONSULTANCY SERVICES FOR RESETTLEMENT CLOSURE AUDITS COVERING THE  
IRINGA AND LAKE MANYARA REGIONAL AIRPORT PROJECTS.

## List of stakeholders consulted.

SN	Name	Position	Telephone	Signature
1.	REHINDER AKEMBE	MUATHIRI WA	Tel: 0769 231608	
2.	NKOTI A. MBISE	— 11 —	Tel: 0754 824456	
3.	MICHAEL D. BANYO	— 11 —	Tel: 0767 240202	
4.	SAFARI SURUMU	— 11 —	Tel: 0768 551012	
5.	JOHN BASKI	— 11 —	Tel: 0742 505597	
6.	GODSON JOMU	— 11 —	Tel: 0754 611986	
7.	ISAAC Y. JOTAI	— 11 —	Tel: 0743-950093	
8.	JOTAI THOMAS	— 11 —	Tel: 0759 288952	
9.	SALIMU	— 11 —	Tel: 0762 617193	
10.	GUWAMDEMIA	— 11 —	Tel: 0763 648028	
11.	JOSEPH TI	— 11 —	Tel: 0752 225592	
12.	BRISNY KUSANY	MUATHIRI WA	Tel: 0754-537132	
13.	PETRO GUMBI	— 11 —	Tel: 0759 793108	

14. EMANUEL S. KANUYA 0769 968594 -
15. JOSEPH N. MABANGU 0746086444
16. PETRO HAYSHI 0754 942306
17. YONA SIDRI 0757 937333



## TRANSPORT INTEGRATION PROJECT (TANTIP)

CONSULTANCY SERVICES FOR RESETTLEMENT CLOSURE AUDITS COVERING THE  
IRINGA AND LAKE MANYARA REGIONAL AIRPORT PROJECTS.

WARD & VILLAGE DEV. COMMITTEE

List of stakeholders consulted.

24/5/2025

SN	Name	Position	Telephone	Signature
1.	MARSEKI M-LORRI	DIWANI MIKITI WDC	Tel: 0755271553	
2.	SIKOTIRARA	WEO (KATIBI) WDC	Tel: 0754619615	
3.	REHEMA AGUSTINO	DIWANI V. MAALUMU	Tel: 015949766	
4.	ISRAEL DAVID	MJUMBE	Tel: 0754845295	
5.	SAMUEL PAULO	MJUMBE	Tel: 0763210580 <del>07645</del>	
6.	JOSEPHINE	MJUMBE	Tel: 0784263065	
07.	Bright Kiongi	TANROADS-AR	Tel: 0742909056	
08.	Tito S. Tanga	M/Kiti Kibogoj	Tel: 0756235073	
9.	HERMAN SULE	MJUMBE	Tel: 0754743032	
10.	CHRISTOPHER MANSANGA	HEARTHSTONE CONSULTANT	Tel: 0754386744	
11.	GARTH WATKINSON	HEARTHSTONE	Tel: +27833773424	
12.	KAMBIBI KAMUKOTA	HEARTHSTONE	Tel: 0755-951133	
			Tel:	



TRANSPORT INTEGRATION PROJECT (TANTIP)

CONSULTANCY SERVICES FOR RESETTLEMENT CLOSURE AUDITS COVERING THE  
IRINGA AND LAKE MANYARA REGIONAL AIRPORT PROJECTS.

GRIEVANCE COMMITTEE

KILIMANJARO 24/5/23

List of stakeholders consulted.

SN	Name	Position	Telephone	Signature
1.	ISRAEL A. LULU	MIKITI - KANI	Tel: 0754845295	
2.	SAMUEL PAULO	VED	Tel: 0768210560	
3.	MARSELI LORY	MHE. JIWANI	Tel: 0755271553	
4.	REHEMA AGUSIND	MHE. JIWANI V. MAMUJA	Tel: 0759497660	
5.	SABOKI MBISE	MGUMBE	Tel: 0754611986	
6.	HERMANI SULE	MGUMBE	Tel: 0754742022	
7.	JOSEPHINA JOHN	MGUMBE	Tel: 0784263065	
8.	SALI WAKHO	MGUMBE	Tel: 0764627050	
9.	ANTON KIRWAY	MGUMBE	Tel: 0754-537132	
10.	SILU ATANGA	WED - MIKITI MGUMBE	Tel: 0754619615	
11.	JUMANDE MAFIA	AELSA TARAFI MGUMBE	Tel: A 0769110081	
12.	TITO BIRANGA	MGUMBE	Tel: 0756235073	
			Tel:	

## 5.6. Appendix F – Summary of Payments

Consolidated PAP List						
No.	Val. Number	Valuation Report Total	Payment Voucher No.	Payment Voucher Total	Interest Payment	Notes
1	VAL/KRT/KLJ/MARP/001	36,593,593.40	PV-00009748	36,593,593.40	3,146,521.27	Payment Voucher matches Valuation
2	VAL/KRT/KLJ/MARP/2	60,319,696.18	PV-00009749	60,319,696.18	5,186,623.93	Payment Voucher matches Valuation
3	VAL/KRT/KLJ/MARP/5	25,589,483.40	PV-00009750	25,589,483.40	2,200,326.52	Payment Voucher matches Valuation
4	VAL/KRT/KLJ/MARP/7	82,308,074	PV-00009751	82,308,074	7,077,307.30	Payment Voucher matches Valuation
5	VAL/KRT/KLJ/MARP/9	39,741,286.80	PV-00009752	39,741,286.80	3,417,177.51	Payment Voucher matches Valuation
6	VAL/KRT/KLJ/MARP/10	17,923,306.30	PV-00009753	17,923,306.30	1,541,145.85	Payment Voucher matches Valuation
7	VAL/KRT/KLJ/MARP/13	38,166,600	PV-00009754	38,166,600	3,281,777.15	Payment Voucher matches Valuation
8	VAL/KRT/KLJ/MARP/15	8,134,803.40	PV-00009755	8,134,803.40	699,475.77	Payment Voucher matches Valuation
9	VAL/KRT/KLJ/MARP/16	10,731,158.40	PV-00009756	10,731,158.40	922,724.86	Payment Voucher matches Valuation
10	VAL/KRT/KLJ/MARP/19	106,179,926.31	PV-00009757	106,179,926.31	9,129,942.31	Payment Voucher matches Valuation
11	VAL/KRT/KLJ/MARP/20	6,225,944.80	PV-00009758	6,225,944.80	535,341.46	Payment Voucher matches Valuation
12	VAL/KRT/KLJ/MARP/21	4,743,823.60	PV-00009759	4,743,823.60	407,900.41	Payment Voucher matches Valuation



Consolidated PAP List						
No.	Val. Number	Valuation Report Total	Payment Voucher No.	Payment Voucher Total	Interest Payment	Notes
13	VAL/KRT/KLJ/MARP/22	5,225,088.20	PV-00009760	5,225,088.20	449,282.23	Payment Voucher matches Valuation
14	VAL/KRT/KLJ/MARP/23	20,972,672.50	PV-00009761	20,972,672.50	1,803,343.49	Payment Voucher matches Valuation
15	VAL/KRT/KLJ/MARP/25	12,414,050	PV-00009762	12,414,050	1,067,429.26	Payment Voucher matches Valuation
16	VAL/KRT/KLJ/MARP/26	13,294,582.60	PV-00009763	13,294,582.60	1,143,142.37	Payment Voucher matches Valuation
17	VAL/KRT/KLJ/MARP/27	23,303,598	PV-00009764	23,303,598	2,003,773.34	Payment Voucher matches Valuation
18	VAL/KRT/KLJ/MARP/29	5,281,027.80	PV-00009766	5,281,027.80	454,092.23	Payment Voucher matches Valuation
19	VAL/KRT/KLJ/MARP/30	16,728,037.80	PV-00009767	16,728,037.80	1,438,370	Payment Voucher matches Valuation
20	VAL/KRT/KLJ/MARP/31	3,362,464.30	PV-00009768	3,362,464.30	289,123.44	Payment Voucher matches Valuation
21	VAL/KRT/KLJ/MARP/33	29,022,458	PV-00009769	29,022,458	2,495,512.82	Payment Voucher matches Valuation
22	VAL/KRT/KLJ/MARP/34	47,643,338.70	PV-00009770	47,643,338.70	4,096,640.01	Payment Voucher matches Valuation
23	VAL/KRT/KLJ/MARP/35	17,946,588.10	PV-00009771	17,946,588.10	1,543,147.75	Payment Voucher matches Valuation
24	VAL/KRT/KLJ/MARP/36 T	9,074,819.80	PV-00009772	9,074,819.80	780,303.62	Payment Voucher matches Valuation
25	VAL/KRT/KLJ/MARP/37	48,327,063.40	PV-00009773	48,327,063.40	4,155,430.47	Payment Voucher matches Valuation
26	VAL/KRT/KLJ/MARP/38	54,006,948.90	PV-00009774	54,006,948.90	4,643,818.71	Payment Voucher matches Valuation
27	VAL/KRT/KLJ/MARP/39	11,730,618.32	PV-00009775	11,730,618.32	1,008,663.99	Payment Voucher matches Valuation

Consolidated PAP List						
No.	Val. Number	Valuation Report Total	Payment Voucher No.	Payment Voucher Total	Interest Payment	Notes
28	VAL/KRT/KLJ/MARP/40	38,284,300	PV-00009776	38,284,300	3,291,897	Payment Voucher matches Valuation
29	VAL/KRT/KLJ/MARP/46	4,638,230.65	PV-00009777	4,638,230.65	398,820.94	Payment Voucher matches Valuation
30	VAL/KRT/KLJ/MARP/54	7,188,602.40	PV-00009778	7,188,602.40	618,116.13	Payment Voucher matches Valuation
31	VAL/KRT/KLJ/MARP/55	34,943,955.40	PV-00009779	34,943,955.40	3,004,679.63	Payment Voucher matches Valuation
32	VAL/KRT/KLJ/MARP/56	23,215,812.35	PV-00009780	23,215,812.35	1,996,225	Payment Voucher matches Valuation
33	VAL/KRT/KLJ/MARP/58	194,256,676.80	PV-00009781	194,256,676.80	16,703,272.59	Payment Voucher matches Valuation
34	VAL/KRT/KLJ/MARP/59	19,741,486.41	PV-00009782	19,741,486.41	1,697,483.12	Payment Voucher matches Valuation
35	VAL/KRT/KLJ/MARP/62	20,843,451.00	PV-00009783	20,843,451.00	1,792,236.18	Payment Voucher matches Valuation
36	VAL/KRT/KLJ/MARP/63	48,454,066	PV-00009784	48,454,066	4,166,351	Payment Voucher matches Valuation
37	VAL/KRT/KLJ/MARP/65	92,426,583.30	PV-00009785	92,426,583.30	7,947,353.17	Payment Voucher matches Valuation
38	VAL/KRT/KLJ/MARP/66	10,170,175.20	PV-00009786	10,170,175.20	874,488.39	Payment Voucher matches Valuation
39	VAL/KRT/KLJ/MARP/67	60,725,920.80	PV-00009787	60,725,920.80	5,221,553.39	Payment Voucher matches Valuation
40	VAL/KRT/KLJ/MARP/68	18,303,152.93	PV-00009788	18,303,152.93	1,573,807.18	Payment Voucher matches Valuation
41	VAL/KRT/KLJ/MARP/69	4,401,124	PV-00009789	4,401,124	378,433.19	Payment Voucher matches Valuation
42	VAL/KRT/KLJ/MARP/70	53,185,613.68	PV-00009790	53,185,613.68	4,573,195.72	Payment Voucher matches Valuation

Consolidated PAP List						
No.	Val. Number	Valuation Report Total	Payment Voucher No.	Payment Voucher Total	Interest Payment	Notes
43	VAL/KRT/KLJ/MARP/71	17,185,973.80	PV-00009791	17,185,973.80	1,477,745.89	Payment Voucher matches Valuation
44	VAL/KRT/KLJ/MARP/79	104,267,198.60	PV-00009792	104,267,198.60	8,965,475.31	Payment Voucher matches Valuation
45	VAL/KRT/KLJ/MARP/80	13,985,950.80	PV-00009793	13,985,950.80	1,202,590.06	Payment Voucher matches Valuation
46	VAL/KRT/KLJ/MARP/82	79,316,573.88	PV-00009794	79,316,573.88	6,820,081.43	Payment Voucher matches Valuation
47	VAL/KRT/KLJ/MARP/83	15,148,097	PV-00009795	15,148,097	1,302,517.87	Payment Voucher matches Valuation
48	VAL/KRT/KLJ/MARP/85	9,257,383.20	PV-00009796	9,257,383.20	796,001.44	Payment Voucher matches Valuation
49	VAL/KRT/KLJ/MARP/87	44,666,953.80	PV-00009797	44,666,953.80	3,840,713.83	Payment Voucher matches Valuation
50	VAL/KRT/KLJ/MARP/88	7,939,729.20	PV-00009798	7,939,729.20	682,702	Payment Voucher matches Valuation
51	VAL/KRT/KLJ/MARP/90	4,520,857	PV-00009799	4,520,857	388,728.50	Payment Voucher matches Valuation
52	VAL/KRT/KLJ/MARP/91	232,148,616.66	PV-00009800	232,148,616.66	19,961,432.93	Payment Voucher matches Valuation
53	VAL/KRT/KLJ/MARP/92	5,162,352.70	PV-00009801	5,162,352.70	443,887.88	Payment Voucher matches Valuation
54	VAL/KRT/KLJ/MARP/93	4,038,426.44	PV-00009802	46,966,323.20	4,038,426.44	Payment Voucher matches Valuation
55	VAL/KRT/KLJ/MARP/95	33,234,298.70	PV-00009803	33,234,298.70	2,857,670.28	Payment Voucher matches Valuation
56	VAL/KRT/KLJ/MARP/100	5,918,020.20	PV-00009804	5,918,020.20	508,864.39	Payment Voucher matches Valuation
57	VAL/KRT/KLJ/MARP/101	29,150,184.45	PV-00009805	29,150,184.45	2,506,495.45	Payment Voucher matches Valuation

Consolidated PAP List						
No.	Val. Number	Valuation Report Total	Payment Voucher No.	Payment Voucher Total	Interest Payment	Notes
58	VAL/KRT/KLJ/MARP/10 2	5,151,322.40	PV-00009806	5,151,322.40	442,939.43	Payment Voucher matches Valuation
59	VAL/KRT/KLJ/MARP/10 3	20,914,095.40	PV-00009809	20,914,095.40	1,798,310.58	Payment Voucher matches Valuation
60	VAL/KRT/KLJ/MARP/10 4	46,643,129.35	PV-00009810	46,643,129.35	4,010,636.43	Payment Voucher matches Valuation
61	VAL/KRT/KLJ/MARP/10 6	29,026,966.80	PV-00009811	29,026,966.80	2,495,900.51	Payment Voucher matches Valuation
62	VAL/KRT/KLJ/MARP/10 8	4,351,347.60	PV-00009812	4,351,347.60	374,153.14	Payment Voucher matches Valuation
63	VAL/KRT/KLJ/MARP/10 9	22,101,477.50	PV-00009813	22,101,477.50	1,900,408.31	Payment Voucher matches Valuation
64	VAL/KRT/KLJ/MARP/11 0	11,048,905.60	PV-00009814	11,048,905.60	950,046.53	Payment Voucher matches Valuation
65	VAL/KRT/KLJ/MARP/11 1	12,271,903.25	PV-00009815	12,271,903.25	1,055,206.69	Payment Voucher matches Valuation
66	VAL/KRT/KLJ/MARP/11 2	4,066,342.40	PV-00009816	4,066,342.40	349,646.80	Payment Voucher matches Valuation
67	VAL/KRT/KLJ/MARP/11 3	50,437,190.30	PV-00009817	50,437,190.30	4,336,870.95	Payment Voucher matches Valuation
68	VAL/KRT/KLJ/MARP/11 4	58,407,124.70	PV-00009818	58,407,124.70	5,022,170.36	Payment Voucher matches Valuation
69	VAL/KRT/KLJ/MARP/11 9	21,213,286.60	PV-00009819	21,213,286.60	1,824,036.70	Payment Voucher matches Valuation
70	VAL/KRT/KLJ/MARP/12 0	12,648,274.04	PV-00009820	12,648,274.04	1,087,569.15	Payment Voucher matches Valuation
71	VAL/KRT/KLJ/MARP/12 1	30,684,910.50	PV-00009821	30,684,910.50	2,638,459.76	Payment Voucher matches Valuation
72	VAL/KRT/KLJ/MARP/12 2	5,294,381.40	PV-00009822	5,294,381.40	455,240.44	Payment Voucher matches Valuation

Consolidated PAP List						
No.	Val. Number	Valuation Report Total	Payment Voucher No.	Payment Voucher Total	Interest Payment	Notes
73	VAL/KRT/KLJ/MARP/123	115,685,840.77	PV-00009823	115,685,840.77	9,947,313.86	Payment Voucher matches Valuation
74	VAL/KRT/KLJ/MARP/124	7,761,694.20	PV-00009824	7,761,694.20	667,393.78	Payment Voucher matches Valuation
75	VAL/KRT/KLJ/MARP/125	1,899,314.20	PV-00009825	1,899,314.20	163,313.63	Payment Voucher matches Valuation
76	VAL/KRT/KLJ/MARP/127	7,474,549.20	PV-00009826	7,474,549.20	642,703.43	Payment Voucher matches Valuation
77	VAL/KRT/KLJ/MARP/131	34,228,301.30	PV-00009827	34,228,301.30	2,943,140.26	Payment Voucher matches Valuation
78	VAL/KRT/KLJ/MARP/132	4,560,055.20	PV-00009828	4,560,055.20	392,098.98	Payment Voucher matches Valuation
79	VAL/KRT/KLJ/MARP/133	2,277,024.20	PV-00009829	2,277,024.20	195,791.24	Payment Voucher matches Valuation
80	VAL/KRT/KLJ/MARP/134	15,370,143.40	PV-00009830	15,370,143.40	1,321,610.66	Payment Voucher matches Valuation
81	VAL/KRT/KLJ/MARP/135	2,864,711	PV-00009831	2,864,711	246,323.83	Payment Voucher matches Valuation
82	VAL/KRT/KLJ/MARP/136	16,889,270.40	PV-00009832	16,889,270.40	1,452,233.83	Payment Voucher matches Valuation
83	VAL/KRT/KLJ/MARP/137	5,452,613	PV-00009833	5,452,613	468,846.08	Payment Voucher matches Valuation
84	VAL/KRT/KLJ/MARP/138	1,919,645.80	PV-00009834	1,919,645.80	165,061.85	Payment Voucher matches Valuation
85	VAL/KRT/KLJ/MARP/139	126,262,418.20	PV-00009835	126,262,418.20	10,856,746.98	Payment Voucher matches Valuation
86	VAL/KRT/KLJ/MARP/140	13,251,243.80	PV-00009836	13,251,243.80	1,139,415.85	Payment Voucher matches Valuation
87	VAL/KRT/KLJ/MARP/144	17,378,758.10	PV-00009838	17,378,758.10	1,494,322.56	Payment Voucher matches Valuation

Consolidated PAP List						
No.	Val. Number	Valuation Report Total	Payment Voucher No.	Payment Voucher Total	Interest Payment	Notes
88	VAL/KRT/KLJ/MARP/14 5	3,822,425.20	PV-00009839	3,822,425.20	328,673.44	Payment Voucher matches Valuation
89	VAL/KRT/KLJ/MARP/14 6	4,183,914	PV-00009840	4,183,914	359,756.26	Payment Voucher matches Valuation
90	VAL/KRT/KLJ/MARP/14 7	90,159,847.80	PV-00009841	90,159,847.80	7,752,446.61	Payment Voucher matches Valuation
91	VAL/KRT/KLJ/MARP/14 8	819,834	PV-00009842	819,834	70,493.90	Payment Voucher matches Valuation
92	VAL/KRT/KLJ/MARP/14 9	41,117,474.90	PV-00009843	41,117,474.90	3,535,509.84	Payment Voucher matches Valuation
93	VAL/KRT/KLJ/MARP/15 1	3,966,318.80	PV-00009844	3,966,318.80	341,046.21	Payment Voucher matches Valuation
94	VAL/KRT/KLJ/MARP/15 3	9,694,768.19	PV-00009845	9,694,768.19	833,610.24	Payment Voucher matches Valuation
95	VAL/KRT/KLJ/MARP/15 4	2,723,556.60	PV-00009846	2,723,556.60	234,186.59	Payment Voucher matches Valuation
96	VAL/KRT/KLJ/MARP/16 0	8,887,254	PV-00009847	8,887,254	764,175.67	Payment Voucher matches Valuation
97	VAL/KRT/KLJ/MARP/16 1	206,629,509.48	PV-00009848	206,629,509.48	17,767,157.76	Payment Voucher matches Valuation
98	VAL/KRT/KLJ/MARP/16 2	99,669,371.38	PV-00009849	99,669,371.38	8,570,128.48	Payment Voucher matches Valuation
99	VAL/KRT/KLJ/MARP/16 3	90,143,277.24	PV-00009850	90,143,277.24	7,751,021.78	Payment Voucher matches Valuation
100	VAL/KRT/KLJ/MARP/16 4	23,450,214.16	PV-00009851	23,450,214.16	2,016,280.21	Payment Voucher matches Valuation
101	VAL/KRT/KLJ/MARP/16 7	85,701,111.24	PV-00009852	85,701,111.24	7,369,059.57	Payment Voucher matches Valuation
102	VAL/KRT/KLJ/MARP/16 8	35,802,044.04	PV-00009853	35,802,044.04	3,078,459.44	Payment Voucher matches Valuation

Consolidated PAP List						
No.	Val. Number	Valuation Report Total	Payment Voucher No.	Payment Voucher Total	Interest Payment	Notes
103	VAL/KRT/KLJ/MARP/169	72,649,432.88	PV-00009854	72,649,432.88	6,246,803.46	Payment Voucher matches Valuation
104	VAL/KRT/KLJ/MARP/170	41,189,497.88	PV-00009855	41,189,497.88	3,541,702.77	Payment Voucher matches Valuation
105	VAL/KRT/KLJ/MARP/172	142,997,088.60	PV-00009856	142,997,088.60	12,295,687.28	Payment Voucher matches Valuation
106	VAL/KRT/KLJ/MARP/173	122,966,570.65	PV-00009857	122,966,570.65	10,573,351.62	Payment Voucher matches Valuation
107	VAL/KRT/KLJ/MARP/174	53,769,578.20	PV-00009858	53,769,578.20	4,623,408.25	Payment Voucher matches Valuation
108	VAL/KRT/KLJ/MARP/175	26,870,109.90	PV-00009859	26,870,109.90	2,310,441.92	Payment Voucher matches Valuation
109	VAL/KRT/KLJ/MARP/176	4,353,840.70	PV-00009860	4,353,840.70	374,367.51	Payment Voucher matches Valuation
110	VAL/KRT/KLJ/MARP/177	7,922,280	PV-00009861	7,922,280	681,201.82	Payment Voucher matches Valuation
111	VAL/KRT/KLJ/MARP/178	42,398,768.50	PV-00009862	42,398,768.50	3,645,682.61	Payment Voucher matches Valuation
112	VAL/KRT/KLJ/MARP/179	9,341,430.30	PV-00009863	9,341,430.30	803,226.56	Payment Voucher matches Valuation
113	VAL/KRT/KLJ/MARP/180	4,582,210.80	PV-00009864	4,582,210.80	394,004.04	Payment Voucher matches Valuation
114	VAL/KRT/KLJ/MARP/181	77,507,716.35	PV-00009865	77,507,716.35	6,664,545.77	Payment Voucher matches Valuation
115	VAL/KRT/KLJ/MARP/182	19,707,477.80	PV-00009866	19,707,477.80	1,694,558.77	Payment Voucher matches Valuation
116	VAL/KRT/KLJ/MARP/185	3,628,712.40	PV-00009867	3,628,712.40	312,016.93	Payment Voucher matches Valuation
117	VAL/KRT/KLJ/MARP/186	17,227,385.20	PV-00009868	17,227,385.20	1,481,306.67	Payment Voucher matches Valuation

Consolidated PAP List						
No.	Val. Number	Valuation Report Total	Payment Voucher No.	Payment Voucher Total	Interest Payment	Notes
118	VAL/KRT/KLJ/MARP/187	2,143,894.80	PV-00009869	2,143,894.80	184,344.03	Payment Voucher matches Valuation
119	VAL/KRT/KLJ/MARP/17	7,678,287.90	PV-00009870	7,678,287.90	660,222.02	Payment Voucher matches Valuation
120	VAL/KRT/KLJ/MARP/24	6,312,336.60	PV-00009871	6,312,336.60	542,769.91	Payment Voucher matches Valuation
121	VAL/KRT/KLJ/MARP/32	33,191,300	PV-00009872	33,191,300	2,853,973.11	Payment Voucher matches Valuation
122	VAL/KRT/KLJ/MARP/36	17,935,425.60	PV-00009873	17,935,425.60	1,542,187.93	Payment Voucher matches Valuation
123	VAL/KRT/KLJ/MARP/41	144,889,684.40	PV-00009874	144,889,684.40	12,458,423.23	Payment Voucher matches Valuation
124	VAL/KRT/KLJ/MARP/42	28,619,020.26	PV-00009875	28,619,020.26	2,460,822.99	Payment Voucher matches Valuation
125	VAL/KRT/KLJ/MARP/48	38,210,962.60	PV-00009876	38,210,962.60	3,285,591.70	Payment Voucher matches Valuation
126	VAL/KRT/KLJ/MARP/51	20,016,357.85	PV-00009877	20,016,357.85	1,721,118.09	Payment Voucher matches Valuation
127	VAL/KRT/KLJ/MARP/52	81,613,662.55	PV-00009878	81,613,662.55	7,017,597.93	Payment Voucher matches Valuation
128	VAL/KRT/KLJ/MARP/57	68,806,535.70	PV-00009879	68,806,535.70	5,916,369.73	Payment Voucher matches Valuation



