

Complaint (Request for Inspection) Form

To:

The Chair, Inspection Panel

The World Bank Accountability Mechanism

MSN: MC 10-1007

1818 H St., NW, Washington, DC 20433, USA.

Fax: +1(202)-522-0916. Email: ipanel@worldbank.org

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

Section 1: Complaint

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

1. As a community we express our strongest reservation regarding the South Link Road project which is going to result in mass displacement, loss of livelihood. As discussed via the video conference 90% of those affected own less than 2 acres of agricultural which ensures their food security at a bare minimum level and on losing their meagre source of income and houses a question mark can be raised on the future of their coming generations.
2. The most ignored aspect of this project is the issue of environmental and noise pollution. The position taken by the NHA is preposterous at best that first the trees falling within the project area along with the orchards are going to be cut and replaced with new saplings that would take decades to mature and meanwhile the displaced population will bear the brunt of the environmental pollution waiting for the remedial measures to work and Peshawar the nearest city to the affected areas is already one of the most polluted cities in Pakistan and it would be insane to turn a purely agricultural area into a hub of pollution for apparent benefit. The noise pollution would have an even greater impact since most of this area is already grappling with the ever-increasing volume of noise pollution whereas this project would bring in a level of noise pollution to extreme levels both during the construction phase and the operational phase and no solution has been suggested in the project document besides dubious and unworkable solutions. Reports of various government departments on this issue are attached as Annexure A.
3. Besides the issue of loss of livelihood and houses another serious concern over the destruction of their traditional values and culture. As the WB can realize that the whole stretch of land identified to be taken over for the project comprises thousands of houses in the vicinity of this elevated highway and houses within a range of 50 meters shall be exposed to vehicular traffic day and night and how do they protect their privacy raises a big question mark on the whole project. The women folk cannot be expected to hide their faces within the confines of their own homes. It is also added that the average height of the boundary walls in this area is around 11 feet so how can they maintain their purdah with the height of the road at 22 feet and additionally the height of the vehicles plying the road would raise the total height to around 30 feet severely affecting the ability of the women folk to perform their daily chores fully exposed to unknown individuals like the truck and bus drivers plying the proposed route.
4. The community is surprised at the attitude of the World Bank for reviving a sick project that was signed in 2018 with multiple changes in the alignment from time to time. Having

some experience on working with WB projects it is surprising that the loan commitments have been extended without any plausible reasons by the WB and to our understanding all donor projects are time bound and are invariably shelved if satisfactory progress is not achieved within a certain time frame. The community is baffled by the approach of the WB for their affiliation for this particular project.

5. After the passage of the Ordinance for Amendment to the NHA act the NHA has only the mandate to construct link roads from one Motorway to another and in this case no motorway exists at either end. (Annexure B)
6. The community was never consulted on the viability, economic benefit and ways to alleviate their concerns. Though there were no general elections for an extended period of time but the elected local bodies members representing the community were never consulted and to the best of our knowledge all the documents submitted to the Executive Board were based on assumption rather than proper consultation process with the community. A list of members of the local bodies is attached to confirm that only irrelevant people were consulted and duped by informing that the surveys are intended to assess the need for WB and UNHCR assistance without any mention of the road project. (Annexure C).
7. Another issue prevalent in the area is the disparity between ownership documents and possession and cultivation of the land. The only settlement of this issue was done in 1927 and since then this has not been discussed or deliberated upon by the government so a constant conflict exists between the two groups in the whole belt. This seriously affects the land compensation issue and there exists a distinct possibility of armed conflict between the absentee owners and tillers.
8. As mentioned earlier there have been multiple changes to the alignment of this project and the community would like to know how can the WB allow a change in the scope of work. Having personnel project experience, it is one of the most difficult tasks to continually alter the scope and quantity of work.
9. All the regulatory agencies like the Agriculture Department, Forest Department, Environmental Protection Agency and many other departments have disagreed with the contentions of NHA. (Annexure A)
10. The project is supposed to be a component of the KP Economic Corridor linking Pakistan and Afghanistan for trade facilities but with daily clashes on the borders between the two countries who in their right mind would conceive and execute such a project and the mortal fear of the community is that after destroying our livelihood the project will be eventually abandoned in light of the prevalent geopolitical situation.
11. No government agency has ever paid the agreed compensation in a timely manner, the case in point being the SNGPL destroying a vast stretch of agricultural land and people are waiting for compensation for the last 6 years. The compensation paid for land acquisition is pittance compared to the going market rate as determined by the Land Acquisition Act of 1894 and no changes to the Act have been made for more than a century so the anguish of the community can be appreciated and the government has a poor record of payment to the affected community so the WB is requested to join in the determination of a fair market rate if the project somehow takes off.
12. Dozens of our graveyards are going to be uprooted so in the end the community will not have a place to live in, no means of livelihood and no place to be buried in. The NHA report

that indicates graveyards is based on the Land Settlement of 1927 and has not been revised in almost a century and dozens of private graveyards of individuals have come up and have been conveniently ignored in the appraisal report.

13. We are thankful to the Pakistan chapter of Human Rights Watch and the Daily Dawn for taking notice and writing a comprehensive report on the repressive colonial era Land Acquisition Act of 1894 which has affected a large segment of the population in this country. The report is shared as (Annexure D)
14. An unfortunate act of violence did occur in the project area against the survey staff of project and the lynching was prevented by the intervention of the area elders and members of the local bodies but we foresee more of these incidents if the project is continued.
15. A court of law has already issued an injunction against any progress on the project and we fear a long drawn legal battle reaching the Supreme Court of Pakistan and its up to the WB to imagine the delays this project is going to face in the coming years.
16. Please Find (Annexure E) i.e., signatures of the affected from different villages of the project area.
17. List of the emails (Correspondence with World Bank) attached as Annexure F.

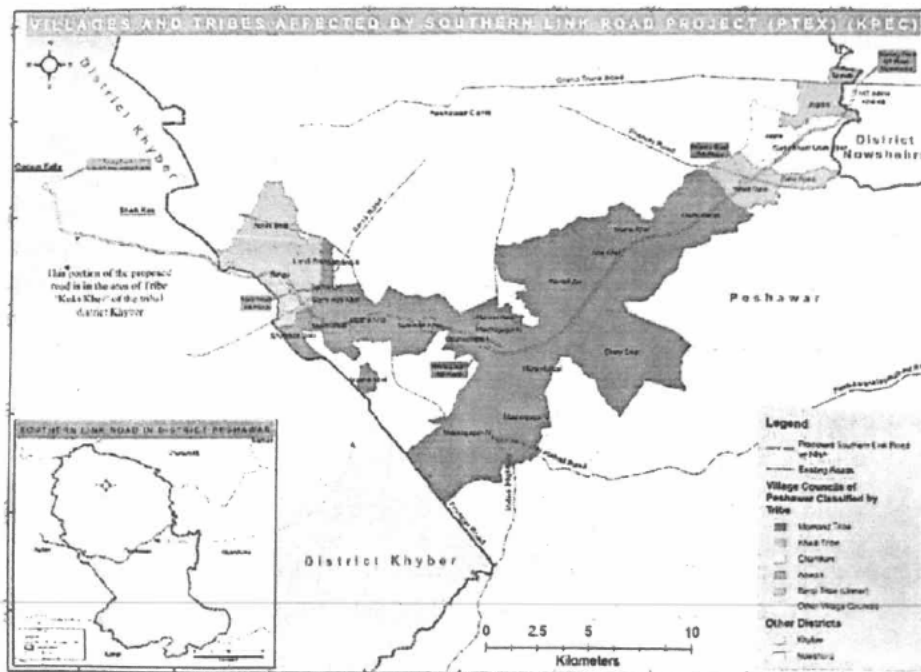
In light of the above we seriously believe that the WB Executive Board has been misled on the benefits of this project and requires a serious investigation and inquiry.

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

Pakistan Khyber Pass Economic Corridor Project (P159577)

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

Between Tarnab and Sango (in districts of Nowshera and Peshawar KPK Pakistan)



4. Do you live in the project area?

Yes

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

The community nominated me to write to WB regarding our concern and several emails were written and answered by the Bank. (Annexure D)

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

- Consultations not held with the community at any level.
- Environmental concerns not addressed.
- Our social norms not taken into consideration.
- Our displacement and loss of livelihoods not addressed.

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

YES

Several of our villagers are under police radar for participating in protest meetings against this project.

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

Yes

Section 2: Contact Information

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

Complainants:

Representing a complainant or community:

Other: (Please explain)

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

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

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

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

Signature 1	Signature 2
[REDACTED]	[REDACTED]

Signatures (more signatures can be sent as an attachment)

Your personal data will only be used and disclosed for the purpose for which it was collected in accordance with the WBG Data Privacy Policy. Inspection Panel will not disclose information provided by complainants that may reveal their identity outside of responsible World Bank units without their consent.

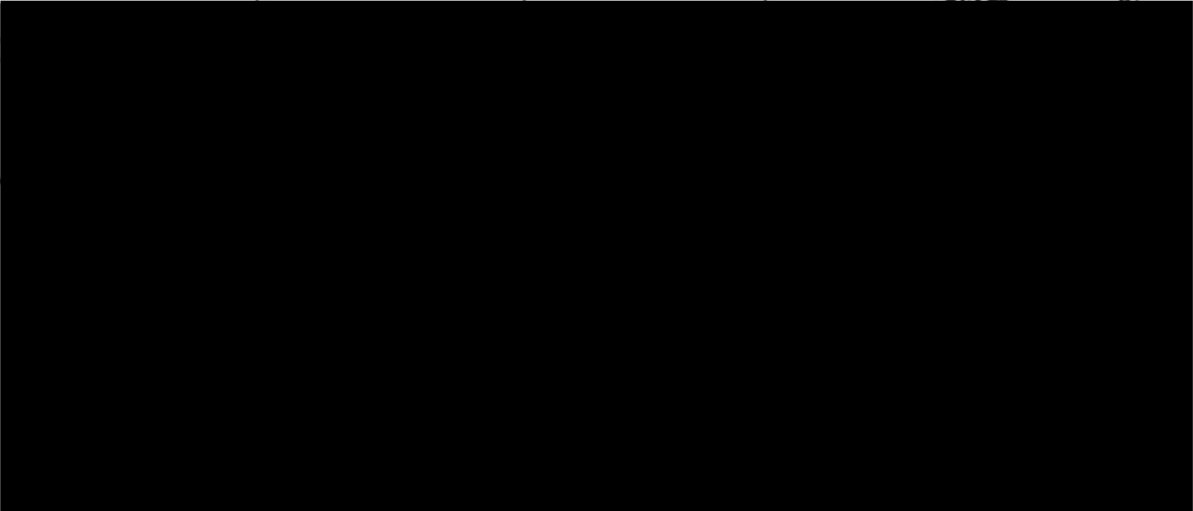
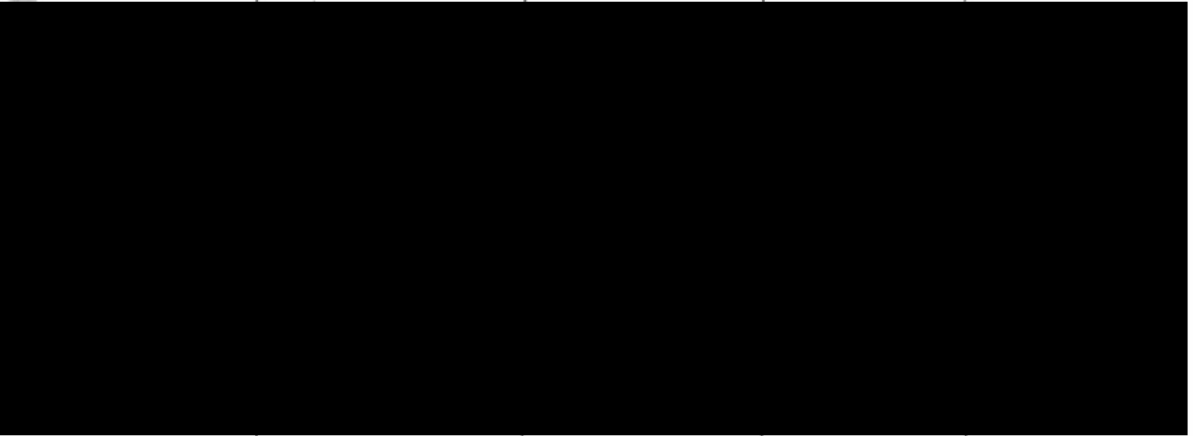
NOTES:

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

We Reject Southern Bypass Link Road (KPEC)

No	Name	CNIC	Phone No	Designation	Signature
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We Reject Southern Bypass link Road (KPEC)

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LIST OF AFFECTEES

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LIST OF AFFECTEES

Village Name [REDACTED] NEIGHBORHOOD [REDACTED]

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①	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
②	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
③	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
④	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

LIST OF AFFECTEES

Village Name [REDACTED] NEIGHBORHOOD [REDACTED]

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LIST OF AFFECTEES

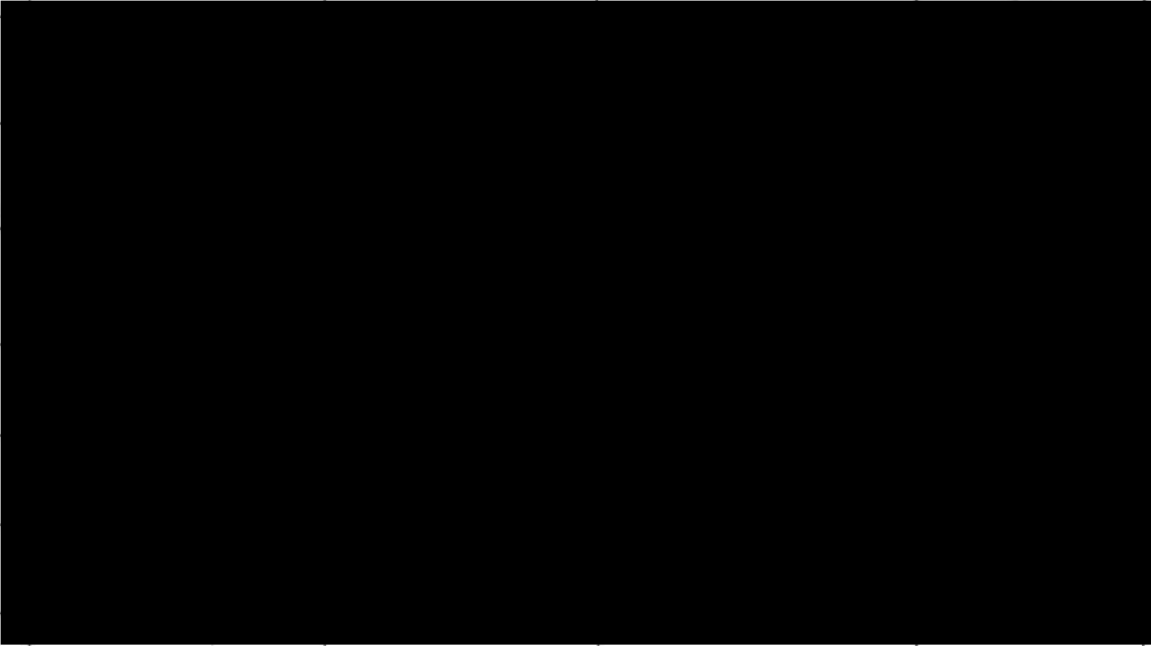
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LIST OF AFFECTEES

Village Name [REDACTED] NEIGHBORHOOD [REDACTED]

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LIST OF
AFFECTEES

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LIST OF
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LIST OF
AFFECTEES

Village Name



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LIST OF AFFECTEES

Village Name

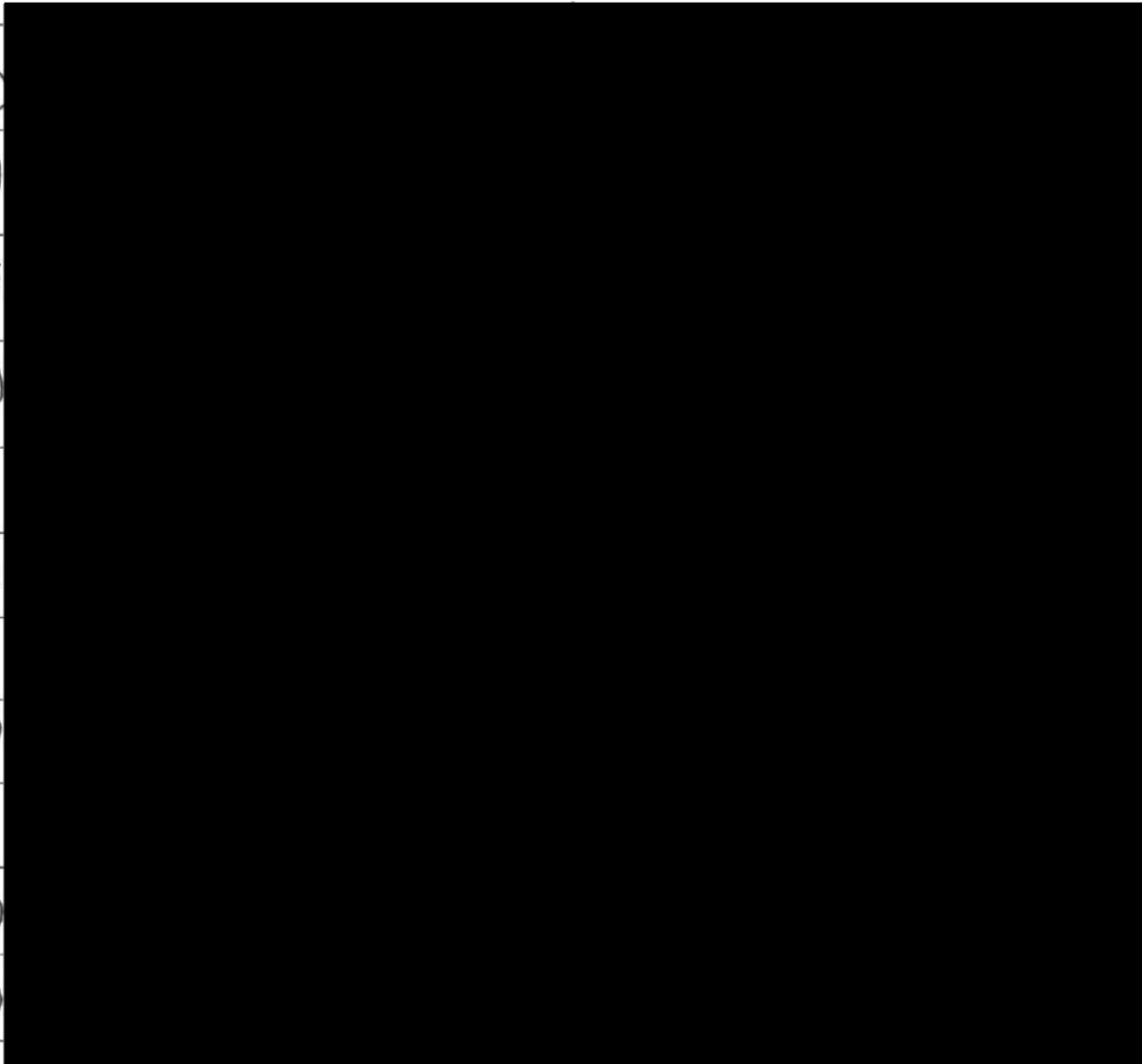


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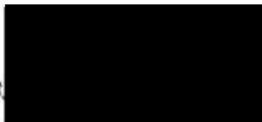
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LIST OF
AFFECTEES

Village Name



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AFFECTEES

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Village Name

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LIST OF AFFECTEES

Village Name

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LIST OF AFFECTEES

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LIST OF AFFECTEES

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LIST OF AFFECTEES

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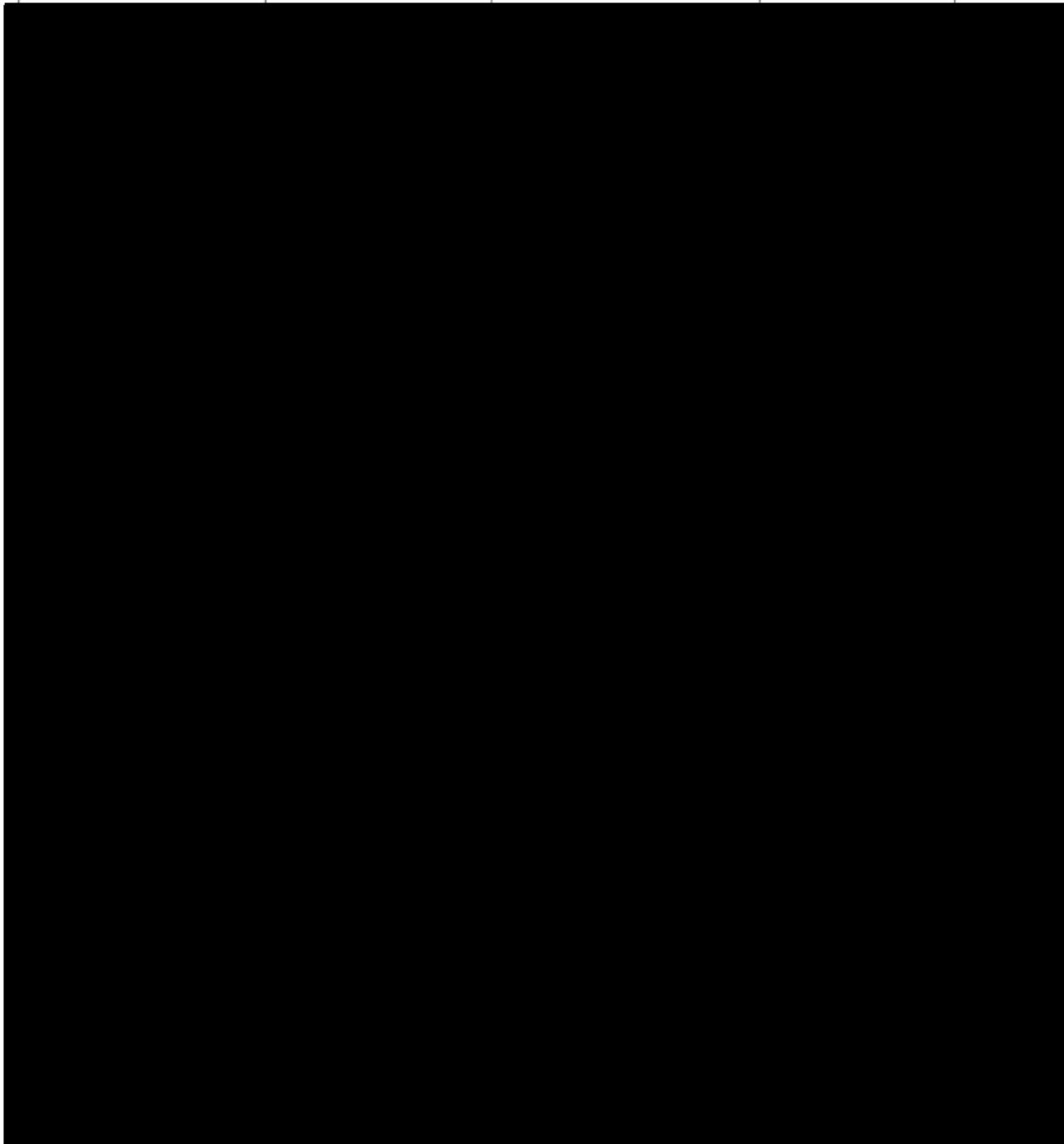
LIST OF AFFECTEES

Village Name



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LIST OF AFFECTEES

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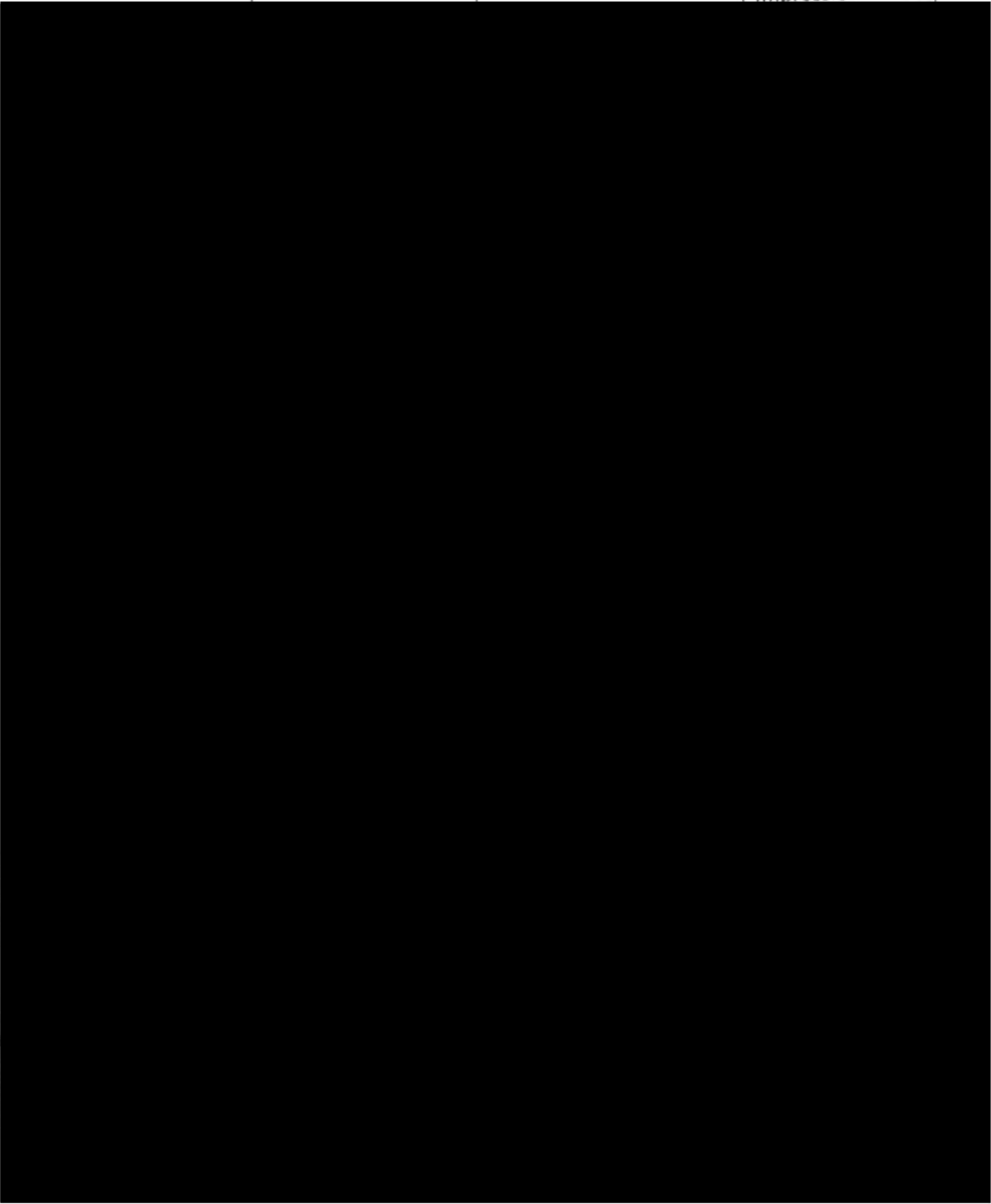
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LIST OF AFFECTEES

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LIST OF AFFECTEES

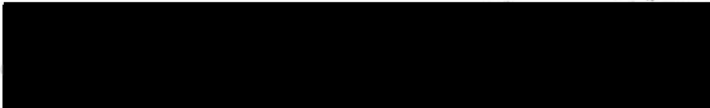
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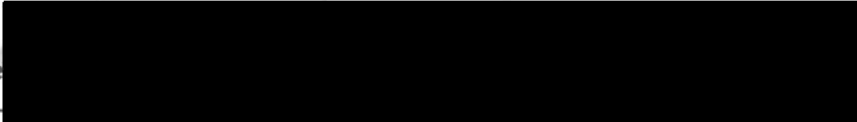
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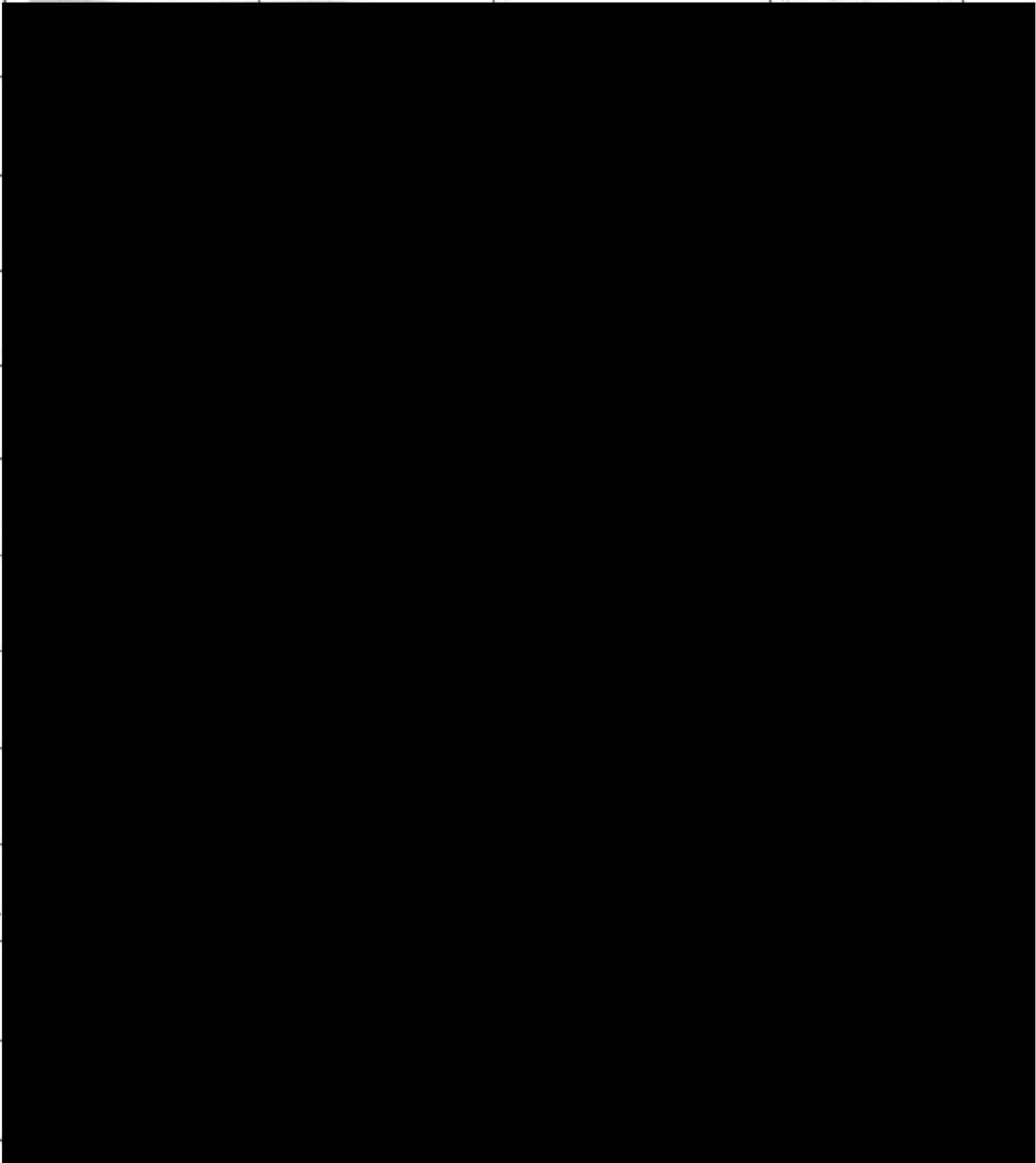
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LIST OF AFFECTEES

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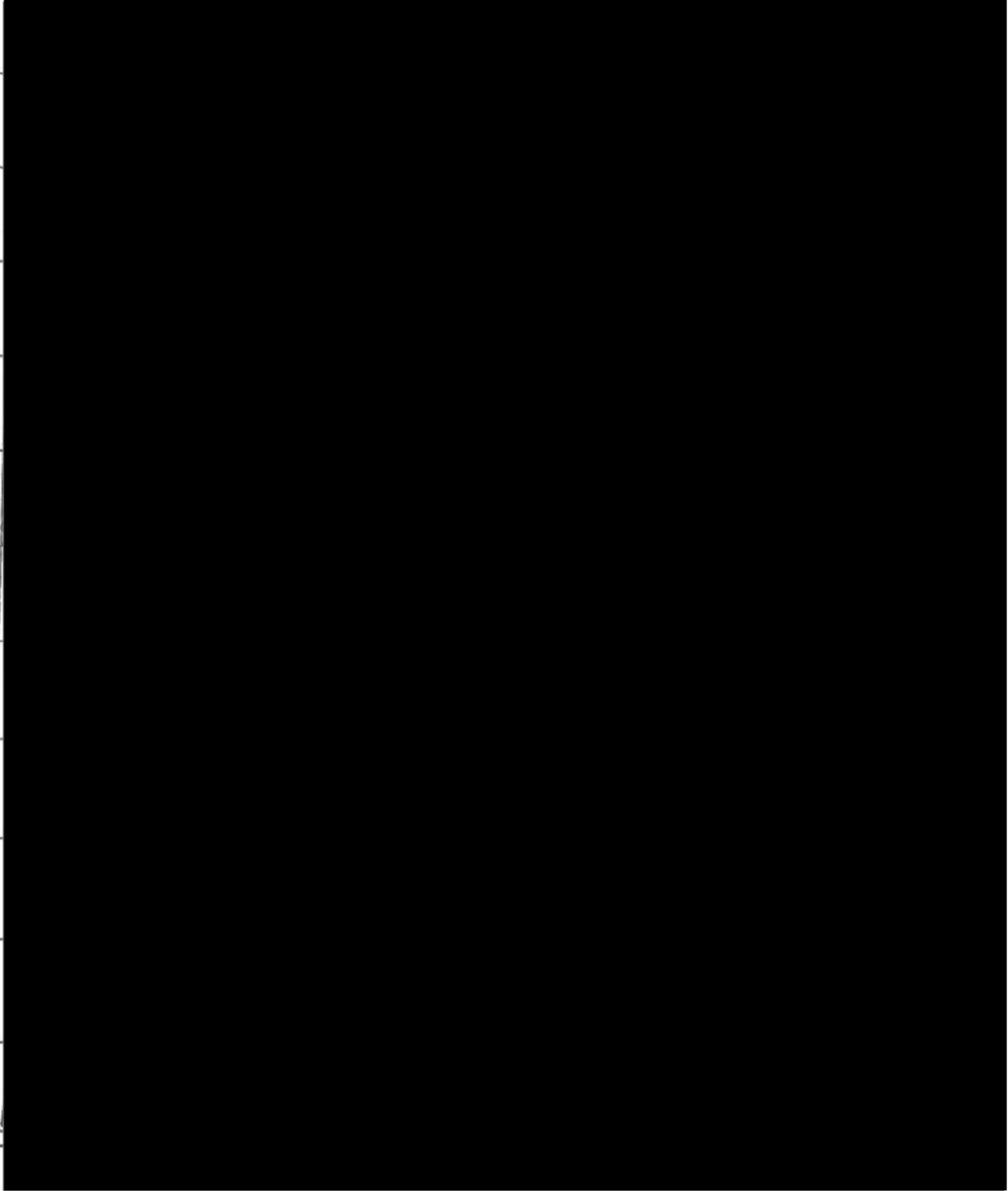
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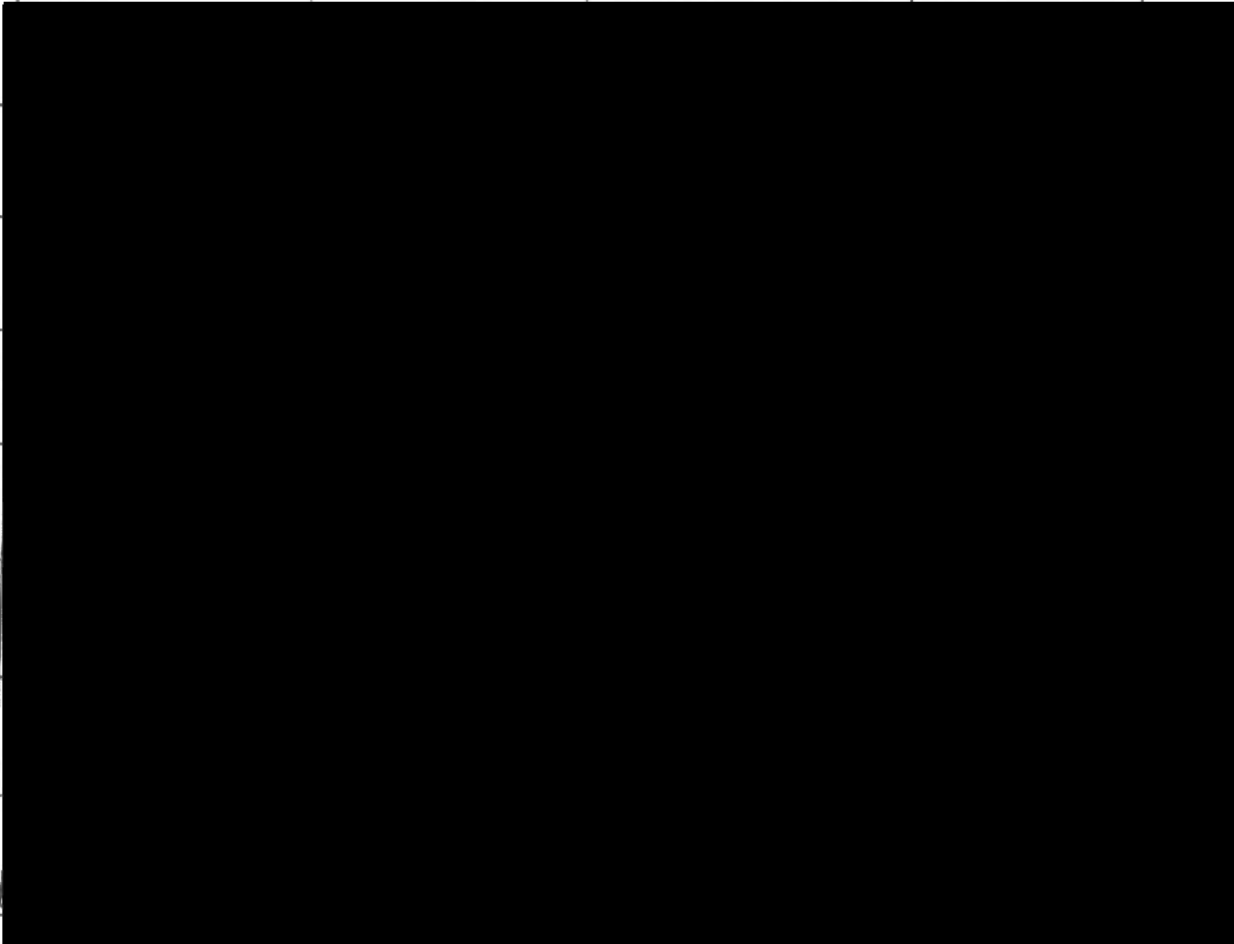
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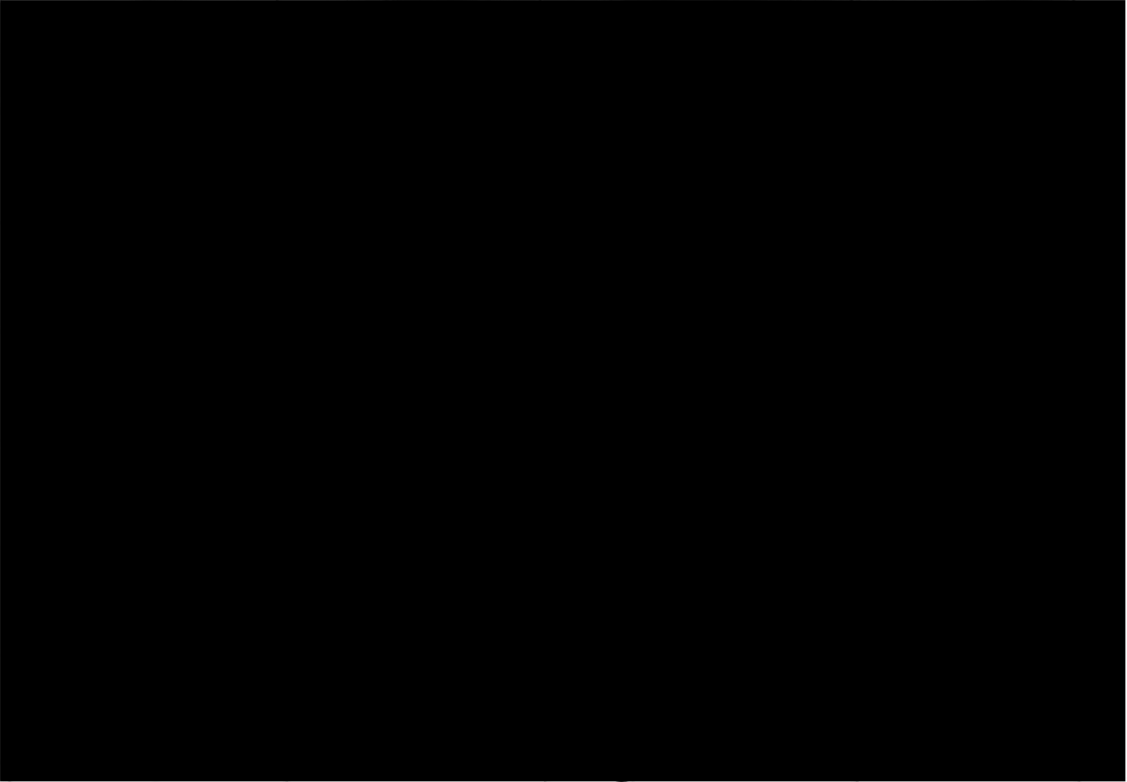
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List of Documents Attached to the Request

These documents may be available upon request to the Inspection Panel.

#	Document Title	Summary
1	Annexure A	An excerpt from a report summarizing the consultation with Government Departments
2	Annexure B	Ordinance No. V of 2023, An Ordinance to amend the National Highway Authority Act, 1991
3	Annexure C	A list of names, contact information and signatures that the Request states are of members of local bodies who were consulted for the Project's survey activities
4	Annexure D	An article from Dawn titled, "Govt urged to repeal 'abusive' colonial-era land acquisition law"
6	Annexure F	Email correspondences between the Requesters and the Bank's Grievance Redress Services
7	Other Documents	<ul style="list-style-type: none">• Court Stay Order dated May 29, 2024• October 24, 2023 resolution nominating an individual [name redacted] as a convener of the committee on the construction of the Southern Link Road