

Nessim Ahmad
Director
Environment and Social Safeguard Division

Dear Sir,

I have been following the development of this policy closely for the last couple of months. I am a development practitioner affiliated with HRD Network, Islamabad and Connective Action, also an NGO based in Islamabad. (I was formerly working for an NGO called LEAD Pakistan; my colleagues participated in the working group on Environmental Safeguards), I was also corresponded and provided feedback formally on Involuntary Resettlement and Indigenous peoples safeguards policy to Julia Cumin.

I am pleased to see that the policy has been amended and allows for participation and consultation of all relevant affectees as well as attention to the needs of vulnerable groups, especially of those below the poverty line, the landless, the elderly, women and children. In addition the policy also focuses on improving, and making attempts for restoring livelihoods of affected households undergoing involuntary resettlement. I am particularly pleased to note that the Indigenous peoples safeguards policy builds in gender sensitive social assessments to appraise and assess the potential project impacts. It further more stresses that "options preferred by the affected Indigenous Peoples" would be given due consideration for the provision of project benefits and for developing mitigation measures and ensuring their participation and consultation in "designing, implementing, and monitoring measures to avoid adverse impacts, or, when avoidance is not feasible, to minimize, mitigate, or compensate for such effects; and (b) in tailoring project benefits for them in a culturally appropriate manner".

Also commendable is that the policy for Involuntary Resettlement states that displaced persons without titles to land or any recognizable legal rights to land are eligible for resettlement assistance, and compensation for loss of non-land assets. My concern however relates to the compensation for all movable and immovable assets in both these policies to women and the elderly. Too often, women are abandoned by men during resettlement as new assets are handed over to the male head of the household. Hence it would be useful to go one step further and build in a mechanism for the registration of all new assets of a family as joint property of the husband and wife thereby changing women's position and decision making power through control of family assets.

Furthermore, it would be useful to expand the scope of monitoring and assessing resettlement outcomes, their impacts on the standards of living of the affected persons' to include *women and the elderly*.

Also the use of 'culturally appropriate' measures seems problematic at times particularly in the case of capacity building. Women stand to lose a great deal here since only patriarchal norms seem are culturally appropriate in the current socio political environment! This could be deleted or rephrased too.

I would also like to request you to forward contact details of the contact person in Pakistan doe Safeguards policy. I would also like this opportunity to indicate that I would be interested participate in any further consultations and discuss the issue further. I am currently associated with Connective Action, an NGO based in Islamabad and can be contacted at ayeshashaukat@gmail.com.

I look forward to your response,

Sincerely,

Ayesha Shaukat