Abbreviated Resettlement Action Plan

"Project for the Improvement of Water Supply in Peri-Urban Areas of Lusaka City in the Republic of Zambia"

For

LUSAKA WATER SUPPLY AND SANITATION COMPANY LIMITED

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1 Necessity of Land Acquisition and Resettlement

(1) Project Components Causing Relocation and Affected Areas

In this project, no relocation of residents is forseen while an economic relocation will be necessary in order to implement the project. The key project components causing economic relocation and land acquisition are described as follows:

- To extract groundwater through boreholes with other facilities, i.e. pump operation room, guard room, and generator room.
- To transmit it through raw water transmission pipe of about 11 - 12km.
- To pump it to balancing elevated tanks in the water supply area, i.e. northwest part of Garden Park with a water pump room, a transformer room, and a generator room each.
- To distribute it through the water distribution network in the water supply area.

The map below shows the areas where land acquisition and other (economic) relocations will take place.

Figure 1 Location map of the project's water source wells, pump station/water storage tank (blue), raw water transmission pipeline (green), and treated water transmission pipeline (orange)

Among the affected areas, the land along which the water mains (approximately 11–12 km) are to be buried is owned and managed by the national government. The remaining land—including the sites of four production wells, the pump station, the raw water reservoir, and the planned construction sites for elevated water tanks in the service area—is privately owned.

(2) Alternative plans at the initial design stage

During the initial design phase of this project, four alternative routes for the water transmission pipeline were evaluated to determine how to avoid or minimize the need for relocation.

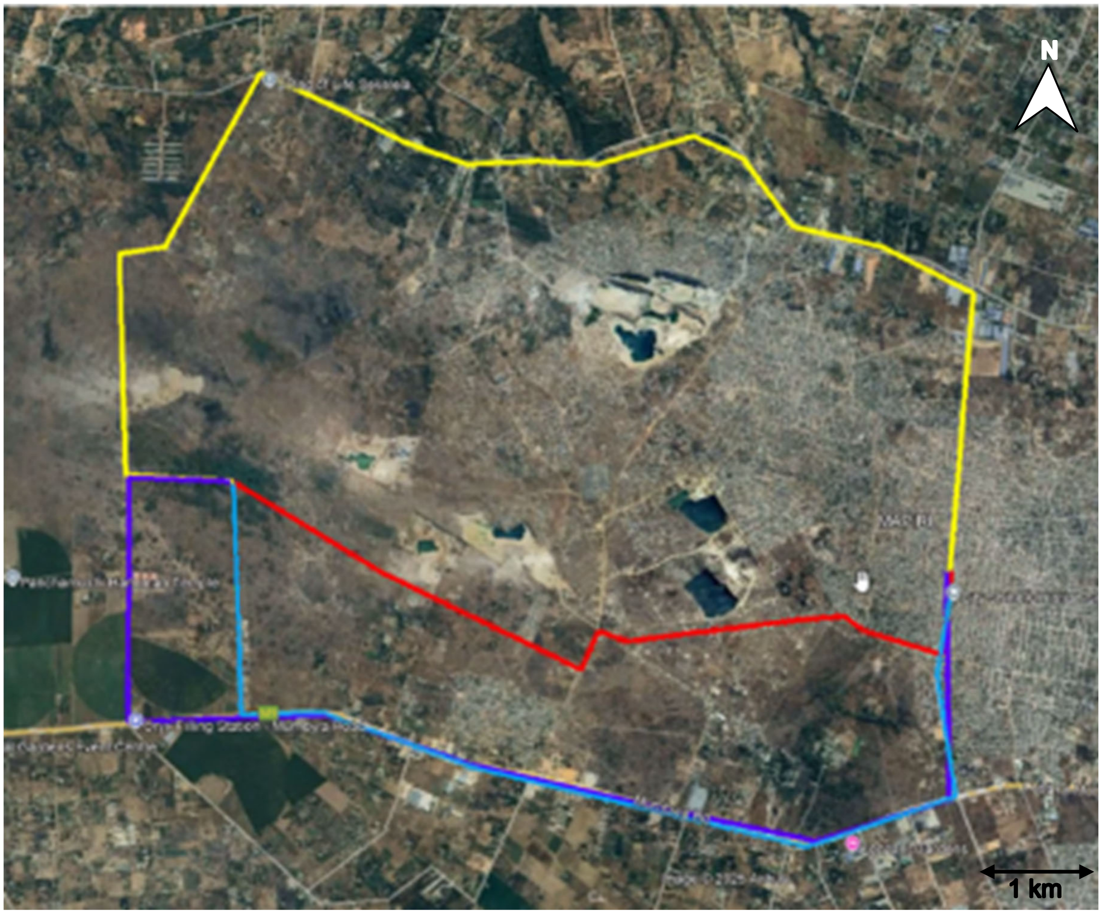

Figure エラー! 指定したスタイルは使われていません。 Waterpipe Routes Considered at the Initial Design Stage (yellow, red, blue, and light blue)

The results of the comparison of the water supply pipe routes shown in the figure above are summarized in the table below.

Table 1 Comparison of Waterpipe Routes at the Initial Design Stage

No.	Route	Waterpipe (km)	Land Acquisition and Relocation
1	North Bypass Route (Yellow)	13.9	Moderate land acquisition and relocation.
2	The shortest Route (Red)	7.3	The largest land acquisition and relocation.
3	Southern Bypass Route 1 (Blue)	12.7	Moderate land acquisition and relocation.
4	Southern Bypass Route 2 (Light Blue)	11.0	The least land acquisition and relocation.

Note: The colors of the routes in parentheses correspond to the colors of the routes in the figure above.

Option 1 was excluded because it involved the longest water pipeline, resulting in higher construction costs, and also the land to be acquired was not minimal. Option 2 had the shortest water pipeline, but required acquisition of land from the largest number of landowners as it crossed private property such as farmland, so it was excluded. Option 3 involved a pipeline distance approximately 10% longer than Option 4 and would have required acquisition of larger land and more economic relocation consequently. Therefore Option 4 was selected as the basic consept for the route of the water pipeline.

(3) Methods to minimize relocation during the implementation of the project

As mentioned above, among the affected areas, the land along which the water supply pipeline will be buried (approximately 11–12 km) is owned and managed by the national government, while the remaining land (four production wells, the pump station, the raw water reservoir, and the planned construction sites for elevated water tanks in the service area) is privately owned. As will be described in detail later, the former will involve short-term, economic relocation (without resident resettlement), while the latter will involve land acquisition, as there are no alternative sites in the vicinity and in consideration of the landowners' requests.

The former primarily involves the temporary relocation of street vendors who do not hold land, usage, or occupancy rights on public land (public roads), or temporary and partial restrictions on the use of access roads connecting gas stations and other facilities to public roads. To minimize relocations as much as possible during project implementation, the plan is to divide the project into sections and carry out construction in stages, thereby keeping the duration of temporary street vendor relocations and restrictions on the use of access roads to gas stations and other facilities to a minimum.

(4) Recipients of compensation and livelihood recovery assistance

Note that, in this project, persons meeting any of the following four criteria are eligible to receive compensation and livelihood restoration support:

・Those who hold legal rights to the land

・Those who do not hold legal rights to the land but would be granted such rights under the legal system of the relevant country if they were to claim them

・Those whose legal rights to or claims regarding the land they occupy cannot be verified (e.g., tenants, merchants, laborers, employees, squatters, and other building owners)

・Those who will lose their primary means of livelihood due to the impact on the land or structures they own

2 Legal Framework for Land Acquisition and Resettlement

(1) Overview of the relevant national laws and regulations concerning land acquisition and resettlement

The table below summarizes Zambian laws and regulations for land acquisition and resettlement.

Table 2 Laws and Regulations related to Zambian Resettlement and Land Acquisition

Name of Law	Main Contents
Constitution of Zambia (Amendment) Act No. 2 of 2016	• Provides for protection from deprivation of property. Property may only be compulsorily acquired under authority of an Act of Parliament, for public purposes, and subject to prompt payment of adequate compensation and right of access to the courts. This forms the constitutional basis for land acquisition and guarantees compensation and legal recourse for affected persons during resettlement.
Environmental Management Act No. 12 of 2011	• Establishes the legal framework for environmental management and creates the Zambia Environmental Management Agency. It provides for environmental assessment of projects and requires that environmental impacts be identified, predicted, and evaluated prior to project approval. This ensures that resettlement impacts are assessed within ESIA processes and that mitigation measures are incorporated into project planning.
Lands Act Cap 184 of 1995	• Provides for the administration of land in Zambia. It vests all land in the President and recognizes leasehold tenure, including the conversion of customary tenure to leasehold tenure. This Act underpins land tenure arrangements relevant to land acquisition and determines how affected land rights are formalized and compensated during resettlement.
Land Acquisition Act Cap 189 of 1970	• Provides for the compulsory acquisition of land by the President for public purposes. It sets out procedures for acquisition, including publication of notices, entry onto land, and the assessment and payment of compensation. This is the primary legislation governing compulsory land acquisition and compensation procedures for displaced persons.
National Resettlement Policy 2024	• Provides policy guidance on the resettlement of persons displaced by development projects. It outlines principles for compensation, resettlement planning, and livelihood restoration. This policy directly guides the planning and implementation of resettlement processes, including livelihood restoration and support to affected persons.
Urban and Regional Planning Act No. 3 of 2015	• Provides for development planning and control, including the preparation and approval of integrated development plans and the regulation of land use and subdivision of land. This Act supports resettlement by guiding land use planning, zoning, and identification of suitable resettlement sites.
Lands and Deeds Registry (Amendment) Act No. 17 of 2021	• Provides for the registration of documents affecting land and interests in land, including the issuance and maintenance of certificates of title. This ensures formal registration of land rights, which is critical for verifying ownership and processing compensation during land acquisition and resettlement.
Valuation Surveyors Act Cap 207 of 1979	• Provides for the registration and regulation of valuation surveyors and governs the practice of valuation surveying in Zambia. This Act ensures that compensation for acquired land and assets is determined by qualified professionals using standardized valuation methods.
Access to Information Act No. 24 of 2023	• Provides for the right of access to information held by public bodies and establishes procedures for requesting and obtaining such information. This supports transparency in land acquisition and resettlement processes by enabling affected persons to access relevant project and compensation information.

The National Resettlement Policy 2024 serves as the guiding framework for land acquisition and resettlement in Zambia, and the Resettlement Department within the Office of the Vice President is the competent authority. Under this policy, compensation is paid at the higher of market value or replacement cost; it requires mutual agreement between the project operator and the beneficiary; and payment must be completed prior to the commencement of construction.

Regarding the specific calculation of land acquisition prices, replacement costs, and compensation amounts, the policy and the Valuation Surveyors Act (Cap. 207 of 1979) mandate that a qualified valuation surveyor calculate land values and compensation amounts. We visited the Government Department of Valuation and Property Management within the Ministry of Infrastructure, Housing and Urban Development), specifically the Government Department of Valuation and Property Management, to inquire about the methods for estimating and calculating compensation costs. We were informed that the calculation methods vary by project; fairness is maintained by having qualified valuation surveyors conduct appropriate appraisals under the supervision of the Government Department of Valuation and Property Management. We were advised that for this project as well, the valuation should be commissioned to a qualified valuation surveyor, and based on the results, the project operator and the beneficiaries should reach a mutual agreement (Land prices and compensation for reacquisition related to this project will be discussed later.)

(2) JICA's policy for "Involuntary Resettlement and Loss of Livelihood"

1. Involuntary resettlement and loss of means of livelihood are to be avoided when feasible by exploring all viable alternatives. If avoidance is not possible even after such examination, effective measures to minimize impacts and to compensate for losses must be taken upon agreement with the affected people.

2. Project affected people, such as people to be resettled involuntarily and/or people who may lose their livelihoods by the project, must be provided sufficient compensations and supports by the project proponents in a timely manner. Compensations must be calculated at full replacement cost as much as possible, and provided in advance. Project proponents must make efforts for the affected people to improve or at least restore their standards of living, income opportunities and production levels to the pre-project levels. Measures to achieve this may include: Providing land or monetary compensations for losses of land or assets, supporting for alternative sustainable livelihood, supporting for expenses necessary for relocation, and supporting for re-establishment of communities at resettlement sites.

3. Compensation standards are disclosed and consistently applied. The project affected persons need to be aware of the compensation standards. In principle, the contents of the individual compensation to be agreed are explained to the project affected persons in writing, and the project affected persons can confirm the contents at any time.

4. Appropriate participation of the project affected people and their communities must be promoted in the planning, implementation and monitoring of measures against involuntary resettlement and loss of livelihood.

5. For projects that result in large-scale involuntary resettlement, a Resettlement Action Plans (RAP) must be prepared and made available to the public prior to the resettlement and provision of compensation and support. In preparing the RAP, consultations must be held with the project affected people and communities, based on sufficient information made available to them in advance. When consultations are held, explanations must be given in languages and forms that are understandable to the project affected people. It is desirable that the RAP includes elements laid out in the Environmental and Social Standard (ESS) 5 of the World Bank's environmental and social policies.

(3) Comparison between JICA Guidelines and the Zambian Legal Framework

The table below outlines the differences between the JICA Environmental and Social Considerations Guidelines (JICA GL) and the Zambia's legal framework about the land acquisition and resettlement, as well as the project's resettlement policy based on these differences.

Table 3 Comparison between JICA GL and the Zambian Land Acquisition and Resettlement Framework

#	JICA GL and World Bank ESS5	Zambian Laws and Regulations	Gaps	Relocation Policy for this Project
1.	Involuntary resettlement and loss of means of livelihood are to be avoided when feasible by exploring all viable alternatives (JICAGL).	The National Resettlement Policy 2024 and other Zambian environmental or social laws do not stipulate anything about it. Environmental Management Act / No. 12 of 2011 (EMA), Section 29; and Environmental Impact Assessment Regulations / Statutory Instrument (SI) No. 3 of 2026 (EIA Regulations), Regulations 7 and 8 require the undertaking of environmental and social impact assessments prior to project approval, including the consideration of project alternatives, mitigation measures, and preparation of environmental and social impact assessment (ESIA) reports.	There is a significant gap as the Zambian laws left require consideration of alternatives, but they do not explicitly mandate avoidance or minimization of involuntary resettlement impacts as required by JICA GL/ESS5.	The RAP should document analysis of alternatives and demonstrate efforts to avoid or minimize displacement.
2.	Project affected people, (PAP) such as people to be resettled involuntarily and/or people who may lose their livelihoods by the project, must be provided sufficient compensations and supports by the project proponents in a timely manner (JICAGL).	Section 4.3 of the National Resettlement Policy 2024 stipulates "Promote compensation at the market and/or full replacement cost, whichever is higher for losses of livelihoods, assets and access to the assets attributable directly to the project." and "Facilitate the provision of compensation by the displacer to displaced persons before the developmental project's commencement."	No major gap was identified, but the Zambian laws are more detailed.	Compensation should be provided at the market and/or full replacement cost, whichever is higher for losses of livelihoods, assets and access to the assets attributable directly to the project. It should be given before the commencement of the civil work.
3.	Compensations must be calculated at full replacement cost as much as possible, and provided in advance (JICAGL).	The same section of the same policy above applies.	Same as above.	Same as above.
4.	Project proponents must make efforts for the affected people to improve or at least restore their standards of living, income opportunities and production levels to the pre-project levels (JICAGL).	The National Resettlement Policy 2024 and other Zambian environmental or social laws do not explicitly stipulate anything about it.	There is a significant gap. This aspect is missing in the Zambian laws.	The RAP should highlight the efforts of the project proponents about the improvement or restoration of the standards of living, income opportunities and

#	JICA GL and World Bank ESS5	Zambian Laws and Regulations	Gaps	Relocation Policy for this Project
				production levels to the pre-project levels.
5.	Compensation standards are disclosed and consistently applied. The project affected persons need to be aware of the compensation standards (JICAGL).	The EMA No. 12 of 2011 (Sections 29 & 31) and EIA Regulations, SI No. 3 of 2026, Regulation 5 provides for the consultation of stakeholders during the ESIA. The Access to Information Act No. 24 of 2023 (Sections 8 & 9) provides for access to information.	There is a significant gap. The Zambian laws listed left do not require that the compensation standards are disclosed and consistently applied nor the PAPs be aware of the compensation standards (JICAGL).	The project proponent should explain the compensation standards to the PAPs, which should be kept available consistently.
6.	In principle, the contents of the individual compensation to be agreed are explained to the project affected persons in writing, and the project affected persons can confirm the contents at any time (JICAGL).	The National Resettlement Policy 2024 and other Zambian environmental or social laws do not stipulate anything about it.	There is a significant gap. This aspect is missing in the Zambian laws.	The project proponent should show each PAPs the contents of the individual compensation. Based on that, both parties should agree on the compensation amount and payment schedule in writing.
7.	For projects that result in large-scale involuntary resettlement, a Resettlement Action Plans (RAP) must be prepared and made available to the public prior to the resettlement and provision of compensation and support (JICAGL).	The National Resettlement Policy 2024 nor other Zambian environmental or social laws do not stipulate anything about it though this policy defines RAP being “The document in which a developer / investor or other responsible entity specifies the procedures that it will follow and the actions that it will take to mitigate adverse effects, compensate losses, and provide development benefits to persons and communities affected by an investment project.”	There is a significant gap. This aspect is missing in the Zambian laws.	This Project will not result in a large-scale involuntary resettlement, but an RAP should be prepared and the compensation package and payment schedule should be agreed between the PAPs and the project proponent.
8.	In preparing the RAP, consultations must be held with the project affected people and communities, based on sufficient information made available to them in advance (JICAGL).	The National Resettlement Policy 2024 (Section 2, 3 and 4) recognizes vulnerable groups, but this policy nor other Zambian environmental or social laws do not stipulate anything about this consultation.	There is a significant gap. This aspect is missing in the Zambian laws.	The project proponent should hold sufficient consultations with the PAPs and communities in advance.
9.	When consultations are held, explanations must be given in languages and forms that are understandable to the project affected people (JICAGL).	The Access to Information Act No. 24 of 2023, EMA, EIA Regulations, National Resettlement Policy 2024 and other Zambian environmental or social laws do not stipulate anything about it.	There is a significant gap. This aspect is missing in the Zambian laws.	For consultations with PAPs, the project proponent should ensure a use of languages and forms that are understandable to the PAPs.
10.	Appropriate participation of the project affected people	The Environmental Management Act No. 12 of	There is a major gap. The Zambian laws	The RAP should ensure continuous

#	JICA GL and World Bank ESS5	Zambian Laws and Regulations	Gaps	Relocation Policy for this Project
	and their communities must be promoted in the planning, implementation and monitoring of measures against involuntary resettlement and loss of livelihood (JICAGL).	2011 (Sections 29 & 31); and Environmental Impact Assessment (EIA) Regulations (Statutory Instrument (SI) No. 3 of 2026), Regulations 7 and 8 requires public participation during the ESIA process. The Urban and Regional Planning Act No. 3 of 2015 (Section 21) provides for stakeholder engagement in planning processes.	indicated left provide for consultation mainly during the ESIA stage, but do not explicitly require participation of PAPs during implementation and monitoring of measures.	participation of PAPs at planning, implementation, and monitoring stages.
11.	A mechanism for handling concerns and grievances from people and communities affected by the project’s environmental and social impacts must be in place (JICAGL).	The Constitution of Zambia (Amendment) Act No. 2 of 2016 (Article 16(3)) provides for access to courts for redress. The EMA No. 12 of 2011 (Section 31) allows for public submissions and objections.	There is a major gap. The Zambian laws indicated left provide for formal grievance channels but do not establish project-level, accessible, and time-bound grievance redress mechanisms as required by JICA GL.	A project-level Grievance Redress Mechanism (GRM) should be established to address complaints in a timely, transparent, and accessible manner outside formal court systems.
12.	The borrower will, as part of the environmental and social assessment, conduct a census to identify the persons who will be affected by the project, to establish an inventory of land and assets to be affected, to determine who will be eligible for compensation and assistance, and to discourage ineligible persons, such as opportunistic settlers, from claiming benefits (ESS5 para 20).	The Environmental Management Act No. 12 of 2011 (Section 29) requires environmental and social impact assessments, including baseline data collection. The National Resettlement Policy 2024 provides for socio-economic surveys and identification of affected persons.	There is a major gap. The Zambian laws indicated left require baseline data collection, but do not explicitly mandate a detailed PAP census and cut-off date to prevent opportunistic settlement.	The RAP should include a detailed census, asset inventory, and establishment of a cut-off date in line with ESS5 requirements.
13.	Affected persons may be classified as persons: (a) Who have formal legal rights to land or assets. (b) Who do not have formal legal rights to land or assets, but have a claim to land or assets that is recognized or recognizable under national law; or (c) Who have no recognizable legal right or claim to the land or assets they occupy or use. (ESS5 para 10) The Borrower will offer affected persons compensation at replacement cost, and other assistance as may be necessary to help them improve or at least restore their standards of living or livelihoods, subject to the provisions of paragraph	The Lands Act Cap 184 (Sections 3 & 8) recognizes leasehold and customary tenure. The Constitution (Article 16) provides for compensation for property rights.	There is a major gap as the Sections 3 and 8 of the Lands Act recognize formal and customary tenure, but do not classify or provide for assistance to informal occupants without recognizable legal rights.	The RAP should ensure that all affected persons, including informal occupants, receive appropriate assistance in accordance with World Bank’s standards, which are indicated under the paragraph 10 and 12 of ESS5.

#	JICA GL and World Bank ESS5	Zambian Laws and Regulations	Gaps	Relocation Policy for this Project
	26 through 36 of the ESS (ESS5 para 12).			
14.	Where livelihoods of displaced persons are land-based, or where land is collectively owned, the Borrower will offer the displaced persons an option for replacement land in accordance with paragraph 35(a), unless it can be demonstrated to the Bank's satisfaction that equivalent replacement land is unavailable (ESS5 para 14).	The Land Acquisition Act Cap 189 (Sections 3 & 10) provides for compulsory acquisition and compensation, primarily in monetary terms.	There is a significant gap as the Zambian law listed left do not require provision of alternative land for livelihood restoration.	The RAP should assess the availability of replacement land for land compensation. If not possible, it should provide livelihood restoration measures and compensation at replacement cost.
15.	Transitional support will be provided as necessary to all economically displaced persons, based on a reasonable estimate of the time required to restore their income-earning capacity, production levels, and standards of living (ESS5 para 36)	No specific provision under the Land Acquisition Act Cap 189 of 1995 or other statutory laws for transitional support.	There is a significant gap. Zambian laws do not provide for transitional assistance such as moving allowances or temporary livelihood support for displaced persons.	The RAP should include transitional support measures (e.g., moving allowances temporary income support) based on the needs of affected persons.
16.	Particular attention will be paid to gender aspects and the needs of the poor and the vulnerable (ESS5 para 26).	The National Resettlement Policy 2024 identifies vulnerable groups and calls for their support. The EMA No. 12 of 2011 (Section 29) and the EIA regulations, 2026 requires consideration of social impacts.	There is a significant gap. Zambian laws do not prioritize vulnerable, poor or gender-related groups in land acquisition processes.	The project proponent should pay particular attention to gender aspects and the needs of the poor and the vulnerable.
17.	To address the issues identified in the environmental and social assessment, the Borrower will prepare a plan proportionate to the risks and impacts associated with the project (ESS5 para 21).	The EMA, EIA Regulations, nor National Resettlement Policy and other Zambian environmental or social laws do not stipulate anything about it.	There is a significant gap. This aspect is missing in the Zambian laws.	The project proponent should prepare a plan proportionate to the risks and impacts associated with the project.

(4) Land Acquisition and Resettlement Policy

Given the discrepancy between Zambia's current domestic laws and international initiatives regarding land acquisition and resettlement—including the JICA Environmental and Social Considerations Guidelines—this project will adopt the following policy.

The land acquisition and resettlement policy for this project aims to bridge the gap between domestic laws and the JICA Environmental and Social Considerations Guidelines (see "(3) Comparison of JICA GL and the Zambia's Legal System" above). Furthermore, regarding this discrepancy, we will explore practical methods that satisfy both sets of requirements.

In this project, we examined alternative options and significantly revised the project proposal from the initial design stage to avoid, minimize, mitigate, or alleviate resettlement, thereby reducing the number of households to be resettled by half compared to the initial plan. The City of Lusaka has agreed to provide adequate compensation and support to ensure that the livelihoods of households for which resettlement is unavoidable are improved or at least restored, and has calculated the compensation costs for land acquisition and resettlement.

Compensation and support will be provided to all affected persons as described below.

- Adverse effects on living standards.
- Adverse impacts on rights to housing, land use, and permanent and temporary rights to farmland, grazing land, commercial land, tenancies, annual or perennial crops, trees, and other real property.
- Income-generating opportunities, businesses, occupations, and places of business that are subject to temporary or permanent adverse impacts.
- Impacts on social and cultural activities and relationships.

In addition, the basic eligibility criteria for compensation are as follows:

- All affected persons shall be eligible for compensation and support, regardless of ownership status or social standing.
- All persons confirmed to have been residing, working, conducting business, or farming in the affected area at the time of the most recent census and asset survey shall be eligible for compensation and support.
- In cases where a person loses part of their assets, they shall be treated as eligible for relocation if the remaining assets are insufficient to sustain their livelihood thereafter.

The following policies regarding resettlement plans shall apply:

- Temporary impacts shall also be taken into account in the resettlement plan.
- Where impacts on the host community at the resettlement site are anticipated, the host community’s participation in the preparation of the resettlement plan and in decision-making must be ensured.
- The resettlement plan will be prepared in accordance with Zambia’s National Resettlement Policy 2024 and JICA’s Environmental and Social Considerations Guidelines. Furthermore, the resettlement plan will be translated into local languages and made publicly available to affected persons and other interested parties.
- Compensation under the resettlement plan will be provided based on the concept of replacement costs.
- Compensation for affected persons who depend on agricultural land will be provided on a land-based basis to the extent possible.
- Alternative land shall be of the same location and productivity as the land prior to resettlement.
- Resettlement assistance shall be provided not only for immediate losses but also during the transition period to restore the standard of living of those subject to resettlement. Such assistance may take the form of short-term employment, special allowances, income compensation, etc.
- The resettlement plan must be prepared with due consideration for the needs of those most vulnerable to the adverse impacts of resettlement. In addition, support must be provided to improve their socioeconomic circumstances. Vulnerable groups include the poor, those without land tenure, indigenous peoples, ethnic minorities, women, children, the elderly, and persons with disabilities.

- Those subject to relocation shall be enabled to participate in the preparation and implementation of the relocation plan through multiple rounds of stakeholder consultations.
- The views of those subject to relocation and their communities regarding the project, their rights, and mitigation measures for the adverse impacts under consideration shall be heard, and they shall participate in decision-making regarding relocation to the greatest extent possible.
- All costs necessary for land acquisition, including compensation and income recovery measures, shall be made available within the agreed implementation period. All costs necessary for relocation activities shall be borne by LWSC.
- Physical relocation will not be carried out prior to the provision of compensation and support necessary for relocation. Infrastructure at the relocation site will be fully developed prior to relocation. The acquisition of assets, payment of compensation, relocation, and the commencement of livelihood restoration activities will all be completed prior to construction, except in cases where expropriation has been ordered by a court. (Since livelihood restoration support is an ongoing activity, it must begin prior to relocation but does not need to be completed).
- An organizational and management structure for the effective preparation and implementation of the resettlement plan shall be established prior to the commencement of the resettlement process. This includes the human resources necessary to manage resident consultations, monitoring of land acquisition and livelihood restoration activities, and other related matters.
- Appropriate monitoring, evaluation, and reporting mechanisms shall be established as part of the resettlement management system.

Regarding the determination of the cut-off date for this project, the first stakeholder consultation was held on February 18, 2026. During this meeting, LWSC provided a project briefing to all affected parties, notified them that the cut-off date would be the following day, February 19, and designated that date as the start of the population census survey.

For information regarding land acquisition prices, reacquisition costs, and compensation amounts for the project, please refer to “(1) Overview of the Zambia’s Legal Framework for Land Acquisition and Resettlement” above.

3 Scale and Scope of Land Acquisition and Resettlement

The table below provides an overview of the scale and scope of land acquisition and resettlement for this project.

(1) Population Census

i. A population census survey was conducted among all occupants of the project site. In total, 67 PAPs were identified. The survey results have been summarized in the table below in accordance with the Guidelines for Preparing Category B Environmental and Social Considerations Reports (May 2023).

Table 4 Population Census Results

Type of loss	Number of HHs			Number of Persons		
	Legal	Informal	Total	Legal	Informal	Total
Required for displacement						
1 Structure owner on government land	0	58	58	0	58	58
2 Structure on private land	0	0	0	0	0	0
3 Tenants	0	0	0	0	0	0
4 CBEs (Structure owner on government land)	0	0	0	0	0	0
5 CBEs (Structure owner on private land)	0	0	0	0	0	0
6 CBEs (Tenants)	0	0	0	0	0	0
7 CBEs (Signposts, lawns, kerbs and driveways on government land)	6	0	6	6	0	6
8 Community owned structures	0	0	0	0	0	0
Not required for displacement						
9 Land owners	3	0	3	3	0	3
10 Lessees	0	0	0	0	0	0
Grand Total (1-10)	9	58	67	9	58	67

Note: HH stands for households and CBEs for commercial and business enterprises.

The aforementioned "CBEs (Signposts, lawns, curbs, and driveways on government land)" refer to signs, lawns, curbs, and driveways; however, for "Number of HHs" and "Number of Persons," each instance was counted as one household or one person. Regarding "Land owners" since the landowners (and related parties) do not reside on or near the relevant land, and there are no other occupants for other purposes, each case was counted as one household or one person.

ii. Regarding the determination of the cut-off date for this project, the first stakeholder meeting was held on February 18, 2026. At that meeting, LWSC provided a project briefing to all eligible individuals and announced that the cut-off date would be the following day, February 19, which was designated as the start date for the population census survey.

iii. The measures to be taken under this project to prevent new residents from moving into the project area after the cut-off date are as follows.

- The cut-off date was not only formally announced at the first stakeholder meeting, but approximately 20 explanatory notices were also posted at seven key locations within the project site on the same day (see figure below).

Figure 3 Location of the sign explaining the cut-off date (yellow pins)

Figure 4 Example of a notice explaining the cut-off date

- Evidence photos were taken of all 64 cases eligible for compensation, as an example is shown below.

Figure 5 Example of photographic evidence of the property eligible for compensation

- Subsequently, in the presence of the Zambian police and district council members, we obtained signatures from all the individuals confirming their agreement to the cut-off date and acknowledging their status as beneficiaries of compensation and recipients of restoration work.

(2) Asset and Land Survey

The land acquisition required for this project is approximately 68 hectares, and there are 67 project-affected persons (PAPs). The results of the land survey are summarized in the table below.

Table 5 Property and Land Survey Results (Land)

No.	Location	Land Use / Type	Affected area (m^2)	Total (m^2)
1	Lusaka District: One property.	Housing*	3,965	3,965
2		Farming	0	
3	Chilanga District: Two properties.	Housing	0	676,537
4		Commercial**	676,537	
			Total	680,502

Note*: It is categorized for housing, but not used for housing purposes. It is an abandoned land.
Note**: It is categorized under commercial, but no economic activity has been undertaken. It is an abandoned land.

The results of the property and land survey regarding the building are summarized in the table below.

Table 6 Survey Results for Real Estate (Buildings)

No.	Location	Type of Building	Sub-total	Total
Residential Building				
1	Lusaka District	No residential buildings.	0	0
2	Chilanga District	No residential buildings.	0	
Shops				
3	Lusaka District	No shops will be affected.	0	58
4	Chilanga District	Informal commercial structures (Street stalls)	58	
Public Institution				
6	Lusaka District	No public institutions.	0	0
7	Chilanga District	No public institutions.	0	
			Total	58

The block walls and other walls scheduled for demolition at the planned construction site for the elevated water tank in Garden Park, Lusaka, as well as their foundations, and the signs, markers, lawns, and curbs in the Chilanga district are not classified as buildings and are therefore not included in the breakdown in the table above.

With regard to crops, trees, livestock, and fish, since there were no livestock or fish that constituted property, the survey results for crops and trees are summarized in the table below.

Table 7 Survey Results for Agricultural Land (Crops, Trees, Livestock, and Fish)

No.	Location	Type of Plants	Quantity	Total
1	Lusaka District	None.	0	0
2	Chilanga District	Mango Tree	1	1
		Gauva tree	1	1
			Total	2

In this project, we planned to avoid farmland and other private land as much as possible when selecting the project site, and designed the route so that the water conveyance and distribution pipes would run along roads or riverbanks on state-owned land, thereby eliminating the need to cut down crops or trees. However, it is difficult to avoid cutting down the two trees mentioned above.

(3) Household and Living Conditions Survey

Most of the street stalls eligible for compensation have a floor area of between 2 and 6 square meters per stall. Their business activities include the sale of mobile phone-related products and other daily necessities, the provision of services such as bicycle repairs, and the sale of prepared food.

Since these are not residences, they are not organized by household; rather, each stall is typically operated by a single person. Although we were unable to obtain official or unofficial information regarding income from economic activities, given that most stalls occupy a very limited area and are constructed with materials such as corrugated iron roofs or other inexpensive materials of comparable quality, and based on estimates derived from the unit prices of the goods sold and services provided, it was assumed that the standard of living is not high.

Therefore, in addition to the replacement cost of the stalls, it is considered necessary to provide compensation for the period during which income cannot be earned or is reduced due to the construction work for this project (specific compensation details are discussed below).

(4) Socially Vulnerable Groups

Out of the 67 affected persons (PAPs), 58 are classified as socially vulnerable groups requiring special support (the poor and landless). These individuals operate street stalls without holding land rights. They will not lose the land itself and their business operations will be temporarily affected. This group includes 25 elderly people, women, and children, who are classified as being in a vulnerable position.

Although data on income and living standards was not available, field surveys indicate that these PAPs face socioeconomic constraints and may have limited capacity to cope with the impacts of the project.

Furthermore, 36 of the 67 PAPs rely on the affected shops as their primary source of livelihood. Of these, 22 are PAPs classified as being in a vulnerable position as mentioned above; since they are entirely dependent on sales from their shops, their vulnerability is considered to be compounded. Therefore, these PAPs face a high risk of losing their livelihoods, and targeted support is necessary to mitigate the adverse impacts. It is understood that the field survey did not include indigenous peoples, ethnic minorities, or other groups protected under domestic law; however, as mentioned earlier, in addition to the repurchase price, compensation is also necessary for livelihood reconstruction and living support during the period when income is lost or reduced due to the project's construction work.

4 Specific Measures for Compensation and Support

(1) Compensation for losses

In Zambia, it is mandatory for the Valuation and Assets Management Bureau of the Ministry of Infrastructure, Housing, and Urban Development—the competent authority—or a qualified valuation expert to calculate compensation for losses. For this project, the Valuation and Assets Management Bureau calculated the land acquisition costs, while a qualified valuation expert calculated compensation for street vendors and other affected parties. The results are shown in the table below.

Table 8 Compensation for Business Losses

#	Location	Resettlement / Land acquisition	Main Facility to be Affected	Acquisition Cost / Compensation (Kwacha)		
				Land	Plant	Structure and others*
1	Lusaka District	Land acquisition	Abandoned land	762,000	-	-
2	Chilanga District	Land acquisition	Abandoned land	13,400,000	-	-
3			Abandoned land	18,700,000	-	-
4		Temporal economic resettlement	Shop 1	-	-	43,000
5			Shop 2	-	-	1,300
6			Shop 3	-	-	6,000
7			Shop 4	-	-	2,500
8			Shop 5	-	-	2,500
9			Shop 6	-	-	1,700
10			Shop 7	-	-	4,000
11			Shop 8	-	-	6,500
12			Shop 9	-	-	8,500
13			Shop 10	-	-	2,000
14			Shop 11	-	-	2,000
15			Shop 12	-	-	5,000
16			Shop 13	-	-	3,000
17			Shop 14	-	-	3,500
18			Shop 15	-	-	4,300
19			Shop 16	-	-	1,500
20			Shop 17	-	-	1,000
21			Shop 18	-	-	3,500
22			Shop 19	-	-	800
23			Shop 20	-	-	800

#	Location	Resettlement / Land acquisition	Main Facility to be Affected	Acquisition Cost / Compensation (Kwacha)		
				Land	Plant	Structure and others*
24			Shop 21	-	-	1,200
25			Shop 22	-	-	1,000
26			Shop 23	-	-	900
27			Shop 24	-	-	10,000
28			Shop 25	-	-	8,500
29			Shop 26	-	-	7,500
30			Shop 27	-	-	16,800
31			Shop 28	-	-	2,500
32			Shop 29	-	-	2,000
33			Shop 30	-	-	2,500
34			Shop 31	-	-	1,500
35			Shop 32	-	-	15,000
36			Shop 33	-	-	1,200
37			Shop 34	-	-	2,500
38			Shop 35	-	-	3,000
39			Shop 36	-	-	1,000
40			Shop 37	-	-	700
41			Shop 38	-	-	2,000
42			Shop 39	-	-	2,700
43			Shop 40	-	-	2,500
44			Shop 41	-	-	2,000
45			Shop 42	-	-	1,300
46			Shop 43	-	-	4,500
47			Shop 44	-	-	3,000
48			Shop 45			6,500
49			Shop 46			3,000
50			Shop 47	-	-	2,500
51			Shop 48	-	-	1,700
52			Shop 49	-	-	1,500
53			Shop 50	-	-	1,800
54			Shop 51	-	-	1,500
55			Shop 52	-	-	1,400
56			Shop 53	-	-	1,300
57			Shop 54	-	-	3,000
58			Shop 55	-	-	6,000
59			Shop 56	-	-	2,000
60			Shop 57	-	-	1,500
61			Shop 58	-	-	900
62			Pavers, concrete filled metal drums, manhole outside residential property	-	-	65,000
63			Paved driveway, kerbs, lawn and signage of fuel service station 1	-	-	85,000
64			Paved driveway, kerbs, lawn and signage of fuel service station 2	-	-	100,000
65			Concrete and steel sign posts of school	-	-	5,800
66			Sign post and pavers	-	-	25,000
67			Concrete sign post	-	-	3,800
Subtotal in Zambian Kwacha				32,862,000	0	465,100
Total in Zambian Kwacha				33,327,100		
Total in Japanese Yen				282,004,202		

Note: The "others" marked with an asterisk (*) include signs, lawns, curbs, etc.

As mentioned earlier, the cut-off date for this project is February 19, 2026.

(2) Restoration of Livelihood

In addition to the replacement cost outlined in "(1) Compensation for Losses" above, it is desirable to provide compensation to socially vulnerable groups for living expenses and livelihood support during the period when they are unable to earn an income or experience a reduction in income due to the construction work for this project. In Zambia, there is no legal obligation for the project operator to provide such support. However, in light of the JICA Environmental and Social Considerations Guidelines, LWSC will provide the following support to all 58 beneficiaries who are socially vulnerable: adding a 15% living allowance to the replacement cost based on Zambia Institute of Valuation Surveyors (ZIVS) standards and including an amount equivalent to 30 days' worth of lost income (though actual loss is anticipated for less than one week) based on the following four tiers:

- Tier 1 (T1) — Subsistence Vending: Assessed at a baseline safety-net floor of ZMW 2,313.
- Tier 2 (T2) — Standard Retail / Telecom Booths: Adjusted by an equity factor of 1.25x against the baseline.
- Tier 3 (T3) — Established Roadside Units: Adjusted by an equity factor of 1.75x against the baseline to account for higher inventory volumes and logistics.
- Tier 4 (T4) — Commercial Complexes: Adjusted by business-appraisal scaling factors (2.5x to 3.5x) reflecting high-yield operations.

Table 9 Replacement Cost and Compensation Amounts for Reconstruction and Living Expenses

Location	Main Facility to be Affected	Compensation (Kwacha)		
		Structure and other assets*	Disturbance Allowance	Income Loss for 30 days
Chilanga District	Shop 1	43,000	6,450	8,096
	Shop 2	1,300	195	6,939
	Shop 3	6,000	900	2,313
	Shop 4	2,500	375	4,048
	Shop 5	2,500	375	2,891
	Shop 6	1,700	255	2,891
	Shop 7	4,000	600	2,313
	Shop 8	6,500	975	2,891
	Shop 9	8,500	1,275	4,048
	Shop 10	2,000	300	4,048
	Shop 11	2,000	300	2,313
	Shop 12	5,000	750	2,313
	Shop 13	3,000	450	2,891
	Shop 14	3,500	525	2,891
	Shop 15	4,300	645	2,891
	Shop 16	1,500	225	2,891
	Shop 17	1,000	150	2,313
	Shop 18	3,500	525	2,313
	Shop 19	800	120	2,313
	Shop 20	800	120	2,891
	Shop 21	1,200	180	2,313
	Shop 22	1,000	150	2,313
	Shop 23	900	135	2,313

Location	Main Facility to be Affected	Compensation (Kwacha)		
		Structure and other assets*	Disturbance Allowance	Income Loss for 30 days
	Shop 24	10,000	1,500	2,313
	Shop 25	8,500	1,275	2,313
	Shop 26	7,500	1,125	4,048
	Shop 27	16,800	2,520	4,048
	Shop 28	2,500	375	4,048
	Shop 29	2,000	300	5,783
	Shop 30	2,500	375	2,891
	Shop 31	1,500	225	2,313
	Shop 32	15,000	2,250	2,891
	Shop 33	1,200	180	2,313
	Shop 34	2,500	375	4,048
	Shop 35	3,000	450	2,313
	Shop 36	1,000	150	2,891
	Shop 37	700	105	2,891
	Shop 38	2,000	300	2,313
	Shop 39	2,700	405	2,313
	Shop 40	2,500	375	2,313
	Shop 41	2,000	300	2,891
	Shop 42	1,300	195	2,891
	Shop 43	4,500	675	2,313
	Shop 44	3,000	450	2,313
	Shop 45	6,500	975	2,891
	Shop 46	3,000	450	2,891
	Shop 47	2,500	375	4,048
	Shop 48	1,700	255	2,891
	Shop 49	1,500	225	2,891
	Shop 50	1,800	270	2,313
	Shop 51	1,500	225	2,313
	Shop 52	1,400	210	2,313
	Shop 53	1,300	195	2,313
	Shop 54	3,000	450	2,891
	Shop 55	6,000	900	4,048
	Shop 56	2,000	300	2,313
	Shop 57	1,500	225	2,313
	Shop 58	900	135	2,313
Total in Zambian Kwacha		233,800	35,070	171,162
Total in Japanese Yen		1,977,009	296,641	1,447,343

(3) Relocation Site (only if the relocation site is to be developed)

This project will not involve the physical relocation of residents. The street vendors eligible for compensation are informal residents who do not hold land ownership or usage rights; therefore, the compensation will consist of the aforementioned loss compensation, as well as support for rebuilding and sustaining their livelihoods. Regarding land acquisition that does not involve resettlement — which is classified as economic relocation—since there is no equivalent or better land available in the vicinity and the landowners wished to sell, LWSC will acquire the land through purchase based on estimates from the Ministry of Infrastructure, Housing, and Urban Development's Evaluation and Asset Management Bureau. Therefore, no relocation sites requiring development will arise in this project.

(4) Entitlement Matrix

The table below summarizes the types of losses, eligible recipients of compensation and support, the details of compensation, and the agencies responsible for compensation.

Table 10 Entitlement Matrix

#	Type of loss	Entitled Persons (Beneficiaries)	Entitlement (Compensation)	Implementation Issues / Guidelines	Responsible Organization
1	Loss of land by owner(s)	Legal titleholder owner(s) of land	Cash compensation at full replacement cost, based on evaluated and agreed market value (see Table 8 above)	1. Calculation of the land price by certified evaluator. 2. Agreement of the compensation between PAPs and the project proponent. 3. Compensation payment to the PAPs by project proponent. 4. Issuance of title deed.	LWSC supervised by Resettlement Department, Office of the Vice President (in coordination with Chilanga Town Council, Lusaka City Council, Valuation Department)
2	Loss of commercial assets by owner(s)	Legal titleholder owner(s) of commercial assets	Restoration of commercial assets(see Table 8 above)	1. Calculation of the cost for restoration of commercial assets (i.e. paved driveway, kerbs, lawn and signage post, etc) by certified evaluator. The valuation is based on current market rates without depreciation 2. Agreement about the temporal removal of the commercial assets and their restoration between PAPs and the project proponent. 3. Temporal removal of the above-mentioned commercial assets. 4. Underground burial of water pipes 5. Re-construction of the commercial assets	
3	Loss of commercial structure by unauthorized occupants	Informal business operators occupying public land (road reserve) without title	Cash compensation at full replacement cost (see Table 8 above)	1. Calculation of full replacement cost by certified evaluator. 2. Agreement of the compensation between PAPs and the project proponent. 3. Compensation payment to the PAPs by project proponent. 4. Temporal removal of the structures (kiosks, stalls, booths, workshops, etc.) 5. Underground burial of water pipes 6. Re-construction of the structures	
4	Loss of income and work days due to temporal displacement	Informal business operators occupying public land (road reserve) without title	Cash compensation for disturbance / lost income during construction work (see Table 9 above)		
5	Poor and vulnerable households.	Identified vulnerable PAPs (elderly, child-headed, female-headed households)			

5 Implementation Structure

The table below outlines the organizational structure for land acquisition and resettlement.

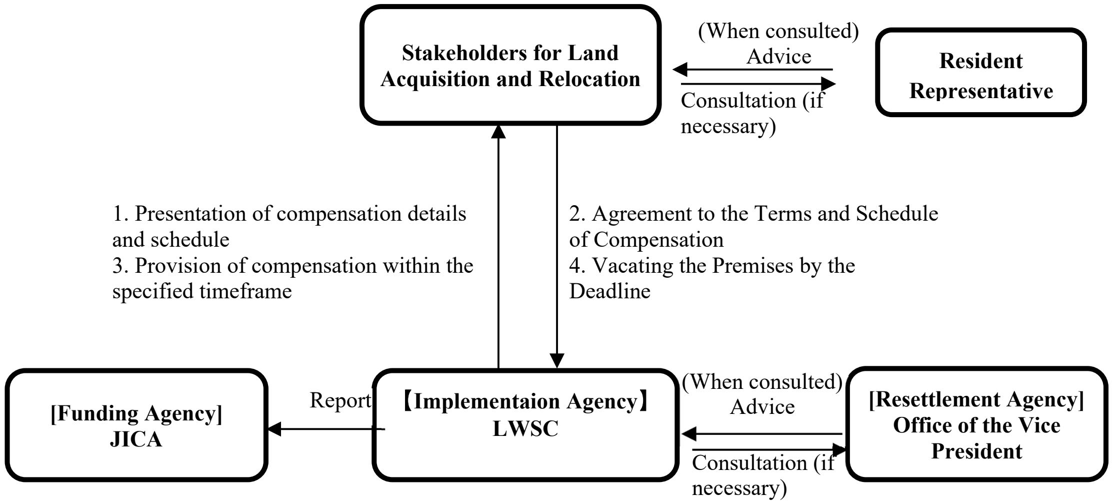

Figure 5 Organizational Structure for Land Acquisition and Resettlement

6 Implementation Schedule

The completed activities related to the land acquisition and resettlement are as follows.

- 18 February 2026: The first stakeholder meeting.
- 19 February 2026: Cut-off date and the starting date of the population census survey.
- 24 March 2026: The second stakeholder meeting.

The upcoming activities related to the land acquisition and resettlement are as follows.

- August 2026: Individual consultations with compensation recipients regarding compensation details.
- By October 2027: Completion of compensation payments to eligible parties
- December 2027: Contractor selection

7 Cost and Financial Resources

(1) Estimated Costs for Relocation Activities

- Compensation costs: A qualified appraiser has estimated approximately 440,000 Zambian kwacha (approximately 3.7 million yen) for 58 informal street vendors to cover the replacement cost of structures (including temporary relocation) and compensation for livelihood restoration and support.
- Land acquisition costs: The Valuation and Assets Management Bureau of the Ministry of Infrastructure, Housing, and Urban Development has estimated the cost of acquiring land (3,965 m²) in the water supply area of Lusaka District at 762,000 Zambian kwacha (approximately 6.4 million yen). Currently, LWSC has requested an estimate for land acquisition costs (676,537 m²)

in the production well area of Chilanga District from the Valuation and Assets Management Bureau of the Ministry of Infrastructure, Housing, and Urban Development, and is awaiting the results.

(2) Financing Sources for Relocation Costs

LWSC has explained that the funds for relocation costs will not come from LWSC's regular budget, but rather from a special budget provided by the Ministry of Water Development and Sanitation (MWDS) specifically for this project.

Zambia's fiscal year runs from January to December, and budget requests are typically submitted around June to July each year. Since the contractor agreement for this project is scheduled for December 2027, compensation and land acquisition must be completed by that time; therefore, funding for relocation costs must be secured in the 2027 fiscal year budget. Consequently, MWDS and LWSC must submit their budget requests without delay in June–July 2026.

Regarding the items to be borne by the other party, LWSC has reportedly already shared an overview with MWDS and obtained their consent; however, LWSC plans to formally submit a request letter to MWDS.

8 Monitoring System and Monitoring Forms Used by the Implementing Agency

The monitoring items for resettlement will be the approval of the budget by LWSC, the status of compensation payments, and the completion of resettlement. Since this project involves no physical resettlement and only limited economic resettlement, the establishment of an external monitoring group for this project will not be considered.

It is assumed that LWSC, as the implementing agency, will provide compensation, and that the consultant will conduct monitoring during the detailed design phase. Monitoring will be carried out in accordance with the contents described in "Draft Monitoring Form" below.

To ensure that compensation is carried out reliably and to enable displaced residents to participate in the monitoring process, LWSC and the displaced residents will confirm progress on three occasions corresponding to key milestones: the scheduled date of budget approval by LWSC, the deadline for compensation payments, and the scheduled date of relocation completion. Monitoring items, timing, indicators, and implementing agencies related to land acquisition and resettlement will be organized in the draft monitoring form.

9 Stakeholder Consultation

Details regarding the announcement, date, time, location, and method (resident meetings, individual interviews, languages, etc.) of the stakeholder consultations were outlined in the section above titled “Consultations with Local Stakeholders.” As supplementary information, we took care to ensure that, in addition to announcements via radio and newspapers, we distributed invitation letters for resident consultations in advance to affected individuals who are socially vulnerable, and made individual visits after the consultations.

During the Q&A session of the first stakeholder consultation, 18 questions and comments were raised. While the majority were not questions but rather expressions of gratitude or impressions regarding the project, or comments unrelated to the project, there were no objections to the project itself or to the compensation policy for affected parties regarding land acquisition and resettlement. Of the 18 items, five were questions regarding the project in general and land acquisition and resettlement; the Q&A for these is summarized in the table below.

Table 11 Q&A from the First Stakeholder Consultation

No.	Questions from participants	LWSC's response
1	What is the implementation timeline for the project and the expected duration before completion	The installation of pipelines and associated infrastructure within the community is scheduled to take place from late 2027 until 2030.
2	Has the land for the water storage tanks already been secured ? How are the plans to purchase them in the future ?	The land parcels for the water storage tanks are not yet secured, but the negotiations are ongoing between the land owner and LWSC in the interest of community benefit.
3	Would the planned infrastructure for the area be limited to storage tanks? Or is there a possibility of installing a community borehole?	For the area in question, the project will involve the installation of storage tanks only. However, there are other ongoing initiatives, led by Disaster Management and Mitigation Unit and the Water Development sector, which involve the construction of boreholes in the community.
4	Will LWSC engage the Council, through the Engineering Department, to obtain the necessary permits for any excavation work, during project implementation? This is to ensure that existing facilities are not negatively affected and that any roads crossed during construction are restored to proper bitumen standards.	This meeting provides LWSC and the Council with an opportunity to begin coordinating and working together ahead of project implementation in order to respond to your request.
5	What measures would be taken in cases where houses or other properties are located close to the proposed pipeline alignment approximately two metres away and whether this would result in demolition and compensation?	The proposed water pipeline will be aligned alongside the tarred road, within the road reserve, which falls under the jurisdiction of the local authority. No private individuals legally own land within this road reserve. However, there may be a few small, informal trading structures present. Detailed evaluation studies will be conducted by certified experts to assess the existing conditions along the route. A formal cut-off date as of tomorrow will be established to document and verify all structures present within the road reserve at the time of assessment. Any structures erected after this cut-off date will not be considered for other forms of compensation.

As noted above, none of the questions or comments raised during the first stakeholder consultation were deemed worthy of inclusion in the relocation plan.

Next, during the Q&A session of the second stakeholder consultation, seven questions and comments were raised. While there were no objections to the project itself or to the compensation policy for affected parties regarding land acquisition and resettlement, all seven items included questions about the project in general and regarding land acquisition and resettlement; therefore, the Q&A is summarized in the table below.

Table 12 Q&A from the Second Stakeholder Consultation

No.	Questions and comments from participants	LWSC's response
1	Would this public disclosure meeting be the final stakeholder consultation prior to the implementation of the project?	As part of the ESIA process, two public consultation meetings are legally required: the initial scoping meeting, which has already been conducted, and the public disclosure meeting, which serves as the final formal consultation. However, this does not mark the end of community engagement, as there will be ongoing interactions and meetings with the community as the project progresses.
	How is the progress made in securing the land for the placement of the proposed water tanks?	Regarding the acquisition of land, there are two separate parcels involved: one for the boreholes and another for the placement of the water tanks. Both parcels are currently in the process of being acquired, with ongoing discussions aimed at finalizing the purchase agreements.
2	According to regulatory requirements, water sources should be located at least 30 metres away from potential sources of contamination.	Appreciation as given for the valuable comments.
3	Will households requiring a connection need to formally apply to LWSC once the water tanks are installed? Or Will LWSC automatically connect all houses to the system?	Households will be required to formally apply for connection. LWSC will then assess each application, taking into account factors such as the accessibility of the property, the condition of the roads, and the feasibility of extending pipelines to the household. There will be a cost associated with the connection, as the service will not be provided free of charge.
4	Will alternative options, such as the installation of water kiosks, be considered, which are generally more affordable than individual household connections?	The provision of water kiosks will form part of the project to cater for those who may not be able to afford individual household connections. However, households wishing to have water connected directly to their homes will be required to apply and pay the applicable connection fees.
5	It is important to note that the road reserve for the M9 Road is 60 meters. LWSC should liaise with the Lusaka Regional Office of Road Development Agency to obtain clarification and ensure compliance with all relevant requirements if no engagement has yet been undertaken.	Appreciation as given for the valuable comments.
6	Projects involving excavation across roads often encounter challenges in restoring affected sections to their original condition. The Road Development Agency (RDA) should ensure that all roads impacted by construction activities are fully reinstated to their original state.	One of the reasons ZEMA is interested in such matters is to help address and resolve the issues being raised.
7	How will the grievance redress	From the EIA perspective, the proposed approach for implementing the

No.	Questions and comments from participants	LWSC's response
	mechanism (GRM) be implemented within this project?	GRM involves several steps. Firstly, suggestion boxes will be placed at the currently identified locations to collect feedback and concerns. Additionally, the project team is engaging local leaders to explore other effective channels for receiving community input. The project has already collaborated with local leadership structures, including the Ward Development Committee, who have been instrumental in facilitating meetings and community engagement. Through these established channels and ongoing interactions, the project will maintain an open line of communication, ensuring that grievances are received, addressed, and feedback is provided to the community.

As noted above, while none of the questions or comments raised during the second stakeholder consultation were deemed necessary to incorporate into the relocation plan, there were opinions that should be appropriately reflected in the project plan or the Environmental and Social Impact Assessment Report. These are summarized below.

- Comment/Point 1: The water source must be located at least 30 meters away from any potential sources of contamination.

- This point has been taken into account in the project plan, and land acquisition has already been planned.

- Water kiosks are appreciated because they generally reduce costs compared to individual connections to each household.

- The installation of water kiosks is planned in the project plan.

- Note that the road reserve for M9 Road (where buried piping is planned for this project) is 60 meters. If you have not yet contacted the Road Development Authority’s Lusaka Regional Office, you should consult with them regarding excavation and the use of the road reserve.

- We have been in continuous consultation with the Road Development Authority’s Lusaka Regional Office since the inception of the project, and no issues have been identified regarding information sharing or compliance with regulations.

- For projects involving road excavation work, it is necessary to fully restore all roads affected by construction work to their original condition.

- The Environmental Management Plan in the Environmental and Social Impact Assessment (ESIA) Report clearly states the project operator’s obligation to restore roads and other infrastructure to their original condition, and the operator is legally obligated to comply with the ESIA Report. Furthermore, monitoring compliance with these requirements is explicitly defined as the operator’s responsibility in the ESIA Report.

- It is necessary to establish and implement a Grievance Redress Mechanism (GRM) for the project.

- The Environmental and Social Impact Assessment Report establishes a grievance resolution mechanism and clearly stipulates the operator’s obligation to address complaints; the operator is legally obligated to comply with the Environmental and Social Impact Assessment Report. Furthermore, monitoring compliance with these provisions is explicitly stated as the operator's responsibility in the Environmental and Social Impact Assessment Report.

The second stakeholder consultation mentioned above will be the final consultation for this project, and no further resident consultations are scheduled.