

Lebanon
Cultural Heritage and Urban Development Project
Resettlement Policy Framework
(December 23, 2002)

A. INTRODUCTION

1. This Resettlement Policy Framework (RPF) lays out the resettlement principles, organizational arrangements and design criteria for subprojects that the Government of Lebanon will apply during the implementation of Lebanon's Cultural Heritage and Urban Development Project (CHUD) with financial support from the World Bank. This framework applies to any aspect of the project that require expropriation of private land or assets in the public interest, or that requires the involuntary removal of residences or economic activities. Based on Lebanon's law of expropriation, it describes how the Government of Lebanon will identify, mitigate and compensate any adverse impacts on the assets and livelihoods of the people directly affected by such expropriations. It has been drafted in the context of the preparatory phase of the CHUD and may be revised during project appraisal.

2. The object of the RPF is to ensure that throughout its life, the project fully complies with the principle that any negative impact associated with involuntary loss of assets or relocation of economic activities or residence is minimized and that appropriate protection is provided to the interests of the poor, vulnerable and those without legal title. It lays out the procedures for prior consultation with all affected persons¹, the assessment of losses and entitlements, handling complaints and disputes, and monitoring the outcomes. Finally, it describes the mechanisms to ensure that that outcomes conform to the principles of full and prior compensation for any lost assets and full restoration of standards of living that are directly and adversely affected.

3. In a decentralized project of this nature, the numbers and locations of persons to be displaced and the arrangements for their relocation cannot be determined at this time. The RPF is therefore the instrument that sets out procedures for screening subprojects and where so required, guides the preparation of individual site-specific Resettlement Action Plans (RAPs) or abbreviated RAPs acceptable to the Bank that CDR will submit as and when the project conditions so require. The policy framework guides the degree of detail required and the process for the preparation, approval, implementation, monitoring and evaluation of the RAPs. The RPF will thus ensure that the project fully complies with the Bank's safeguard policy on involuntary resettlement (OP 4.12).

4. The application of the RPF is the responsibility of the Council for Development and Reconstruction (CDR) which will ensure that participating institutions, including the municipalities, the Directorate General of Urban Planning and the Department of Antiquities are adequately informed and equipped. CDR will monitor and report on the progress of the involuntary resettlement activities. CDR's specific role will be specified in the Project Implementation Plan and the Legal Agreement.

¹ For the purposes of this framework, "affected persons" are defined as all persons who, as a result of works carried out or to be carried out under the Project, would incur involuntary loss, temporarily or permanently, of land, shelter, productive assets or access to productive assets, or of income or means of livelihood and, as a consequence, would have their living standards or production levels adversely affected.

B. PROJECT OBJECTIVES AND DESCRIPTION

5. The Lebanon CHUD Project aims to improve the conservation of Lebanon's material cultural heritage and to enhance its contribution to local development and urban life. The project has four main components located in the five cities of Baalbeck, Byblos, Saïda, Tripoli and Tyre: (i) the conservation and management of archeological sites, especially the World Heritage sites of Baalbeck, Tyre and Byblos (ii) the rehabilitation of historic city centers, including substantially rehabilitating the medinas of Tripoli, Tyre and Saïda (iii) the improvement of urban infrastructure and (iv) the strengthening of institutions, i.e., the Ministry of Culture, Ministry of Tourism, municipal management of historic city centers and the CDR. In implementing the project, the CDR will closely coordinate with the Ministry of Culture, the Directorate General of Archeology (DGA), the Directorate General of Urban Planning (DGU).

6. The project has the potential to bring substantial socioeconomic benefits to Lebanese society as a whole, to the municipalities concerned, and in particular to the poor populations living in these municipalities. A detailed socioeconomic survey and stakeholder analysis have been prepared for the five cities. While every effort has been made to minimize displacement and to upgrade the areas with the populations *in situ*, some displacement cannot be avoided, especially where the integrity of the site or technical requirements apply. In particular, interventions to improve urban infrastructure and those to rehabilitate historic city centers, especially that of housing clusters and public spaces, may require involuntary resettlement of people and businesses or their temporary displacement. These are almost all small in scale, and all will be dealt with as development interventions.

7. The following subprojects will or may require involuntary resettlement:

- Rehabilitation of the medinas of Tripoli, Tyre and Saïda (especially the rehabilitation of public spaces and housing clusters, such as the Khan Al-Askar)
- Urban infrastructure improvements to manage vehicular access to historic centers, construction of parking and commercial facilities in Baalbeck, Byblos, Saïda, Tripoli and Tyre;
- The archeological site renovation in Tyre includes the removal and relocation of an illegal construction that is infringing on the site

8. In the case of Tripoli medina, the rehabilitation of the Khan El Askar will require involuntary settlement of up to 60 families. The municipality gave to families who lost their homes in the disastrous 1958 Abu Ali floods temporary shelter in the Khan pending provision of permanent replacement housing, which it never managed to secure. The project provides the municipality with means to fulfill its long standing intention to rehouse the very poor families and businesses in modern affordable social housing immediately nearby, in place of their currently dilapidated and inappropriate lodgings. This will enable the Khan, a building of considerable historical value and intrinsic aesthetic worth, to be converted into a local visitor and commercial center as part of the economic and physical rehabilitation of the medina. Phase I of this sub-project is described in a RAP prepared concurrently with this policy framework.

9. With one possible exception, all other resettlement under this project are expected to be much smaller in scale than that in Tripoli. They would be required for technical reasons of planning or infrastructural design, or during the renovation of public buildings.

C. INSTITUTIONAL AND LEGAL FRAMEWORK

10. Lebanon's legislation provides the legal framework for the implementation of the entire CHUD project and its related sub-projects. It provides for expropriation only by due legal process and after compensation has been paid for all tangible losses of property and economic prejudice at current market rates or better; and it provides for a mechanism of appeal and review. The principal legal and institutional arrangements are as follows:

11. *Expropriation:* Lebanese law protects the right of private property, including land. Law No. 58 enacted in 1991 authorizes the expropriation of private property in the public interest but only after fair compensation has been made. The compensation is determined through an assessment by an independent judicial committee and is always a monetary award, comprising two components: (i) indemnification of damage or loss to improvements (buildings, trees, fences etc) and (ii) compensation for the value of the land. Under Lebanese Law, the expropriation is considered final unless the public interest claim is itself challenged by an individual directly affected (an association, municipality, NGO etc does not have the right to appeal).

12. There are detailed procedures for expropriation (Fig. 1). A decree is published in the *Journal Officiel* (Government Official Gazette) announcing and authorizing the expropriation with a timeline which should not exceed 8 years from the publication of the announcement. Annexed to the decree are the following: a) a sketch of the entire project area proposed; b) a detailed plan of the properties to be expropriated; c) a list showing the registration numbers of each property, its location, the names of all the owners and right holders in the Land Registry; and d) a detailed list of the immovable contents of the property as well as a detailed plan of buildings constructed prior to the date of the decree's publication. The complete document is made available for public access at the government offices. In addition, these documents are posted at the municipalities where the properties to be expropriated are located.

13. *Compensation:* Compensation is determined by an Expropriation Commission set up by a decree in accordance with proposals from the relevant ministers for each Mouhafaza. The members of the commission consist of (i) a chairperson (a judge or a magistrate of at least the 10th degree) (ii) an engineer and (iii) a property valuator. The higher appeals level of commission consists of a chairperson (a magistrate of at least the 6th degree) (ii) an engineer and (iii) an expert in land law and valuation. Each commission is assigned alternates for each of its members, as well as a clerk and a messenger.

14. The Expropriation Commission determines all compensation for any economic prejudice arising from expropriation, decides on requests by owners for total expropriation and full compensation, determines the value of small portions of land which cannot be used for building and resolves disputes over the division of compensation between shareholders. Its awards are always based on prevailing local market rates.

15. The Expropriating Agencies for the CHUD will be the Directorate-General of Antiquities (DGA) and the five municipalities concerned, with the support of the CDR. These are represented before the commissions by legally qualified representatives, and individual landowners may either represent themselves or be represented by a lawyer. The primary role of the Expropriation Unit at the CDR in relation to this project will be to provide technical assistance to the expropriating agencies, to ensure that they undertake their tasks in accordance with the law of Lebanon and the provisions of this policy, and to monitor and evaluate the outcomes.

16. *Land Tenure:* In Lebanon there is generally little contestation over ownership, legal rights or boundaries of land because plots are generally well surveyed and title is recorded at an administrative service based in the Ministry of Finance (with the exception of areas affected by uncontrolled movement and settlement due to the civil war). The survey unit also maintains cadastral maps that are regularly updated. Since land ownership is recorded in shares, along with all those who ever held title to it, the exact value of any transaction for an individual owner can be determined. In addition, land laws in Lebanon are gender neutral. However, the situation with regard to historic urban cores is much less clear, with informal land subdivisions not represented in the cadastre, and complex vertical layers that do not always correspond to horizontal boundaries. These features reinforce the need in this project to conduct careful and detailed empirical research in the affected areas, consultation, and to tailor the project actions to the social realities on the ground.

17. *Tenancy Laws:* A new rent law enacted in 1991 relaxed rent control and gave the landlord the right to repossess the property at the end of the contract. Rent laws prior to 1992, however, permitted tenants automatically to renew their contracts and capped rent increases. Moreover, tenants could sublease the property to third parties with only minor increases in the rent at the signing of each new contract. As a result, rent contracts signed after 1991 favor the landlord and those signed previously favor the tenant. Where expropriation causes loss of tenancy, expropriation commissions divide their awards between landlords and tenants according to the economic value of the tenancy, enabling tenants to secure alternative housing by rental or down payment against purchase. (See also Section H below on Monitoring and Evaluation).

18. *Antiquities Laws:* According to the Antiquities Law of 1933 historic monuments, even those on the General Inventory List, can be either publicly or privately owned. Although archaeological finds are considered state property, the parcels on which archaeological discoveries are made can remain the property of private individuals or institutions. Under this law, private property owners of listed historical buildings are responsible for the repair and maintenance of the structure. The discovery of important archaeological remains could also lead to the expropriation of private property or to limitations on its use. If a building is placed on the list of classified monuments, the owner receives no compensation for the freezing of development rights. However, if the listing is erroneous the owner may eventually be compensated.

19. *Maritime Public Domain.* Lebanese Law provides that the entire intertidal shore is public domain. This law has not been fully enforced. In some places, such as at Tyre, a small number of semi-permanent informal business structures have been erected that are inconsistent with the World Heritage character of the site. The owners will be assisted to relocate their businesses to a more suitable site.

20. Lebanese law is fully consistent with the principles of the Bank's OP/BP 4.12 on involuntary resettlement and provides for legal process: i) expropriation is effected after compensation has been determined ii) prior warning and public disclosure is made iii) full judicial compensation is independently awarded and iv) citizens have the right to appeal. There are however, several sequencing features of Lebanese procedures which are commonly encountered in many countries that differ slightly from what the Bank documents anticipate. Expropriation is initiated by a ministerial decree and signed by the President with no prior public debate. However, informal public consultations may precede the decree and this has been the case in medinas and detailed specificity about expropriations would not be appropriate to Lebanese conditions. The compensation levels made through an independent judicial process are situation specific and cannot be known at the time of the RAP but may in some cases be estimated on the basis of known precedent.

21. The Lebanese law of expropriation only compensates those with legal rights. However, mechanisms exist that protect various forms of customary rights made on a case by case basis to the expropriation commission. In practice, since squatters cannot be evicted without an order from the governor, resettlement is most often done through amicable negotiation, by agreeing on a level of compensation or inducement that will encourage voluntary departure. Widespread displacement of people during the civil war led to a proliferation of squatting between 1975 and 1991. As part of the reconciliation process a Displaced Peoples Fund (DPF) was established to encourage squatters to return to their villages. However, since many did not wish to return to their respective villages, the DPF provides them with financial support to relocate wherever they choose. This project will follow Lebanese practice of humane treatment and amicable resolution of cases to avoid hardship where poor residents lack formal legal rights.

D. PLANNING PROCEDURES AND IDENTIFICATION OF IMPACTS

22. When a sub-project is first identified, the CDR² will prepare a site-specific Land Acquisition Plan which is a pre-feasibility diagnostic tool that predicts the project's social impact from land acquisition or land use conversion (or restoration). The LAP specifies what land is needed and why, describe what portion of it will be obtained through expropriations and assesses the potential involuntary resettlement impacts. The LAP will be based on a prefeasibility technical study which surveys existing structures and uses of the land that would be directly affected by the works.. A rapid social appraisal including a site visit should also be undertaken by a social scientist to screen for any resettlement issues, such as whether any persons would be affected, how and how many. CDR will also conduct initial public consultations to evaluate whether this will be a simple or difficult resettlement issue (do people want to move or not? Etc). These consultations are distinct from those to be held during the social assessment.

23. CDR will submit the LAP to the Bank In the event that the proposed sub-project entails no disturbance or any expropriation of occupied or private land, this information shall be officially recorded as a no-objection by the Bank. Otherwise the Bank will advise whether or not the proposed sub-project and the costs associated with implementing the LAP can be financed under the loan (The Bank will not cover the direct costs of purchasing land or any other cash benefits). After receipt of the LAP, the Bank will advise the CDR whether a full or abbreviated Resettlement Action Plan should be prepared and whether or not other remedial actions need to be taken. If a full RAP is required, CDR will arrange for a census, consultations and appropriate Social Assessment with TORs agreed by the Bank. If an Abbreviated RAP is required, only a census and consultations with the affected population are required. No Social Assessments are required, in an Abbreviated RAP although the CDR will have to provide evidence to the Bank of adequate compensation having been made.

24. **Procedures for consultation:** The concerned municipalities should consult with tenants associations, municipalities, NGOs focusing on Preservation of Cultural Heritage and environment. The consultation process should also be a means for establishing dialogue not only with the stakeholders, but also among them.

25. **Census:** As soon as possible after the expropriation site has been determined, the concerned municipalities will conduct a nominative census to identify the persons who will be affected by the project in order to establish who will be eligible for assistance and to discourage the arrival of new people in search of assistance.

26. **Abbreviated Resettlement Plan Procedures.** Some subproject components in this CHUD may only require expropriation of land or assets affecting a small number of people (i.e. less than 200) with relatively minor impacts (e.g., not requiring changes in occupation or relocation of residence). Under such circumstances, an Abbreviated Resettlement Plan will be prepared for each sub-project. Without repeating information in the policy framework, the Abbreviated Resettlement Plan should briefly present the following:

- the project activity requiring the acquisition of land or other assets, and the nature and extent of that acquisition, including sketch maps, photographs, cadastral surveys etc.
- an officially certified census households and dependants affected , classified by status (property owners, tenants-at-will, tenants and other occupants); and an inventory of impacts for each category of persons; a reference of where the results of this census are kept.
- an unofficial detailed estimate of compensations expected and verification that resources for compensations are available;

² In this paragraph and elsewhere, unless the context forbids it, CDR may assist the expropriating agency, ministry, municipality or consultant to undertake this work, but has responsibility for the document it submits to the Bank.

- description of measures to protect the interests of low-income tenants of rehabilitated buildings;
- the timetable and budget for implementation of the resettlement plan;
- institutional responsibility and financial arrangements for implementation;
- the consultation arrangements on acceptable alternatives and the grievance procedures open to project-affected persons; mechanisms for informing the public (such as information campaigns) to inform the community on the project and subproject;
- arrangements for monitoring and evaluation of the implementation (including measurement of real estate markets before and after project implementation to monitor the real estate market and assess its impacts on poor tenants of rehabilitated buildings)

27. This plan (excluding the amounts of monetary awards) shall be made publicly available in Arabic and French and shall be approved by the Bank prior to the implementation of the resettlement activities.

28. **Full Resettlement Action Plan (RAP) Procedures.** In the event that any project activity will affect more than 200 persons or where impacts are not minor the Government will prepare and submit to the Bank a full Resettlement Action Plan for each individual sub-project. The CDR is responsible for the Social Assessments which will be conducted by a qualified social scientist. The TORs will be prepared by the CDR with oversight from the Bank. The full RAP comprises all the elements of the Abbreviated Resettlement Action Plan, but also includes the findings of a social assessment that examines the nature of the impacts, the socio-economic and cultural setting, local organizations, and social risks. The social assessment should also list the indicators which would show that displaced populations would maintain and preferably improve their former quality of life. If the project activity includes the economic rehabilitation of affected persons, a detailed analysis of the arrangements (e.g., land redistribution, provision of employment, or other alternative measures to restore incomes) must be submitted to the Bank for review. The additional elements of a full RAP include the following:

- Description of affected communities including their socio-economic characteristics; their history in the neighborhood and sense of connectedness to it; distinguishing characteristics of the community; a census of the inhabitants (owners, tenants with or without contracts and illegal occupants); any issues of potential conflict should also be signaled.
- An analysis of property ownership and occupancy by type, and of the expected impact of relocation on standard of living. Particular attention should be paid to the operation of the rent laws;
 - Description of the consultative procedures with the displaced (see details in next section). These
 - inform them about their options and rights
 - offer choices of technically and economically feasible resettlement options
 - enable them to propose suggestions for their resettlement
 - propose mechanisms for compensating them for their losses directly linked to the project
- Statement of objectives of the resettlement program: counter-risk and safeguard provisions. This includes:
 - a discussion of how the displaced people will maintain or upgrade their living standards
 - the provision of services which facilitate relocation
 - services offered after relocation (e.g. employment, running water, housing, transportation etc) based on an assessment of their needs
- Site selection for new settlement together with relocation risks and reconstruction.

E. DISCLOSURE AND GRIEVANCE PROCEDURES

29. **Disclosure and Consultations:** The RAP or Abbreviated RAP (excluding individual names and the amounts of monetary awards) shall be made publicly available in appropriate Arabic and French versions and shall be approved by the Bank prior to the implementation of the resettlement activities. Acquisition of land or other assets, and the preparation of resettlement plans, require consultation with the project-affected population. In addition to residents and business owners affected, consultations with associations, NGOs and other representatives of civil society within the affected zone should be carried out. The purpose of these consultations is to also generate partnerships and cooperative engagement among those affected. Many of the old Medinas are inhabited by poor migrants. Following consultations, any remedial plans (e.g. abbreviated RAP; full RAP) will be disseminated to the project-affected persons in a manner accessible to them. Information disseminated to the project-affected persons will include: (i) compensation rates for all categories of affected assets; (ii) eligibility criteria for all other forms of assistance that may be provided; and (iii) grievance procedures. The resettlement and environment consultation and disclosure requirements will also be harmonized and streamlined as appropriate.

30. **Grievance Procedures.** The decisions of the Expropriation Commission can be appealed to an Appeals Commission by either the concerned Expropriating Agency (DGA or concerned municipality) or the individual rightholder (but not a corporate entity such as an NGO, municipality etc). The decision of the Appeals Commission is binding and final. Appeals Commissions may make upward or downward adjustments in the level of compensation awarded and have no time limits to reach their decision. Irrespective of who appeals (CDR or owner), the owner is required to vacate the property, with rights of sale but not of development, and with access to 75 percent of the compensation until the Appeals Commission reaches its final decision.

31. If project affected persons are dissatisfied with the proposed resettlement arrangements or with the actual resettlement implementation, they can address their concerns first to the expropriating authority through channels that will be provided in the RAP. If this does not result in a satisfactory resolution, project affected persons may take their grievances further and in writing to both the concerned Expropriating Agency and to CDR in its capacity as the "owner" of the project. CDR has established procedures to assist expropriated persons with the collection of compensation and other matters in respect of implementation. If the grievances cannot be resolved through administrative action, project-affected persons may initiate legal proceedings in accordance with Lebanese laws.

F. INSTITUTIONAL AND IMPLEMENTATION PROCESS

32. The expropriating agencies (DGA and the municipalities concerned) are responsible for implementing the resettlement program in accordance with the RAPs and for ensuring the compliance with the provisions of the RAPs by the second level of implementation that consists of site supervisors, contractors (consulting firms, building contractors etc) employed for specific contractual tasks. If the resettlement activities involve extensive assistance to the affected population, in the form of services etc, the CDR, in partnership with the municipalities and the Ministry of Displaced, may provide additional support under the project to these activities.

33. The CDR is responsible for preparing the RAPs in close consultation with the expropriating agencies, for transmitting them to the Bank for approval, and for oversight and monitoring of their implementation.

G. FINANCIAL COSTS

34. The Government of Lebanon will finance all the costs of compensation in relation to land acquisition and resettlement grants. The IBRD loan may be used to cover all other costs linked to resettlement, such as housing costs, technical assistance, monitoring.

H. MONITORING AND EVALUATION

35. The CDR is responsible for coordinating monitoring and evaluation of the resettlement program. Based on the degree of the complexity of the Resettlement Action Plan, several agencies may also be involved in this process. The Project's Procedures Manual will spell out the RAP monitoring arrangements; more specifically, it will lay down the performance indicators which will be used to monitor this part of the project and the procedures to be used. The impact of increased urban investment on poor residents of the old city centers needs to be regularly monitored in order to evaluate whether any supportive measures are needed. Bank supervision missions which include a qualified social scientist are also a key aspect of monitoring and evaluation.

36. The RAP monitoring indicators will be simple but robust indicators or proxies that should be as far as possible visible and verifiable and that will, according to the nature of the impacts, measure the following key outcomes against the pre-resettlement baseline:

- For owners and tenants physically relocated: (i) value, type and key characteristics of the residential accommodation; (ii) its location in relation to the employment and earning requirements of the occupant; and accessibility of key services and amenities for family members (including women, children, the elderly and youth); (iii) key measure (or proxy) of household expenditure-income balance.
- For owners of businesses physically relocated: nature of business; location in relation to clientele, suppliers and outlets; turnover.
- For owners of residential or business properties that are restructured or partially relocated or whose status or tenure is changed.

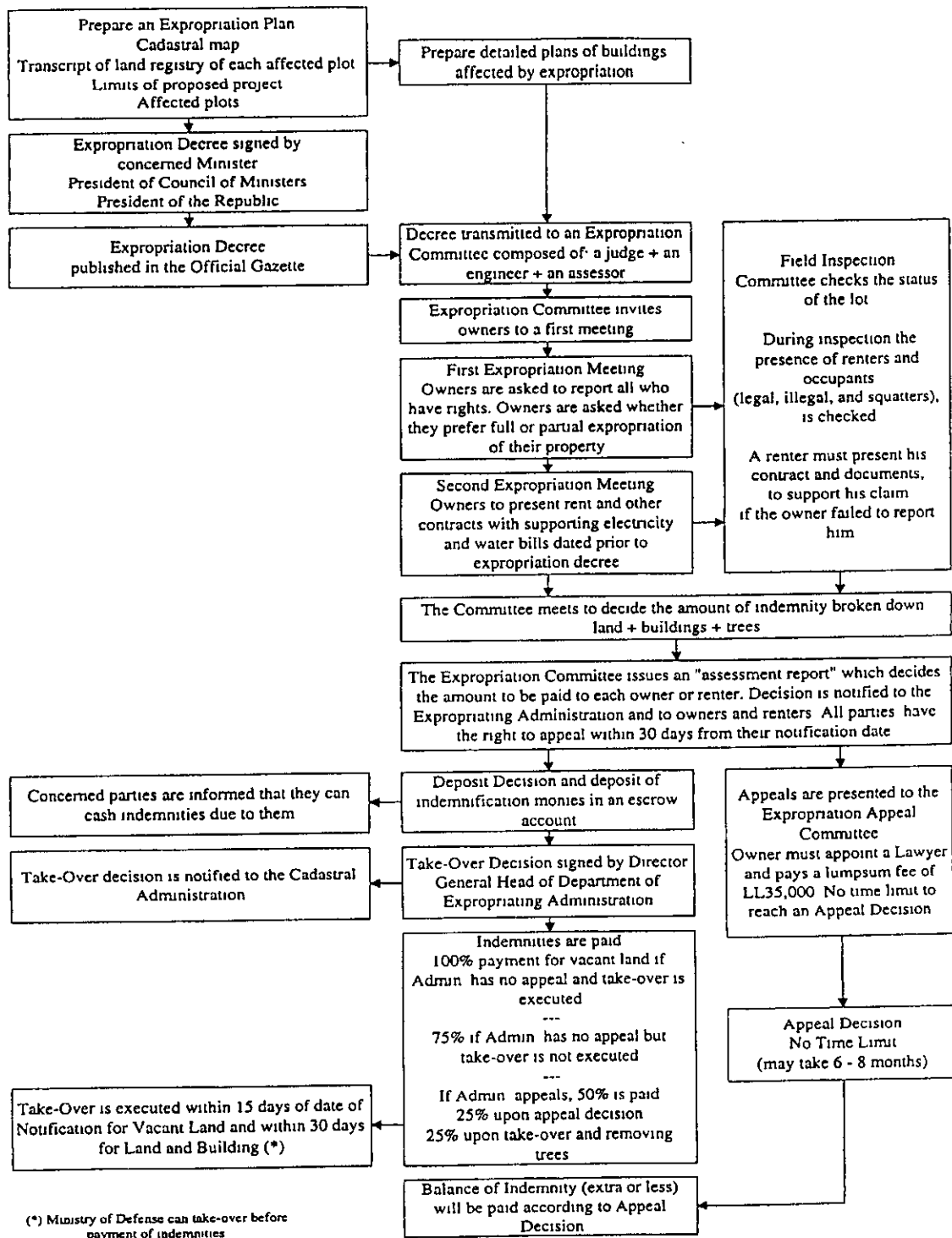
37. These indicators will be developed in the first RAPs as baseline indicators and will be reviewed from time to time for effectiveness.

38. Monitoring of outcomes for households physically affected by relocation or expropriation will take place before the move, and one year later.

Summary of Losses	Rights	
	Eligibility for Compensation under the terms of existing laws to be determined by Expropriation Committee	Other State assistance
Residential Property		
Owner & Resident	Full monetary compensation for loss of property and disturbance. Sufficient for replacement and transition costs	Eligible for state assistance for relocation and other related services
Absentee Owner Rented property	Full monetary compensation for property. Sufficient for replacement	Not Eligible for services
Absentee Owner (Squatted Property)	Full monetary compensation for property, sufficient for replacement. Owner regains property.	Not eligible for services
Contract tenant	Compensation for loss of secure tenancy and disturbance based on length of tenancy and present rights. (Apr or post 1991 contract)	Eligible for state assistance for relocation and other related services.
Tenant at will	Compensation for loss of tenancy	Eligible for state assistance for relocation and other related services
Squatter	No legal rights under national law. Compensated for all lost assets,	Project-specific amicable arrangements will be reached. If entitled, appropriate assistance may be provided through the Displaced People's Fund.

Summary of Losses	Rights	
	Eligibility for Compensation under the terms of existing laws to be determined by Expropriation Committee	Other State assistance
Business Property		
Owner & entrepreneur	Full monetary compensation for disturbance, loss of property, assets and business. Transition costs sufficient for reestablishing a similar business in a similar setting.	Eligible for state assistance for relocation and other related services.
Absentee Owner Rented property	Full monetary compensation for property. Sufficient for replacement.	Not eligible for state assistance
Contract tenant of a business	Full monetary compensation for loss of business, assets, rental location to permit reestablishment of a similar activity in a similar situation elsewhere.	Eligible for state assistance for relocation and other related services.
Tenant at will	Compensation for loss of business and assets to permit reestablishment of a similar activity elsewhere.	Eligible for state assistance for relocation and other related services
Squatter	No legal rights under national law.	Project specific assistance will be arranged and specified in the RAP to ensure no loss of assets, livelihood or hardship or diminution of standard of living.

EXPROPRIATION PROCEDURES FLOW CHART



Resettlement Action Plan for Khan El Askar Tripoli)

1. The treatment of Khan el Askar requires the resettlement of a small number of families and businesses (initially about 28) in and around the area. CDR has submitted a detailed Resettlement Action Plan to the Bank for appraisal. The proposal to upgrade this structure is highly justified, as the Khan is the center-point of the northern "gate" to the old town, a historically and architecturally significant and strategically placed building owned by the municipality and situated on municipal land. It is the keystone to the rehabilitation of the old town.
2. The inhabitants who were originally settled in the Khan as a short term expedient after the 1958 floods, pending provision of alternative housing, would all benefit from secure tenancy in affordable social housing to be constructed by the municipality on an adjacent plot that it owns. The building would also house commercial premises that would be displaced, except for rooms used purely for storage that would be relocated to a refurbished municipal storehouse unit also on the adjacent plot.
3. The resettlement plan would be implemented in close consultation with the affected persons, and institutional arrangements made for the handling of grievances.
4. Subsequent phases of resettlement and other scattered instances would be covered at the appropriate time by RAPs to be submitted to the Bank.