

THE BOARD'S REVIEW OF THE INSPECTION PANEL TOOLKIT

The Board of Executive Directors' three-year review of the Inspection Panel's toolkit concluded in 2020 with the creation of the World Bank Accountability Mechanism that will likely begin operations by early 2021 and house both the Inspection Panel to carry out compliance reviews and a new Dispute Resolution Service to provide an alternative way to resolve complaints.

Here is a list of enhancements approved by the Board during its review.

1. Extended the time limit for bringing complaints to the Inspection Panel

• Stipulates that any complaint filed up to 15 months after the closing date of the loan, credit or grant that financed a World Bank project can be eligible for the Panel process. Previously, complaints could not be registered by the Panel if 95 percent or more of a project's funds had been disbursed or if the project was closed. The new policy applies to projects approved on or after September 8, 2020. This change allows potential Requesters who may not have easy access to the Panel more time to file their complaints and brings the Panel more in line with good practice globally.

2. Authorized independent verification of Management Action Plan implementation

When approved by the Board, provides for independent and proportionate risk-based verification of Management Action Plan (MAP) implementation by the Panel and/or the Bank's Group Internal Audit. This change allows the Panel to go back to the field to ascertain from the Requesters directly whether the MAP is being properly implemented.

3. Authorized dispute resolution that is independent of Bank management

 Provides an option to resolve complaints in addition to the existing compliance-review process. After a complaint is found eligible by the Inspection Panel, complainants and the borrower may both agree to a time-bound dispute resolution process.

Updated procedures for sharing the Panel's Investigation Report with Requesters

Allows those who filed a Request for Inspection to view the Panel's Investigation Report shortly after it is submitted to the Board but before the Board meets to consider the report and approve the MAP. The change is intended to allow Requesters to be more meaningfully involved in consultations on the development of the MAP in response to Panel findings.

5. Formally recognized the Inspection Panel's advisory role

- Authorizes the Panel to provide advisory services in the form of lessons from its cases to support learning across the World Bank and in the development community.
- Formalized the Panel's current practice of coordinating with the independent accountability mechanisms of other international financial institutions on complaints involving co-financed projects to increase efficiency and avoid duplication.
- 7. Requested Management's clarification on the use of Bank-Executed Trust Funds

MESSAGE FROM THE PANEL

he Inspection Panel welcomes the decision by the Board of Executive Directors to create the new World Bank Accountability Mechanism that will house both the Panel and a new Dispute Resolution Service (DRS) to provide communities with different ways to have their concerns addressed.

Other changes approved by the Board at the end of its three-year review of the Panel's toolkit provide project-affected people more time to file a complaint, now up to 15 months after project closure, and allow the Panel, with Board approval, to verify the implementation of some Management Action Plans (MAPs) developed in response to Panel Investigation Reports.

A change made by the Board earlier in the review process authorized the sharing of the Panel's Investigation Report with Requesters after it has gone to the Board but before it is considered by the Board, giving them a chance to more meaningfully consult on the development of MAPs. The Panel has implemented this change on two occasions so far in cases in Uganda and India and has been gratified by the active participation of Requesters in the process.

The Board, as part of its review, also formalized the Panel's role in providing advisory services in the form of lessons from its cases to support learning across the World Bank, and the Panel in May 2020 released an **advisory report** with insights on biodiversity offsets from three investigations into the Kalagala offset associated with the Bujagali power project in Uganda. The Panel also hosted a virtual discussion on the topic that was **watched live on YouTube** by more than 300 people in 17 countries.

These are all positive developments for project-affected communities—and for accountability at the World Bank.

Still, as some things change, some important basic things remain the same. The Inspection Panel will continue to be constituted and operate as it has since it was established by the Board in 1993 as the first independent accountability mechanism at an international financial institution.

Panel members will remain fully independent from World Bank management and the new Accountability Mechanism Secretary, who will also head the DRS, and will continue to report directly to the Board on all compliance investigation matters.

As always, the Panel expresses its thanks to the Board for its strong support of its work. We also thank the President of the World Bank Group, David Malpass, and senior management and staff for their continued constructive engagement with the Panel. We deeply appreciate the trust that Requesters place in the Panel and are grateful to civil society and other stakeholders for their partnership and efforts to promote accountability. Finally, we want to thank the staff of the Secretariat for their professionalism and hard work, particularly during the COVID-19 pandemic.

We look forward to working with all stakeholders in the coming year as part of the new World Bank Accountability Mechanism to provide a way for communities adversely affected by Bank projects to have their voices heard at the highest levels of the institution.

Imrana Jalal, *Chair* Ramanie Kunanayagam Mark Goldsmith



Inspection Panel members (from left to right): Ramanie Kunanayagam, Mark Goldsmith, Imrana Jalal (chair)

PANEL OPERATIONS DURING THE COVID-19 PANDEMIC

The Inspection Panel continued with its work during the COVID-19 pandemic. Following the directive of the World Bank, Panel members and staff worked from home from mid-March 2020 through the end of the fiscal year. As documented elsewhere in this report, during this period the Panel continued to accept and respond to Requests for Inspection, completed eligibility and investigation reports, launched a series of virtual workshops about its operations for civil society groups throughout the world and released its first advisory report since the Board of Executive Directors formalized the Panel's advisory function in 2018. The Panel also utilized this time to work on advisory reports on the topics of reprisals and retaliation against complainants, gender-based violence and land issues. Those reports will start being released in the new fiscal year.

THE INSPECTION PANEL

ANNUAL REPORT
JULY 1, 2019-JUNE 30, 2020





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PANEL DESCRIPTION

WHAT IS THE INSPECTION PANEL?

The Inspection Panel is an independent complaints mechanism for people and communities who believe that they have been, or are likely to be, adversely affected by a World Bank-funded project. The Bank's Board of Executive Directors created the Panel in 1993 to ensure that people have access to an independent body to express their concerns and seek recourse.

The Panel is an impartial fact-finding body, independent from the World Bank management and staff, reporting directly to the Board. Its process aims to promote accountability at the World Bank, give affected people a greater voice in activities supported by the World Bank that affect their rights and interests, and foster redress when warranted.

HOW DOES THE INSPECTION PANEL WORK?

In response to complaints from project-affected people, the Panel has a mandate to review projects funded by the World Bank through the International Bank for Reconstruction and Development (IBRD) and International Development Association (IDA). The Panel assesses allegations of harm to people or the environment and reviews whether the Bank followed its operational policies and procedures.

This often includes issues such as:

- Adverse effects on people and livelihoods as a consequence of displacement and resettlement related to infrastructure projects, such as dams, roads, pipelines, mines and landfills.
- Risks to people and the environment related to dam safety, use of pesticides and other indirect effects of investments.
- Risks to indigenous peoples, their culture, traditions, lands tenure and development rights.
- Adverse effects on physical cultural heritage, including sacred places.
- Adverse effects on natural habitats, including protected areas such as wetlands, forests and water bodies.

As approved by the Board in 2018, the Panel also provides advisory services through different reports and publications on lessons emerging from its cases.

The Panel has produced two videos explaining its mandate and procedures to potentially affected communities and their representatives. Both can be found on the Panel website.

HOW IS THE INSPECTION PANEL STRUCTURED?

The Inspection Panel consists of three members each appointed by the Board for a five-year non-renewable term. Members are selected on the basis of their ability to deal thoroughly and fairly with the complaints brought to them, their integrity and independence from Bank management, and their exposure to development issues and living conditions in developing countries.

In fiscal year 2020, Panel Member Jan Mattsson completed his term and was succeeded in November 2019 by Mark Goldsmith. The other two Panel members were Imrana Jalal (a member since January 2018 who has served as chair since December 2018) and Ramanie Kunanayagam (a member since December 2018).

The Panel also has a permanent Secretariat that provides operational, technical and logistical support to the chair and Panel members, and assists the Panel in processing complaints, conducting investigations and responding to questions from potential complainants. It organizes outreach events and provides information about the Panel through publications and social media.

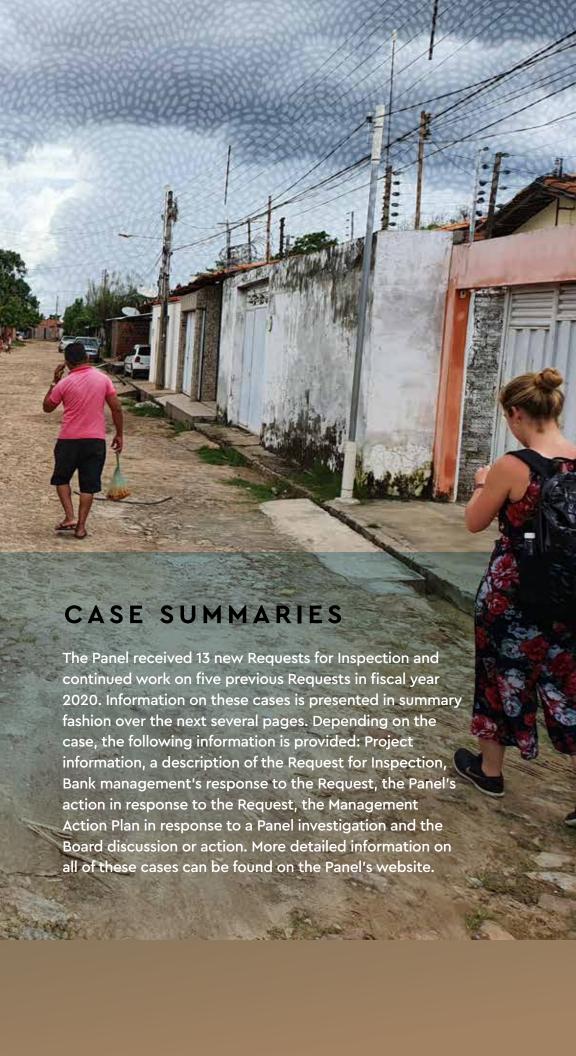
The Secretariat is currently headed by Executive Secretary Dilek Barlas, and, at the end of fiscal year 2020, consisted of Senior Operations Officers Serge Selwan and Reinett Erkan, Operations Officers Birgit Kuba and Tamara Milsztajn, Senior External Affairs Officer Rob Doherty, Senior Executive Assistant Oriana Bolvaran, Research Assistant Rupes Dalai and consultant Camila Jorge do Amaral.

The Panel hosts student interns each summer and welcomes others for temporary practical learning experiences. For its investigations, the Panel hires independent, internationally recognized experts to ensure objective and professional assessment of the issues under review.



(From left to right): Senior Operations Officer Serge Selwan, Operations Officer Tamara Milsztajn, Senior External Affairs Officer Rob Doherty, Panel Member Ramanie Kunanayagam, Panel Chair Imrana Jalal, Senior Executive Assistant Oriana Bolvaran, Research Assistant Rupes Dalai, Operations Officer Birgit Kuba, Senior Operations Officer Reinett Erkan, Executive Secretary Dilek Barlas and Panel Member Mark Goldsmith.





INVESTIGATIONS

UGANDA: WATER MANAGEMENT AND DEVELOPMENT PROJECT (WMDP); ENERGY FOR RURAL TRANSFORMATION PHASE III PROJECT (ERT-III)

CASE NOS. 110, 113

THE REQUEST

The Panel received two Requests for Inspection relating to the Bank-financed Uganda Private Power Generation (Bujagali) Project, the Water Management and Development Project (WMDP) and the Energy for Rural Transformation Phase III Project (ERT-III) in 2016. The Panel decided to process the two Requests jointly.

The Requesters alleged harm caused by the construction of the Isimba Dam and the consequent flooding of the Kalagala Falls Site (KFS) on the Victoria Nile River in Uganda that forms part of the Kalagala Offset Area (KOA). While the World Bank Group was not financing the Isimba hydropower project, the Requesters alleged that the flooding caused by the filling of its reservoir would undermine the management of protected natural resources in the KOA and adversely affect livelihoods. Establishing and maintaining the KOA was a requirement for World Bank support of the 2007 Uganda Private Power Generation (Bujagali) Project under the Bank's Natural Habitats Policy, since the Bujagali reservoir inundated the Bujagali Falls, river islands and pristine natural habitat. An Indemnity Agreement (IA) between the International Development Association and the Government of Uganda for the Bujagali project included specific provisions related to the KOA for these purposes, including a sustainable management program and budget.

MANAGEMENT RESPONSE

In its October 2016 response, management argued the Requests were ineligible on several grounds. It stated the potential harm alleged by the Requesters did

PROJECT INFORMATION

Water Management and Development Project (WMDP)

Project No: P123204

Region: Africa

IDA Credit Amount: US\$135 million

Board Approval Date: June 26, 2012

Closing Date: December 31, 2018

The development objectives of the project were to improve: (i) integrated water resources planning, management and development; and (ii) access to water and sanitation services in priority areas. The project will contribute to higher level goals of sustaining natural resources, improving service delivery and increasing economic productivity.

Energy for Rural Transformation Phase III Project (ERT-III)

Project No: P133312

Region: Africa

IDA Credit Amount: US\$135 million

Board Approval Date: June 5, 2015

Closing Date: December 31, 2020

The development objective of the project is to increase access to electricity in rural areas of Uganda.



not stem from a Bank-supported project but was related to the development of the Isimba project, which was not financed by the Bank and, as a result, was not subject to Panel review. Management also contended that the Bujagali project was completed and the project was therefore not eligible for the Panel's review. It further argued that WMDP and ERT-III did not relate to the harm alleged in the Requests. Finally, according to management, the issues raised in these Requests were addressed in the Panel's recommendations relating to prior Requests for Inspection in 2001 and 2007.

PANEL RECOMMENDATIONS/BOARD ACTIONS

The Panel on December 16, 2016, recommended to defer by up to one year its decision on whether an investigation was warranted. The Panel explained deferring its decision would allow it to wait for the completion of the Environmental and Social Impact Assessment (ESIA) addendum that Bank management was preparing at that time and follow-up actions by the Bank. On April 4, 2017, the Board of Executive Directors approved the Panel's recommendation to defer its decision on whether an investigation was warranted into the WMDP and the ERT-III but found that the Bujagali project was not eligible to be investigated because the project was closed.

In May 2018, the Panel submitted its Second Report and Recommendation and recommended an investigation into the WMDP and ERT-III. The Board approved the recommendation in September 2018 and a Panel team conducted its investigation visit in November 2018.

PANEL INVESTIGATION REPORT AND BOARD ACTIONS

The Panel submitted its Investigation Report to the Board on May 2, 2019.

The Panel investigation found three key areas of Bank non-compliance with its policies and procedures. The first related to the management of the KOA. From 2012 onward, the WMDP supported certain activities under the Kalagala Offset Sustainable Management Plan (KOSMP). Although funding and capacity constraints relating to the KOSMP became evident through WMDP supervision, management did not address these issues to ensure the maintenance of the KOA, according to the Panel.

The second area related to the Bank's funding of the ESIA addendum. After becoming aware of the plans to construct the Isimba Dam in 2012, the Bank determined in 2015 that the ESIA for Isimba did not include sufficient information on its impact on the KOA and therefore compliance with the IA could not be deter-

mined. The Bank then requested an addendum to the ESIA and later agreed to finance it under ERT-III due to funding constraints on the government. When the addendum was finalized, the Isimba Dam construction was 76 percent complete. The Panel found that the ESIA addendum was completed too late to influence the design of Isimba, improve decision-making or help ensure that the project was sustainable and that its mitigation measures were environmentally sound. The Panel also found that Bank management did not take adequate, timely and effective measures in response to the threats posed by the construction of the Isimba Dam and failed to ensure the protection of the KOA. The Panel further noted that management, through its funding of the addendum, provided its implicit support to the project alternative with the most severe impact on the KOA without a robust scientific basis and adequate analysis.

The third key area of non-compliance concerned the establishment of an Extended Kalagala Offset Area (EKOA). Based on the recommendations of the addendum, the Bank advised the government to extend the KOA to ensure its protection under Ugandan law and to update its management plan. The Panel found that the impact of the establishment of the EKOA was not systematically assessed and adequately mitigated in line with Bank policies and that, in spite of the challenges faced by the original offset area, management did not assess the institutional capacity and funding arrangements to implement appropriate conservation measures.

The Panel concluded that biodiversity offsets can be an important mechanism to achieve biodiversity conservation but need to be well designed and adequately managed and funded to achieve their objectives. The Panel noted its concern over the precedent being set by "offsetting an offset," whether that be through changing boundaries or adding new areas, in lieu of proactive monitoring of an area that was put aside as a condition for a Bank-financed project.

The Management Report and Recommendation responding to the Panel's finding was submitted on July 3, 2019. The Board met on December 3, 2019, and approved the Management Action Plan. In its Report and Recommendation, the Bank agreed with the Panel that there had been weaknesses in the management and protection of the original offset area but stated that these considerations had informed the 2018 amendment of the IA and the ensuing agreement on follow-up implementation actions that management believed would help address the challenges highlighted in the Panel's report.

Management further agreed with the Panel that the extended offset area will need to be effectively established and legally protected in ways that appropriately address potential social impact. According to management, the Government of Uganda had committed to (i) declare the EKOA as a Special Conservation Area under the National Environment Act, (ii) prepare and adopt a management plan for the EKOA in close consultation with the Bank, and (iii) prepare and adopt a livelihood restoration plan and possible resettlement action plan.

Management stated it would monitor the implementation of these plans through 2023 when the Bujugali project guarantee expires.

The Panel's Investigation Report and the Management Report and Recommendation can be found on the cases pages of the Panel's website.

The Investigation Report in this case was shared with the Requesters in May 2019, prior to the Management Action Plan consultation. It marked the first use of a new tool approved by the Board in October 2018. The tool is intended to allow the informed and effective participation of the Requesters in the consultation.

INDIA: RURAL WATER SUPPLY AND SANITATION PROJECT FOR LOW INCOME STATES (RWSSP)

CASE NOS. 128, 129

THE REQUESTS

The Panel registered two Requests for Inspection of the project in November and December 2018, respectively, and processed them jointly. The first Request was submitted by 104 Santhal tribal community members from a village in the state of Jharkhand. The Requesters, who asked for confidentiality, were concerned about the construction of a water treatment plant (WTP) near their village as part of the Bagbera rural water multi-village scheme financed under the RWSSP. They questioned the location of the WTP and alleged the plant was constructed on their community land, which has historical and cultural significance to the Santhal tribe due to the presence of an ancestral sacred grove, as well as burial and cremation grounds. They claimed a loss of access to community resources and medicinal herbs. Additionally, they expressed concern over the environmental impact of the proposed plant, the lack of analysis of alternatives and insufficient environmental and social assessment. The Requesters also claimed a lack of consultation and information disclosure in local languages and expressed concern about retaliation.

The second Request came from 130 Santhal and Ho tribal community members from another village in Jharkhand. They also asked for confidentiality. These Requesters were concerned about the construction of an elevated storage reservoir (ESR) as part of the Chhotagovindpur rural water multi-village scheme funded by the project. The Requesters contended that the ESR location is an important martyrdom site both for the community and for the state of Jharkhand in honor of men from this community who gave their lives to the struggle for Jharkhand's statehood. They also claimed they will be impoverished by having to pay for water they currently access for free. They further raised concerns that no social assessment was prepared to evaluate this scheme's impact on indigenous peoples or examine project alternatives concerning environmental impact, as well as additional concerns about a lack of consultation and disclosure of information.

MANAGEMENT RESPONSE

In its response to the Requests, management acknowledged shortcomings in compliance with Bank safeguard policy requirements in the implementation of the

PROJECT INFORMATION

Rural Water Supply and Sanitation Project for Low Income States

Project No.: P132173

Region: South Asia

IDA Credit Amount: US\$500 million

Board Approval Date: December 30, 2013

Closing Date: March 31, 2020

The project development objectives were "to improve piped water supply and sanitation services for selected rural communities in the target states through decentralized delivery systems and to increase the capacity of the participating states to respond promptly and effectively to an eligible crisis or emergency."



project component for the construction of the WTP and the ESR in the vicinity of the Requesters' habitations. In both cases management stated that the shortcomings pertained "to weaknesses in design and supervision, the conduct and documentation of consultations, the disclosure of key scheme-specific documents, a non-objection to the initiation of works ahead of an approved Environmental Management Plan (EMP) and failure to apply" Operational Policy (OP) 4.11 on Physical Cultural Resources.

In responding to the first Request, management stated that since many members of the community have expressed interest in benefiting from the clean water supply that will be delivered by the project, it was not feasible to stop project works. However, management identified several actions in response to community concerns and to address overall project shortcomings—including working with the government to conduct consultations, supported by experts in anthropology and cultural heritage, to better understand community concerns and identify compensatory measures. Management also committed to conducting consultations on the updated EMPs and ensuring that executive summaries of safeguard documents be translated into Hindi. Management explained that the project would be restructured and OP 4.11 will apply to the project.

In responding to the second Request, management explained that the complainants' demand to stop construction works and remove the scheme was not practical, since the ESR was virtually completed and operational trial runs were ongoing. Management added that there was a strong demand for piped water from associated communities and stopping the works could pose risks of retal-



iation against those opposing the scheme. However, management agreed with the borrower on several actions to address the second Requesters' concerns and overall project shortcomings—including consulting the second Requesters on several possible remedial measures, updating the Information, Education and Communication materials and finalizing the versions in Santhali and Ho, and consulting and disclosing the EMP.

PANEL RECOMMENDATION/BOARD ACTION

On February 12, 2019, the Panel sent its eligibility report to the Board, recommending an investigation of the project. The Board approved the Panel's recommendation on March 1, 2019.

A Panel team visited the project sites in late June and early July of 2019. The Panel submitted its Investigation Report to the Board on January 15, 2020, and a copy of the report was shared with the Requesters so that they could better participate in the consultations on the Management Action Plan (MAP) in response to the Panel's findings.

Preparation of the MAP was delayed into the summer of 2020 because travel restrictions as a result of the COVID-19 pandemic affected the Bank's ability to complete consultations with the affected communities. As a result, a Board meeting to consider the Panel's Investigation Report and to approve the MAP was pending as of June 30, 2020.

BRAZIL: TERESINA ENHANCING MUNICIPAL GOVERNANCE AND QUALITY OF LIFE PROJECT ADDITIONAL FINANCING

CASE NO. 140

THE REQUEST

The Panel received a Request for Inspection of Phase 2 of the project on August 23, 2019, from 202 families who live in the Mafrense and São Joaquim neighborhoods of Teresina. The Requesters expressed their support for the project. However, they opposed their resettlement and claimed alternate project designs would enable them to stay in their homes. They contended community members have been living in these locations for several decades and that by displacing and dislocating their community, the project would cause cultural, social and economic harm. They also expressed concern about a lack of disclosure of information and consultation and a lack of opportunity to participate in the resettlement planning.

The Catholic Archdiocese of Teresina's Human Rights Commission and the Federal Public Defender's and Public Prosecutor's offices in Piauí submitted letters in support of the Request.

The Panel registered the Request on September 19, 2019.

MANAGEMENT RESPONSE

Bank management stated the project was designed to respond to two challenges faced by the Municipality of Teresina related to recurrent floods in Lagoas do Norte, one of the most environmentally and socially vulnerable and poorest areas of the city, and to unplanned urban development over the years. Management further stated the World Bank made every effort to follow the policies and procedures applicable to the matters raised in the Request. It added it identified some weaknesses in the project's Resettlement Action Plans that were being addressed in line with Bank policy and that it agreed with the borrower on actions to improve project implementation.

PROJECT INFORMATION

Teresina Enhancing Municipal Governance and Quality of Life Project Additional Financing

Project No.: P146870

Region: Latin America and Caribbean

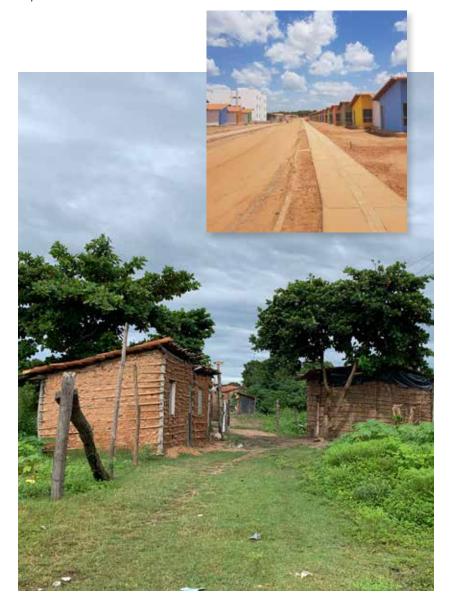
IBRD Loan Amount:US\$88 millionBoard Approval Date:February 24, 2016Closing Date:December 15, 2021

The project development objectives are to modernize and improve the management capacity of the Municipality of Teresina in the financial, urban, environmental, service-delivery and economic development fields and to improve the quality of life of the low-income population of the Lagoas do Norte region. An Additional Financing loan of US\$88 million was approved on February 24, 2016, as Phase 2 of the project.

PANEL RECOMMENDATION/BOARD ACTIONS

A Panel team visited Brazil from November 5 to 11, 2019, and held meetings with a variety of stakeholders in Brasília and Teresina. In its November 25, 2019, Report and Recommendation to the Board recommending an investigation, the Panel noted support for the project from stakeholders including the Requesters and acknowledged the positive actions management proposed to address the Requesters' concerns and the requirements of Bank policy. However, the Panel explained that it remained unclear on the adequacy of management's actions to address those concerns and whether these commitments could be implemented within the suggested timeline. The Board approved the Panel's recommendation to investigate the project on December 13, 2019, and the Panel published its investigation plan on January 7, 2020.

A team from the Panel visited Brazil March 9–18, 2020, to meet with all relevant stakeholders. The Panel submitted its Investigation Report to the Board on July 22, 2020.



NEPAL: NEPAL-INDIA REGIONAL TRADE AND TRANSPORT PROJECT

CASE NO. 147

THE REQUEST

The Request for Inspection was submitted on April 25, 2020, by nine community members from the Kirtipur Municipality in southern Kathmandu. During the Panel's initial due diligence, it received the signature of an additional Requester as well as a letter authorizing a representative to represent the Requesters during the Panel process. The Requesters and their representative asked the Panel to keep their identities confidential.

The Requesters claimed to be adversely affected by the Chobhar dry port, which is one of the project's subcomponents. They alleged non-compliance with the World Bank's policies on Environmental Assessment, Indigenous Peoples, Physical Cultural Resources and Involuntary Resettlement and argued that the project failed to address historical land claims, pollution and labor concerns relating to a cement factory that used to be located at the site of the new dry port. According to the Request, the dry port will have environmental and social impact on neighboring communities, including Newars, that the Project did not identify as indigenous, thus infringing indigenous peoples' rights. The Requesters argued the project will also damage Chobhar's historical, religious and cultural heritage. Further, they alleged a lack of effective consultation, disclosure of information and grievance redress, and raised concerns about the deployment of armed police forces at the construction site against community members opposing the project.

The Panel registered the Request on May 27, 2020. As the fiscal year ended the Panel was preparing its eligibility report for the Board that will recommend whether the project should be investigated.

PROJECT INFORMATION

Nepal-India Regional Trade and Transport Project

Project No.: P144335

Region: South Asia

IDA Credit and Grant Amount: US\$99 million equivalent

Board Approval Date: June 28, 2013
Closing Date: November 30, 2021

The development objective of the project is to "decrease transport time and logistics costs for bilateral trade between Nepal and India and transit trade along the Kathmandu-Kolkata corridor for the benefit of traders by reducing key infrastructure bottlenecks in Nepal and by supporting the adoption of modern approaches to border management."

CASES NOT INVESTIGATED

KENYA: TRANSPORT SECTOR SUPPORT PROJECT— AND ADDITIONAL FINANCING

CASE NO. 130

THE REQUEST

The Panel received the Request for Inspection in December 2018 from three members of the project-affected community. The Requesters, who asked the Panel to keep their identities confidential, alleged harm from the Webuye interchange construction, which is part of the Webuye-Kitale road works financed by the project. The Request raised concerns about the environment, community health and safety, livelihoods and labor conditions, as well as a lack of consultation and information disclosure.

The Panel registered the Request on January 17, 2019.

MANAGEMENT RESPONSE

In its February 2019 response, Bank management stated that most of the issues raised in the Request had been resolved, adding that much of the impact was temporary and linked to construction, which was nearing completion. Management further stated that following the submission of the Request, a Bank mission met with community members and the Requesters to discuss their concerns and how they could be addressed. Management included in its response an action plan prepared to address these concerns by March 31, 2019.

PANEL RECOMMENDATIONS/BOARD ACTIONS

A Panel team visited Kenya in early March 2019 and met with stakeholders including government authorities and community members. The Panel noted that, in addition to a group of mobile traders, small business owners were affected during construction of the interchange. Subsequently, Bank management informed the Panel that the terms of reference of a planned Resettlement Action Plan (RAP) audit

PROJECT INFORMATION

Transport Sector Support Project

Project No.: P124109
Region: Africa

IDA Credit Amount:U\$\$300 millionBoard Approval Date:April 21, 2011Closing Date:December 31, 2019

Transport Sector Support Project—Additional Financing

Project No.: P146630
Region: Africa

IDA Credit Amount:U\$\$203.50 millionBoard Approval Date:March 26, 2014Closing Date:December 31, 2019

Among the project development objectives was increasing the efficiency of road transport along the Northern Corridor and the Tanzania-Kenya-Sudan road corridor.



were expanded to include identification of mobile traders, most of them women, who were active in the area by the January 2011 cutoff date of the original RAP and small business owners who were not appropriately compensated for business disruption, in an attempt to address adverse effects on their livelihoods.

On March 22, 2019, the Panel issued its Report and Recommendation to the Board noting the many advantages of the project for Kenya's national economy as well as for the local economy in Webuye. The Panel recognized that the action plan, when fully implemented, would address most of the concerns raised by Requesters. During its visit, the Requesters had told the Panel they would welcome additional measures to address their concerns, especially as they related to the restoration of liveli-

hoods. They also expressed their support for a Panel decision to defer its investigation recommendation in order to await the implementation of such measures. As a result, the Panel informed the Board it was deferring its recommendation as to whether an investigation is warranted and would reassess the situation and inform the Board of its recommendation within six months.

The Board approved the Panel's deferral recommendation on April 5, 2019.

The Panel on November 19, 2019, recommended a second deferral, this time for four months. The Panel stated it had reviewed the progress achieved so far in the implementation of the various actions to which management had committed and was satisfied that these actions were on track. However, the Panel noted that some actions—a land transfer for the construction of a market for mobile traders, the disclosure of the RAP audit results and compensation related to the mobile traders and small business owners—required additional time for completion.

The Board approved the Panel's decision to defer its recommendation for an additional four months on December 6, 2019.

The Panel submitted its third and final eligibility report to the Board on June 9, 2020. In recommending not to investigate the project, the Panel noted the opposing views of World Bank management and the Requesters but cited management's concerted effort to address the outstanding harm—and the temporary impact of the harm, which had since dissipated. Specifically, the Panel noted the efforts made to value losses to small business owners and compensate them and to acquire land in close proximity to the Webuye interchange to build a market for mobile traders.

The Panel was satisfied that a serious, although not an exact, attempt was made to estimate the income lost by the small businesses. The Panel noted that while the lack of verifiable records made the task difficult, this could not be attributed to an omission by Bank management. The Panel also noted that due to the absence of willing sellers near the Webuye interchange, land that the mobile traders would consider appropriate could not be acquired. The Panel further noted the allocation of a plot 2.5 kilometers away is reasonable and provides an opportunity for the mobile traders to have a stall or a kiosk where they can ply their trade and generate income.

The Board approved the Panel's recommendation not to investigate on June 23, 2020.

POLAND: ODRA-VISTULA FLOOD MANAGEMENT PROJECT

CASE NOS. 135-139, 141-144

THE REQUEST

Between June 21, 2019, and October 7, 2019, the Panel received nine Requests for Inspection of the project. The Requests were submitted by representatives of German and Polish civil society organizations, private institutions operating in the Odra Valley and individuals living in the vicinity of the Border Odra in both countries as well as in the Klodzko Valley in Poland.

The first five Requests were similar in nature and alleged that project activities on the Odra River at the border between Germany and Poland cause potential harm to biodiversity, increase flood risks and have transboundary impact on Germany. The sixth Request added concerns about hydro-engineering works on the Vistula River and claimed that the project would undermine and destroy Natura 2000 habitats. The seventh Request concerned environmental issues relating to the project's dry reservoirs. The eighth and ninth Requests added concerns about involuntary resettlement in the Klodzko Valley and claimed that the construction of dry reservoirs there significantly interferes with the local landscape, cultural values and integrity of some towns.

The Panel registered the nine Requests on September 17, September 26 and October 10, 2019, respectively.

MANAGEMENT RESPONSE

Bank management explained that it understood the concerns of the Requesters and had engaged with different stakeholders and civil society organizations on a continuous basis. Management stated that it believed that the concerns were appropriately addressed by the project's design and mitigation measures and explained that it remained committed to continue discussing any outstanding concerns. According to management, the project is technically sound and in compliance with Bank policies, and its design is based on thorough studies by reputable firms.

PROJECT INFORMATION

Odra-Vistula Flood Management Project

Project No.: P147460

Region: Europe and Central Asia
IBRD Loan Amount: US\$504.04 million
Board Approval Date: July 23, 2015
Closing Date: December 15, 2023

The development objectives of the project are to "increase access to flood protection for people living in selected areas of the Odra River and the Upper Vistula River basins and to strengthen the institutional capacity of the borrower to mitigate the impact of floods more effectively."



PANEL RECOMMENDATION/BOARD ACTION

Between November 11 and 17, 2019, a Panel team held meetings in Warsaw, Wroclaw and Berlin, and visited project sites in the Klodzko Valley and along the Odra River at the German-Polish border.

On December 17, 2019, the Panel submitted its Report and Recommendation to the Board. In recommending the project not be investigated, the Panel took into account the design of the project, including its mitigation measures, and adjustments that were made following the phased environmental assessment process, which included changes resulting from stakeholder input during consultations. The Panel also noted Bank management's commitments to assist the borrower in strengthening capacity for communication and community outreach and to monitor the resolution of outstanding resettlement issues.

The Board approved the Panel's recommendation not to investigate on January 10, 2020.

SRI LANKA: ECOSYSTEM CONSERVATION AND MANAGEMENT PROJECT

CASE NO. 145

THE REQUEST

The Panel received the Request for Inspection on October 21, 2019, from two individuals from Sri Lanka who also attached a representation of 106 community members from the Sinharaja Forest Reserve area. The Requesters asked the Panel for confidentiality.

The Requesters claimed that the Bank-financed project is causing harm to community livelihoods and the natural environment through road construction activities in the Sinharaja Forest Reserve, a World Biosphere Reserve (1978) and UNESCO World Heritage Site (1988). The Requesters raised concern over the adverse impact of the road construction on several endemic species of fauna and flora, as well as on local livelihoods. They also claimed a lack of consultation and disclosure of information with the communities around the Kudawa area of the Sinharaja Forest Reserve.

The Panel registered the Request on December 9, 2019.

MANAGEMENT RESPONSE

In its response, Management stated that the concerns expressed in the Request were caused by works that were not part of the agreed activities supported by the project. Bank management further stated the Bank had agreed to include the access road cited by the Requesters in the project to help complete the rehabilitation works in line with Bank policies, and to help address concerns resulting from the previous rehabilitation works, which were carried out by the Forest Department without prior consent from the Bank. As a result, management stated it believed that the Requesters' rights or interests had not been, nor will they be, directly and adversely affected by a failure of the Bank to implement its policies and procedures.

PROJECT INFORMATION

Ecosystem Conservation and Management Project

Project No.: P156021

Region: South Asia

IDA Credit Amount: US\$45 million

Board Approval Date: April 25, 2016

Closing Date: June 30, 2021

The project development objective is to improve the management of ecosystems in selected locations in Sri Lanka for conservation and community benefits.





PANEL RECOMMENDATIONS/BOARD ACTIONS

A Panel team visited Sri Lanka from January 27 to 30, 2020, and held meetings with a range of stakeholders in Colombo and at the project site.

On February 14, 2020, the Panel submitted its Report and Recommendation to the Board. In recommending the project not be investigated, the Panel noted that the existing Kudawa access road rehabilitation was not initially included in the World Bank-funded project, and that the alleged harm raised by the Requesters is focused on a time period before the World Bank was involved.

The Panel understood that Bank management included the rehabilitation of the access road among the project activities in order to assist Sri Lanka's Forest Department in bringing works in line with best practice, including the implementation of an Environmental and Social Management Plan and necessary consultations and supervision with the involvement of the affected community.

The Panel observed that since the access road has been included in the World Bank-funded project, the stakeholder engagement process appeared to have worked reasonably well, with several design changes and additional mitigation measures resulting from input during formal consultations and other interactions with interested groups and affected people. The Panel stated it was also encouraged by an approach for joint supervision of the corrective measures and noted the support and commitment of local committees to participate in joint supervision.

The Board approved the Panel's recommendation not to investigate on March 2, 2020.

BRAZIL: PIAUÍ PILLARS OF GROWTH AND SOCIAL INCLUSION PROJECT

CASE NO. 146

THE REQUEST

The Panel on December 6, 2019, received a Request for Inspection of the multisectoral project, focusing on its components relating to land tenure regularization. The Request was submitted by three members of traditional communities in the Cerrado (savannas) region of Piauí. The Panel later received seven additional signatures from representatives of five traditional communities in support of the Request, and the additional Requesters authorized a member of the Pastoral Land Commission of Piauí to represent them during the Panel process. The Requesters and their representative asked the Panel to keep their identities confidential.

The Requesters alleged that local traditional communities have been left out of the land tenure regularization process under the project. According to the Requesters, the project promotes regularization mainly for agribusiness and large landowners whose farming practices destroy biodiversity, soil and water. They claimed that the region has a history of land grabbing, which is being legitimized through the project. As a result, they argued, local traditional communities are losing their lands, crops and subsistence. They also claimed lack of social assistance, public safety and access to education.

The Panel registered the case on January 21, 2020.

MANAGEMENT RESPONSE

Management argued that, while it understood the Requesters' concerns regarding their tenure security, the project neither causes nor contributes to these concerns. Management explained that the project is strengthening the land tenure of small-scale farmers and Quilombola communities (descendants of Afro-Brazilian slaves who escaped the slave settlements) by supporting access to land titling, registration and legal ownership of the lands on which these communities live. According to Bank management, many allegations in the Request were inaccurate and did not reflect the project's objectives and activities. Man-

PROJECT INFORMATION

Piauí Pillars of Growth and Social Inclusion Project

Project No.: 129342

Region: Latin America and Caribbean

IBRD Loan Amount:US\$120 millionBoard Approval Date:December 21, 2015Closing Date:December 31, 2020

The project development objectives are to (i) reduce the incidence of student dropouts in public secondary education; (ii) increase access to diagnosis and treatment for patients with chronic diseases; (iii) expand the registration of groundwater users in rural areas and land tenure regularization; and (iv) increase the participation of rural family farmers in rural productive value chains.



agement emphasized the project neither supports nor promotes regularization for agribusiness and/or large landowners, nor are they entitled to receive any support under the project.

PANEL RECOMMENDATION/BOARD ACTION

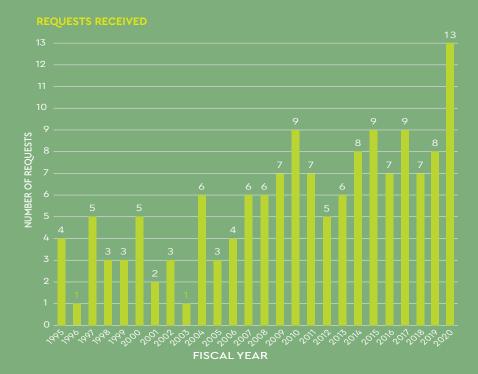
A Panel team visited Brazil from February 29 to March 7, 2020, and met with the Requesters, their representative and other project-affected community members, staff in the World Bank's Country Office and government officials.

The Panel submitted its Report and Recommendation to the Board on March 20, 2020. In recommending that the project not be investigated, the Panel acknowledged the serious concerns of the Requesters and noted that the Bank may have underestimated the complexity of the land regularization process and the capacity requirements of the implementing agency at the start of the project. However, the Panel found that the alleged harm has not occurred as a result of the Bank supporting the land titling component of the project. In addition, the Panel recognized the Bank has added some traditional communities into the project and that the slow pace of land titling for traditional communities is due to factors outside of the project's control.

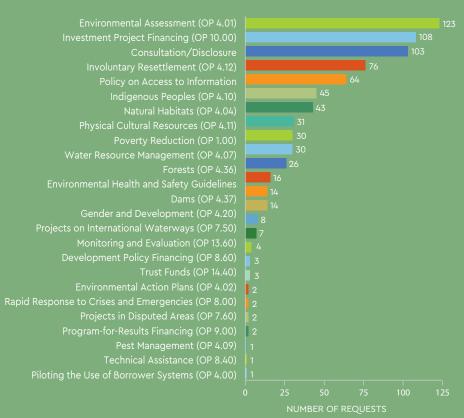
The Board approved the Panel's recommendation not to investigate on April 3, 2020.



APPENDIX I: GRAPHS ON PANEL CASES



MAJOR POLICY ISSUES RAISED IN REQUESTS, FISCAL YEARS 1995–2020

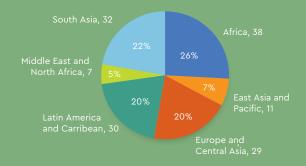


GEOGRAPHIC DISTRIBUTION OF CASES

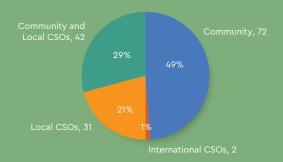




REGIONAL DISTRIBUTION OF CASES



TYPE OF REQUESTERS







CASE PROCESSING HISTORY



APPENDIX II:

BIOGRAPHIES OF PANEL MEMBERS AND EXECUTIVE SECRETARY

IMRANA JALAL (Chair)

Imrana Jalal was appointed to the Inspection Panel on January 1, 2018, and became chair on December 16, 2018. A Fiji national, Ms. Jalal brings to the Panel more than 30 years of experience across diverse geopolitical and multicultural environments in the private and public sectors.

As a Principal Social Development Specialist (Gender and Development) for the Asian Development Bank from 2010–2017, Ms. Jalal gained intimate knowledge of multilateral development bank operations in various sectors and demonstrated her ability to engage and build rapport and



trust with stakeholders around various and complex issues. She was Chief Technical Adviser at the Pacific Regional Rights Resource Team Office from 1995–2010.

A lawyer by profession, Ms. Jalal was a Commissioner from 1999–2001 on the initial Fiji Human Rights Commission, the first of its kind in the Pacific Island countries. She is the author of "Law for Pacific Women: A Legal Rights Handbook," architect of the Fiji Family Law Act 2003, and was a founding member of the Fiji Women's Rights Movement. She was elected a Commissioner on the Geneva-based International Commission of Jurists (ICJ) in 2006 and served on the Commission's Executive Board from 2011–2017. The ICJ was established to protect the independence of judges and lawyers.

Ms. Jalal earned a master's degree with a focus on gender and development from the University of Sydney, and an LLB and LLM (Hons.) in international law from the University of Auckland.

In April 2019, she was elected to a second one-year term as Panel chair, effective December 16, 2019. In March 2020, the Panel voted to extend her term as chair through June 30, 2021.

Her term as a Panel member runs through December 31, 2022.

RAMANIE KUNANAYAGAM

Ramanie Kunanayagam, a Sri Lankan-born Australian citizen, was appointed to the Inspection Panel on December 16, 2018. She brings to the Panel three decades of experience across diverse geopolitical and multicultural environments in the private and public sectors.

Ms. Kunanayagam spent more than 10 years doing field-work in a remote part of East Kalimantan, Indonesia. She has held leadership positions in sustainability in both the private sector (working for two FTSE 10 companies) and the nonprofit sector. Most recently before joining the Panel she



was the Global Head for Social Performance and Human Rights for BG Group. She is a member of the boards of two international non-profit development organizations—RESOLVE and the Institute of Human Rights and Business.

Ms. Kunanayagam has strong operational experience working across the entire project cycle. Her experience with multinational and international organizations and valuable experience living and working in more than 30 countries make evident her people skills and ability to broker trust relationships. Her appointment as a secondee to the World Bank very early in her career also gives her insight into and knowledge of the organization's operations that complement the expertise she has developed working alongside civil society, multilaterals, bilaterals and communities affected by World Bank projects.

She earned a master's degree in anthropology from Monash University, Australia.

Her Panel term runs through December 15, 2023.

MARK GOLDSMITH

Mark Goldsmith, a United Kingdom citizen, was appointed to the Inspection Panel on November 17, 2019. He brings to the Panel more than 25 years of experience managing complex projects and teams across the financial services, development, strategy consulting and energy sectors. His leadership extends to both the public and private sectors where he has demonstrated the ability to manage multiple



stakeholders, understand complex issues and lead the implementation of industry-wide and sector-leading solutions.

Through his work in both emerging and developed economies, Mr. Goldsmith has dealt with a wide portfolio of complex and sensitive matters, including environmental, social, sustainability, safety, risk management and governance issues—experience that provides great value to the Panel.

Before creating his own sustainability consultancy "FiveOak" in 2015, Mr. Gold-smith was Director, Responsible investment for Actis for more than 10 years. During that time, he was a leader in environmental and social governance (ESG) thinking in the emerging markets. In this capacity he developed and promoted world class standards in business integrity, health and safety, social, environmental and climate change areas across all investment areas and companies and implemented robust corporate governance standards and transparent practices. From 2014 to 2019, Mr. Goldsmith was a non-executive director of ENEO, the power company of Cameroon, and chaired the board subcommittee on ESG for four of those years.

Mr. Goldsmith has led several assignments, including developing environmental and social training for CDC Group (the UK's developmental finance institute) on the International Finance Corporation's Performance Standards and providing ESG expert advice to an East Africa private equity fund and its portfolio companies.

He has a bachelor's degree in manufacturing engineering from the University of Nottingham and a master's degree in environmental pollution control, with distinction, from the University of Leeds.

His Panel terms runs through November 16, 2024.

DILEK BARLAS

Dilek Barlas has served as the Executive Secretary of the Inspection Panel since July 2014. In that capacity, Ms. Barlas provides strategic support and advice to the Panel Chair and Panel members; manages the Panel's Secretariat, its staff, consultants and resources; and maintains the Panel's relations with internal stakeholders (the Board of Executive Directors, its committees, World Bank senior management and staff) as well as external ones (Requesters, civil society organizations, academia and the media). Ms. Barlas was the



Panel's Deputy Executive Secretary from 2007 to 2014. A Turkish national, Ms. Barlas has extensive experience in the field of development.

A lawyer by training, Ms. Barlas joined the World Bank in 1992 and served as the Senior Counsel in the World Bank Legal Vice Presidency for the Europe and Central Asia region. As Senior Counsel she was responsible for the legal aspects of World Bank operations and conducted negotiations in numerous countries, including Albania, Azerbaijan, Uzbekistan, Bosnia and Herzegovina, and Turkey. Her work also included an overseas field assignment to the World Bank Office in Ankara, Turkey, from 2004 to 2006. Prior to joining the World Bank, Ms. Barlas served with the Under Secretariat of Treasury and Foreign Trade of Turkey and played a critical role in the preparation of Turkey's anti-dumping and subsidies legislation. Her private law practice includes work as an associate with White and Case in their Washington, D.C., office. Ms. Barlas holds a law degree from the University of Ankara, Turkey, and an LLM in international legal studies from the Washington College of Law at American University, Washington, D.C.

In June 2019, her term as Executive Secretary was extended for two years, through June 30, 2021.

APPENDIX III: INSPECTION PANEL BUDGET

Revised Budget	4,003,002
Original Budget	4,148,000
Total Budget Spent	3,845,642
Other Expenses	838
Contractual Services	57,124
Publications	44,026
Representation & Hospitality	2,418
Travel	210,079
Consultants (b)	721,469
Temporaries	41,311
Equipment and Building Services	441
Office Occupancy	172,841
Communications & IT Services	124,094
Benefits (a)	1,018,387
Salaries (a)	1,452,614

Notes

⁽a) Includes Chair salary and benefits

⁽b) Includes Panel members fees

HIGHLIGHTS OF THE PANEL'S YEAR

New Member; Extension for Panel Chair: Mark Goldsmith joined the Panel in November 2019, succeeding Jan Mattsson whose term had expired. The Panel voted to extend Imrana Jalal's term as chair until June 30, 2021. Ms Jalal first became chair in December 2018.

Caseload: The Panel received 13 complaints during the fiscal year. The Board considered a Panel Investigation Report related to a biodiversity offset in Uganda, and the Panel submitted another Investigation Report related to a water supply and sanitation project in India. An Investigation Report related to a municipal governance project in Brazil was submitted to the Board in July 2020, just after the close of the fiscal year. The Panel, following eligibility missions, recommended not to investigate projects in Poland, Sri Lanka and Brazil. The Panel also recommended not investigating a project in Kenya, but was unable to conduct a second eligibility visit in that case because of travel restrictions resulting from COVID-19. The Board approved all four Panel recommendations.

Panel Toolkit Review: The Board of Executive Directors completed its review of the Panel's toolkit during the fiscal year. The Board approved the creation of an expanded accountability mechanism comprising both the Panel to carry out compliance reviews and a new Dispute Resolution Service, both independent of Bank management. Details about other changes approved by the Board can be found elsewhere in this report.

Emerging Lessons Series: Among the new tools granted the Panel by the Board in 2018 as part of its review was the mandate to issue advisory services based on its cases. The Panel in May 2020 released the fifth report in its Emerging Lessons Series—the first since the Board formalized the Panel's advisory role—based on three Panel investigations of the Kalagala biodiversity offset associated with Bujagali Power Project in Uganda. To mark the release of the report, the Panel hosted a virtual discussion on the challenges of implementing biodiversity offsets that included World Bank Executive Director Anne Kabagambe; International Rivers Policy Director Josh Klemm; George Ledec, who had recently retired as lead ecologist at the World Bank; and registered natural scientist Susie Brownlie, who served as an expert consultant on the recent Panel investigation related to the Kalagala offset. More than 300 people from 17 countries watched the discussion live on YouTube, and another 850-plus later viewed a video of it.

Outreach: While working from home during the COVID-19 pandemic, the Inspection Panel organized and participated in several virtual workshops to inform civil society and community representatives about the Panel's mandate and operations.

From April through June 2020, the Panel conducted virtual sessions in Southern and West Africa and the Middle East and North Africa. It also participated jointly with other independent accountability mechanisms in workshops in Central and South America. All of the sessions were organized in partnership with civil society organizations.

In the fall of 2019, the Panel and Oxfam International co-hosted a session titled "Development and Accountability Challenges in FCV Countries" at the Civil Society Policy Forum during the World Bank Annual Meetings. The session explored the challenges facing development practitioners in countries beset by fragility, conflict and violence, the difficulty in implementing safeguard policies in those countries, and steps that can be taken and the role civil society can play to address those challenges and allow for more effective development.

Also in October 2019, Inspection Panel Member Ramanie Kunanayagam explained the workings of the Panel at workshop for civil society representatives in Sri Lanka and was a panelist at the Dublin Platform for Human Rights Defenders hosted by Front Line Defenders in Ireland.

A month earlier, in September 2019, Ms. Kunanayagam and Senior Executive Assistant Oriana Bolvaran joined representatives from civil society organizations and other independent accountability mechanisms to organize a workshop in Bangladesh for community representatives from five South Asian nations on the mandate and operations of the IAMs.

In July 2019, the Panel organized a discussion titled "The Rights of Indigenous Peoples: A Democratic Republic of Congo (DRC) Case Study" at a side event of the Twelfth Session of the Expert Mechanism on the Rights of Indigenous Peoples. Inspection Panel Senior Operations Officer Serge Selwan led the discussion, which also included Willy Loyombo, who founded two journals that promote the knowledge and expertise of indigenous peoples.

THANKS TO JAN MATTSSON

The Panel wishes to express its thanks to Jan Mattsson, whose five-term as a Panel member ended in November 2019. Jan, who joined the Panel after a long career at the United Nations, played an important leadership role in cases in Kosovo, Armenia and India. The Panel and the Secretariat staff thank Jan for the international perspective and thoughtfulness he brought to our discussions and wish him the very best in his future endeavors.

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