

**MANAGEMENT RESPONSE TO  
REQUEST FOR INSPECTION PANEL REVIEW OF THE  
TANZANIA: RESILIENT NATURAL RESOURCES MANAGEMENT FOR  
TOURISM AND GROWTH (P150523)**

Management has reviewed the Request for Inspection of the Tanzania: Resilient Natural Resources Management for Tourism and Growth (P150523), received by the Inspection Panel on June 20, 2023 and registered on July 20, 2023 (RQ23/02). Management has prepared the following response.

AUGUST 18, 2023



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## ABBREVIATIONS AND ACRONYMS

BP	Bank Procedure
CSO	Civil Society Organization
GDP	Gross Domestic Product
GN	Government Notice
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
IDA	International Development Association
IP	Indigenous Peoples
IPN	Inspection Panel
NGO	Nongovernmental Organization
OP	Operational Policy
PCU	Project Coordination Unit
RAP	Resettlement Action Plan
REGROW	Resilient Natural Resources Management for Tourism and Growth
RPF	Resettlement Policy Framework
RUNAPA	Ruaha National Park
TANAPA	Tanzania National Parks Authority
US\$	United States dollar

## EXECUTIVE SUMMARY

### Project

- i. The ***Tanzania Resilient Natural Resources Management for Tourism and Growth (REGROW) Project*** was approved on September 28, 2017 for a US\$150 million IDA credit to improve management of natural resources and tourism assets in priority areas of southern Tanzania, and to increase access to alternative livelihood activities for targeted communities.
- ii. ***Wildlife-based tourism is a major component of Tanzania's economy.*** Most of the tourism is centered around a country-wide system of national parks and reserves. The World Economic Forum's Travel and Tourism Competitiveness Index (2019) ranks Tanzania 1<sup>st</sup> in Africa and 12<sup>th</sup> worldwide for the quality of its nature-based tourism resources. Tourism has been Tanzania's largest foreign exchange earner since 2012, and in 2019 it accounted for over one-quarter of the country's foreign-exchange earnings. By 2019, Tanzania's tourism sector contributed an estimated 17 percent of GDP and directly employed over 850,000 Tanzanians, making it the country's second-largest component of GDP and third-largest source of employment. Since the tourism value chain is linked to numerous other economic sectors, it plays an outsized role in growth, employment, and poverty reduction.
- iii. ***The REGROW Project specifically seeks to address some of the key challenges of Tanzania's "Southern Circuit" (i.e., in the southern part of the country) to realize its tourism potential.*** These challenges include limited infrastructure inside protected areas, coupled with environmental degradation, insufficient linkages between tourism and rural development, and climate change impacts. The REGROW Project seeks to tackle these challenges through investments in key infrastructure and bridging the gap between conservation and sustained economic benefits for Tanzanians. It seeks to enable communities in the Project area to enhance their incomes by linking them with resilient livelihoods, while helping reduce human-wildlife conflict.

### Request for Inspection

- iv. The Request for Inspection was submitted by two individuals from Tanzania on June 20, 2023. The Requesters have asked the Inspection Panel to keep their identities confidential.
- v. The Request alleges a number of serious incidents which occurred during confrontations between government agencies and the local communities, which it attributes to the REGROW Project. The allegations include pressures on the communities to leave their claimed ancestral land, through: (a) the threat of forced evictions, (b) extrajudicial killings, and (c) livelihood restrictions in the form of cattle seizures.

## Management's Response

- vi. ***In Management's view, the allegations raised in the Request for Inspection are matters that are not related to compliance with Bank policy under the REGROW Project.*** While Management is very concerned about the serious nature of the allegations, it considers that there is no basis for the Requesters' assertion that the alleged harm is related to Bank compliance with its policies and procedures, as required by the Inspection Panel Resolution. Instead, in Management's view, the Requesters' reports of abuse relate to issues and concerns that arise outside the scope of the Project, and which are, therefore, beyond the scope of the Bank's environmental and social safeguards and other policies.
- vii. ***The Request concerns the ongoing conflicts between pastoralist communities and nature conservation efforts undertaken by the Government of Tanzania. These conflicts are longstanding and widespread. They also predate the REGROW Project by decades and go well beyond the Project area.*** At the core, the Request highlights the communities' desire to settle and graze within the protected areas, which the Government has prohibited by law. Management has been aware of these conflicts since the project design phase and, although they are not attributable or related to the Project, the REGROW Project has contemplated some measures, such as a process framework, aimed at helping mitigate their occurrence and severity, as well as assuage the tensions between the Tanzania National Parks Authority (TANAPA) and these national parks' neighboring communities as a result of these legacy issues.
- viii. ***The Request alleges a number of serious incidents which occurred during confrontations between Government agencies and the local communities. However, these confrontations arise from tensions not caused by the REGROW Project and that cannot plausibly relate to a failure of the Bank to comply with its policies in the context of the Project.*** In addition, the Requesters are seeking relief that is not available under the Panel process. The Requesters seek help from the Bank in "holding the Government accountable," in lieu of the "Tanzanian judicial system," which is not within the mandate of the Bank. These allegations cannot be reviewed or addressed further by the Bank and need to be reported to the relevant judicial and administrative authorities in Tanzania.
- ix. ***Management would like to provide the following clarifications on the key issues raised in the Request:***

### *Threat of forced evictions*

- x. ***The threat of evictions described in the Request results from the 2007 extension of the Ruaha National Park (RUNAPA), which predates the REGROW Project.*** The extension is not a result of the Project, nor does the Project require or finance the extension or evictions. No relocation of the communities mentioned in the Request is planned or included under the Project. Moreover, the villages cited in the Request

were already located *inside* protected areas even before the expansion of the Park in 2007.

- xi. ***While the Project does not require or finance the relocation of communities, a Resettlement Policy Framework (RPF) was adopted under the Project as a precautionary measure in the unlikely event that such resettlement would become necessary for construction activities under the Project.*** In addition, a nationwide program to review and harmonize park boundaries is currently being carried out by the Government across the country and independent of the REGROW Project. As agreed by the Government during Project preparation in 2017, any resettlement resulting from this Government review *in the Project area* would follow the RPF, and the Government would prepare site-specific Resettlement Action Plans (RAPs) for the Bank's review and clearance. Management is not aware of any communities having been resettled from the Project area since the inception of this Project nor of any specific plans for relocations, as discussed in the Request.
- xii. ***Management notes that the Government's May 2023 announcement to reduce the Park's size and provide land to local communities residing there may address the Requesters' key concerns.*** The Minister of Natural Resources and Tourism announced plans to issue a new Government Notice (GN) that would alter the boundaries of RUNAPA with the intention of: (a) allocating approximately 34,000 hectares of the park area to local villages/communities for their own use; and (b) removing an additional 900 hectares from the park area for grazing activities. Hence, the upcoming GN may provide clarity with regard to the regularization of villages located inside RUNAPA.

#### *Alleged extrajudicial killings*

- xiii. ***Management is alarmed to learn of the alleged extrajudicial killings and other abuses alleged in the Request.*** On being informed of them, Management immediately met with TANAPA on April 23, 2023 and requested additional information. Management also requested additional information from the Requesters' advisors. While the Bank dispatched a team comprised of social and environmental specialists to the Project sites on April 21–30, 2023 the allegations cannot be investigated or addressed further by the Bank and need to be reported by the affected community members to the relevant judicial and administrative authorities in Tanzania for action, including criminal investigation. Nothing in the Request, in related communications from the Requesters' advisors, in the responses from the Government, or in the Bank's own reviews provides any indication that the abuses alleged in the Request occurred because of the Project, or that they were the result of Bank policy non-compliance.
- xiv. ***The Bank is engaging with the Borrower to request that necessary steps be taken to investigate and address the alleged incidents of unauthorized use of force and extrajudicial killings, with appropriate disciplinary action or referral to the appropriate authorities, if warranted.*** Management notes that the confrontation described in the Request, which is supported by documentation, confirms that a Government

investigation is in progress, focusing on assessing the appropriateness of the TANAPA rangers' conduct.

- xv. ***The Request incorrectly attributes the abuses allegedly carried out by functionaries of Government agencies to the Bank's support for the REGROW Project.*** The linkage alleged in the Request is incorrect, since Bank support for a Borrower's project is limited to defined activities and does not extend to other actions these same Government agencies take, which typically can extend beyond an individual project. In addition, the Request draws no plausible connection between the alleged abuses and the Bank's alleged failure to comply with applicable Bank policies.
- xvi. ***Nevertheless, Management is aware of the broader conflicts around conservation efforts and land use in Tanzania and has taken some actions, within the limits of the Bank's mandate, that are responsive to the Requesters' serious concerns.*** While the Bank is not responsible for the harms alleged, nor in a position to review or ascertain the veracity of the claims raised in the Request—some of which would require criminal investigations by national authorities—the Bank has highlighted through official communication its concerns with the Government and requested that these concerns be reviewed and addressed by the competent national authorities. While beyond the scope of the Project, the Bank has further stressed the need for the Government to adhere to the applicable environmental and social policies applicable under the Project.

#### *Alleged seizures of cattle*

- xvii. ***The alleged seizures of livestock by TANAPA rangers are also unrelated to Bank policy non-compliance; rather, they result from the regular enforcement of Tanzania's national law requirements.*** The REGROW Project did not support the development, application, or enforcement of these laws. Cattle seizures are governed by the laws of Tanzania, and in particular the Wildlife Conservation Act of 2009, which forbids grazing of livestock in National Parks. The law gives park rangers authority to enforce these prohibitions, including through cattle seizures in specific circumstances. Management notes that the seizure of livestock and imposition of fines is governed by Tanzanian law and by the judicial system, and that such fines are not determined by TANAPA or park rangers on their own.

#### *Alleged failure to apply Operational Policy (OP) 4.10*

- xviii. ***The Requesters allege a failure to apply OP 4.10 – Indigenous Peoples under the Project, with which Management disagrees. The Bank's Indigenous Peoples Policy was not applied to this Project because no people qualifying as indigenous under Bank Policy were present in the Project area.*** The policy requires that the people in question have collective and ancestral attachment to the territories and habitats in the Project area. Yet the groups mentioned in the Request (Maasai, Sukuma and Datoga) do not satisfy this criterion, as confirmed by analysis carried out by the Bank during Project preparation. Those groups have been migrating to the RUNAPA area since the 1970s for economic reasons. Accordingly, although these groups may have



ancestral ties to other parts of the country, they do not possess such ties to the territories and habitats in the Project area.

xix. ***In Management's view, the Project has followed the applicable Bank policy requirements to date.*** The Bank is committed to supporting the Government in fully implementing this Project in accordance with the Bank's environmental and social policy requirements. In that context, and within the confines of the Project's scope and the Bank's mandate, the Project will put an additional emphasis on the following activities:

- *Alleged cases of abuse.* The Bank has requested the Borrower to review the alleged incidents of abuse and excessive force to determine if misconduct by park rangers has occurred that requires disciplinary or judicial action. Although deemed unlikely, if any cases are found to be related to the Project, the Bank will take immediate action to address them.
- *Cattle seizures.* The Bank has requested clarification from the Government regarding the lawful application of the provisions that govern cattle seizures, and also whether robust provisions are in place to avoid potential abuse by individual rangers.
- *Resettlement.* Upon release of the upcoming GN, which will set the revised boundaries of RUNAPA and specify whether any resettlements within RUNAPA are indeed envisaged, the Bank will re-confirm with the Government the applicable process prescribed under the RPF, including the Government's agreement to produce site-specific RAPs for the Bank's review and clearance.
- *Process Framework.* The Bank will review the Project's Process Framework and require the Borrower to update its provisions as may be found necessary, including by considering the concerns raised in the Request.
- *Code of Conduct.* The Bank will review the Code of Conduct applicable to RUNAPA rangers and request the Borrower to adopt additional measures if necessary. The Bank will also require that the Borrower ensure that rangers active in the Project area undergo periodic and targeted training based on the Code of Conduct.
- *Grievance Redress Mechanism (GRM).* The Bank will review the GRM's performance and help ensure that communities are aware of the possibility of raising concerns of a confidential nature. Management will require the Borrower to make adjustments, as recommended by the review.

## **Conclusion**

xx. ***Management has carefully reviewed the issues raised by the Requesters and does not agree that any of the alleged harm stems from non-compliance with Bank policy. Management believes that the Bank has complied with policies and***

*procedures applicable to the matters raised by the Request. As a result, Management believes that the Requesters' rights or interests have not been, nor will they be, directly and adversely affected by a failure of the Bank to implement its policies and procedures.*

## I. INTRODUCTION

1. On July 20, 2023, the Inspection Panel registered a Request for Inspection, IPN Request RQ23/02 (hereafter referred to as “the Request”), concerning the Tanzania: Resilient Natural Resources Management for Tourism and Growth Project (P150523) (the “Project”) financed by the International Development Association (the “Bank”).

2. ***Structure of the Text.*** This document contains the following sections: this introduction, followed by Section II, which describes the Request; Section III, which provides background on the Project; Section IV, which discusses issues of pertinence to the Request; and Section V, which contains Management’s response to the Request. Annex 1 presents the Requesters’ claims, together with Management’s detailed responses, in table format. Annex 2 contains a Ministerial Statement to Parliament regarding changes to the boundaries of the Ruaha National Park.

## II. THE REQUEST

3. The Request for Inspection was submitted by two individuals who live in the Ruaha National Park (RUNAPA) area, in Tanzania (hereafter referred to as the “Requesters”). The Requesters asked for confidentiality and authorized the Oakland Institute, a United States-based civil society organization (CSO) to support them.

4. The Request includes three attachments, which Management has received:

- Police Medical report, May 6, 2023;
- Chama Cha Wafugaji Tanzania Report April 2022; and
- Oakland Institute Correspondence with the World Bank REGROW Project team.

No further materials were attached to the Request.

## III. PROJECT BACKGROUND

5. ***The Project.*** The Tanzania: Resilient Natural Resources Management for Tourism and Growth (REGROW) Project (the Project, or the REGROW Project), was approved by the Board of the International Development Association on September 28, 2017 for a US\$150 million credit. The closing date is February 28, 2025. The Project is 63 percent disbursed.

6. **Project Objectives.** The Project Development Objective is to improve management of natural resources and tourism assets in priority areas of southern Tanzania, and to increase access to alternative livelihood activities for targeted communities.

7. **Project Components.** The Project has four components:

- **Component 1 – Strengthen management and improve infrastructure in priority Protected Areas (US\$97 million).** The objective of Component 1 is to improve the management and sustainability of natural resources inside the four priority protected areas in southern Tanzania. This is achieved through infrastructure investments, policy and regulatory support, and capacity/skills development grouped under three sub-components: 1.1 – Improve protected area infrastructure; 1.2 – Strengthen management capacity and infrastructure maintenance of protected areas; and 1.3 – Strengthen “Destination Southern Tanzania.”
- **Component 2 – Strengthen alternative livelihoods for targeted communities in proximity to the priority Protected Areas (US\$17 million).** The overall objective of this component is to provide access to improved economic opportunities to enhance livelihoods, reduce vulnerability to climate shocks, and reduce pressure on natural resources and wildlife. There are three sub-components: 2.1 – Improve the governance framework of conservation-related community-based initiatives; 2.2 – Enhance alternative community livelihoods by improving economic opportunities and linking them with conservation of wildlife and landscapes; and 2.3 – Skills development for local access to jobs in tourism and conservation.
- **Component 3 – Strengthen landscape management and infrastructure investments in and upstream of RUNAPA (US\$27 million).** The component focuses on short-term infrastructure measures for the restoration of dry season flows in the Great Ruaha River, which are critical for continued and expanded tourism in RUNAPA. As a secondary focus, the component lays the groundwork for mitigating future degradation of the RUNAPA resulting from climate change impacts, excessive abstraction of water upstream of the Park, deteriorated water quality, and increased sediment in inflowing rivers, through water controlling structures and water sources protection. The sub-components are: 3.1 – Assess and implement infrastructure measures to augment dry-season flows to the RUNAPA; 3.2 – Improve efficiency of irrigation systems; 3.3 – Catchment conservation activities in selected sub-basins; and 3.4 – Support the consensus-building process for land and water management and climate change adaptation in the Usangu plains.
- **Component 4 – Project management, institutional strengthening, quality assurance and control, and monitoring and evaluation (US\$9 million).** This component finances supplemental support for Project management, to ensure coordinated and timely execution of infrastructure and other Project activities. It includes Project oversight and coordination; establishment and operation of a Project Coordination Unit (PCU); fiduciary management, including external/internal audits and accounting; quality control and assurance systems; environmental and social safeguards management; development and implementation of a communications and

stakeholder engagement plan; and short-term training on Project management. The component will also finance a monitoring and evaluation system.

## IV. SPECIAL ISSUES

### Wildlife Economy in Tanzania

8. ***Wildlife-based tourism is a major component of Tanzania's economy. Most of the tourism there is centered around a country-wide system of national parks and reserves.*** The World Economic Forum's Travel and Tourism Competitiveness Index (2019) ranks Tanzania 1<sup>st</sup> in Africa and 12<sup>th</sup> worldwide for the quality of its nature-based tourism resources. Tourism has been Tanzania's largest foreign exchange earner since 2012, and in 2019 it accounted for over one-quarter of the country's foreign-exchange earnings. By 2019, Tanzania's tourism sector contributed an estimated 17 percent of GDP and directly employed over 850,000 workers, making it the country's second-largest component of GDP and third-largest source of employment. Since the tourism value chain is linked to numerous other economic sectors, it plays an outsized role in growth, employment, and poverty reduction.

9. ***Tourism is key to livelihoods and poverty reduction in Tanzania.*** Women make up 72 percent of all workers in the tourism sector, and household surveys show that households with a member employed in tourism are far less likely to experience poverty than other households.

10. ***National parks in Tanzania have been under stress from poaching for many decades.*** This has had severe impacts on the wildlife and ecosystems within national parks in Tanzania and across Africa, including:

- ***Decline in Wildlife Populations:*** In RUNAPA, the poaching crisis of the late 2000s to early 2010s severely affected the park's elephants. While there were an estimated 32,000 elephants in 2009, the census in 2015 estimated a population of only 15,000, a more than 50 percent decline primarily due to poaching.
- ***Depletion of Iconic Species:*** Black Rhinos (subspecies *bicornis minor*) in the Nyerere National Park ecosystem are almost extinct due mainly to poaching and encroachment.
- ***Loss of Biodiversity:*** The loss of key species through poaching can disrupt the balance of entire ecosystems, affecting other wildlife species and plant communities that depend on them for various ecological interactions, such as seed dispersal or predator-prey relationships.
- ***Increased Security Costs:*** National parks have had to invest significant resources in anti-poaching efforts, including employing rangers, and training and equipping them to combat poachers. According to the Game Rangers Association of Africa, 71 rangers died (many shot by poachers) while performing their duties in various protected areas in Africa in 2022. These threats mean that governments have to enhance security in national parks both for wildlife and tourism.

## Conservation and competing land use

11. ***The conflict between nature conservation and other land uses in Tanzania, such as farming and pastoralism, is a complex and longstanding issue resulting from competing interests and resource needs.*** It involves clashes between conservation efforts aimed at protecting wildlife and their habitats and the traditional livelihoods of communities, who rely on grazing lands for their livestock and land for cultivation of crops, as well as commercial and criminal interests who benefit from illegal encroachment or poaching in protected areas. The causes and consequences of the conflict include:

- *Land Use Competition:* Pastoralists and farmers require large areas of open land for livestock grazing and cultivation, which may overlap with wildlife habitats and protected areas designated for conservation. The resulting competition for land resources can lead to various conflicts over access to and use of these areas.
- *Loss of Habitat.* Competition over land uses creates pressure on wildlife and national parks leading to significant loss of habitats in Tanzania. Encroachment pressure on protected areas in Tanzania has led to the shrinking of wildlife protected areas in favor of other land uses, through de-gazettement, downsizing and downgrading.
- *Predation of Crops and Livestock:* In some cases, wild animals may prey on crops and livestock, causing economic losses to households and communities. This can lead to resentment towards conservation efforts since communities perceive wildlife protection as detrimental to their livelihoods.
- *Restriction of Traditional Practices:* The maintenance of conservation areas often requires the imposition of strict regulations to protect wildlife and the ecosystems in which they live. This can limit pastoralist communities' access to resources, such as water points or habitual grazing lands.
- *Livelihood Insecurity:* Pastoralist communities are vulnerable to environmental changes and droughts, leading to food and water scarcity for both humans and livestock. Conservation areas may limit their ability to cope with these challenges, further exacerbating tensions.
- *Perceived Lack of Benefits:* Some communities may feel excluded from the benefits of tourism revenue generated by conservation efforts, leading to a perception that they bear the costs of conservation without receiving enough of its benefits.
- *Illegal Poaching of Wild Animals:* Poaching is a major risk faced by the protected areas supported by this Project. Some of this hunting is for local consumption and for the very lucrative bushmeat trade. But a growing risk is from well-organized and internationally funded crime syndicates, who target specific species such as elephant, rhinoceros, lion and pangolin, for lucrative luxury and medicinal markets.

12. ***These conflicts have occasionally turned into violent confrontations in Tanzania.***

According to the Government, between March 2022 and February 2023, nine rangers were killed and sixty-eight were injured by civilians. These incidents involved civilians living near protected areas who attacked wildlife and forest rangers with both traditional and modern weapons while the rangers were performing their official duties, such as impounding livestock and arresting poachers found within protected areas. When livestock is seized or citizens are arrested for illegally entering the protected areas, there has been a tendency for citizens to organize and raid the rangers or their camps, attacking them with various traditional weapons such as sticks, spears, machetes, and arrows. These incidents have often resulted in rangers being injured or killed as well as damage to Government property, such as burning of vehicles, houses and equipment.<sup>1</sup>

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<sup>1</sup> [https://www.wwf.or.tz/our\\_news\\_and\\_publications/blogs/climate\\_change\\_driving\\_rising\\_cases\\_of\\_killing\\_of\\_rangers\\_in\\_tanzania\\_by\\_citizens\\_a\\_delicate\\_balance/](https://www.wwf.or.tz/our_news_and_publications/blogs/climate_change_driving_rising_cases_of_killing_of_rangers_in_tanzania_by_citizens_a_delicate_balance/)



## V. MANAGEMENT'S RESPONSE

13. The Requesters' claims, accompanied by Management's detailed responses, are provided in Annex 1.

14. ***In Management's view, the allegations raised in the Request for Inspection are matters that are not related to compliance with Bank policy under the REGROW Project.*** While Management is concerned about the serious nature of the allegations, it considers that there is no basis for the Requesters' assertion that the alleged harm is related to Bank compliance with its policies and procedures, as required by the Inspection Panel Resolution. Instead, in Management's view, the Requesters' reports of abuse relate to issues and concerns that arise outside the scope of the Project, and which are, therefore, beyond the scope of the Bank's environmental and social safeguards and other policies.

15. ***The Request concerns the ongoing conflicts between pastoralist communities and nature conservation efforts undertaken by the Government of Tanzania, as highlighted in Section IV of this report. These conflicts are longstanding and widespread. They also predate the REGROW Project by decades and go well beyond the Project area. At the core, the Request highlights the communities' desire to settle and graze within the protected areas, which the Government has prohibited by law.*** Management has been aware of these conflicts since the Project design phase and, although they are not attributable or related to the Project, the REGROW Project contemplated some measures, such as a Process Framework, aimed at helping mitigate their occurrence and severity, as well as assuage the tensions between the Tanzania National Parks Authority (TANAPA) and these national parks' neighboring communities.

16. ***The Request alleges a number of serious incidents which occurred during confrontations between Government agencies and the local communities. However, these confrontations arise from tensions not caused by the REGROW Project and that cannot plausibly relate to a failure of the Bank to comply with its policies in the context of the Project. In addition, the Requesters are seeking relief that is not available under the Panel process. The Requesters seek help from the Bank in "holding the Government accountable," in lieu of the "Tanzanian judicial system," which is not within the mandate of the Bank.*** These allegations cannot be reviewed or addressed further by the Bank and need to be reported to the relevant judicial and administrative authorities in Tanzania. The allegations include pressures on the communities to leave their claimed ancestral land, through: (a) the threat of forced evictions, (b) extrajudicial killings, and (c) livelihood restrictions in the form of cattle seizures.

17. ***The Request also incorrectly attributes the abuses allegedly carried out by functionaries of Government agencies to the Bank's support for the REGROW Project.*** The linkage alleged in the Request is incorrect, since Bank support for a Borrower's project is limited to defined activities and does not extend to other actions these same Government agencies take, which typically can extend beyond an individual project. In addition, the Request draws no plausible connection between the alleged abuses and the Bank's alleged failure to comply with applicable Bank policies.

18. ***Nevertheless, Management is aware of the broader conflicts around conservation efforts and land use in Tanzania and has, within the limits of the Bank’s mandate, taken some actions that are responsive to the Requesters’ serious concerns.*** While the Bank is not responsible for the harms alleged, nor in a position to review or ascertain the veracity of the claims raised in the Request—some of which would require criminal investigations by national authorities—the Bank has highlighted through official communication its concerns with the Government and requested that they be reviewed and addressed by the competent national authorities.

19. Management would like to respond below in more detail to the specific allegations.

### **Threat of eviction**

20. ***The threat of eviction described in the Request results from the 2007 extension of RUNAPA, which predates the REGROW Project. The extension is not a result of the Project, nor does the Project require or support such an extension or such evictions.*** No relocation of the communities mentioned in the Request is planned or included under the Project. The villages cited in the Request had already been part of RUNAPA since the 2007 expansion, and the Park’s expansion process has not been supported by the Project, which was approved in 2017. It should be noted, in addition, that the areas where the concerned villages are located had been declared protected areas even before the expansion of the Park in 2007.

21. ***Tensions among community members surrounding RUNAPA are decades old and unrelated to the Project.*** The area surrounding the Park includes wetlands of high biodiversity, commercial and hydrological value for local livelihoods and larger-scale agribusiness, as well as for the southern region of Tanzania. In addition, as the land is very fertile, the area has seen an influx of people from other parts of the country since the 1970s. This has led to tensions and conflict over access to land, pasture, and water among farmers, pastoralists, hunters, fishers, on the one side, and conservationists on the other. This has also put pressure on wildlife. Increasingly, competition for resources has led to a rise in encroachment into the adjacent critical habitats and protected areas.

22. ***These conflicts, together with poor implementation of existing land use restrictions, were among the reasons the Government chose to change the conservation status of the area from a reserved wetland and game-controlled area to a national park in 2007.*** The Government charged TANAPA with managing the area’s competing uses and demands. Use of the land had been restricted by law since the 1950s. The game-controlled area was established in 1953 as Utengule Swamps Game-Controlled Area. In 1998, the area was upgraded to Usangu Game Reserve. Then, in December 2007—more than 10 years before the REGROW Project was approved—the Usangu Game Reserve was merged with RUNAPA under Government Notice (GN) #28.

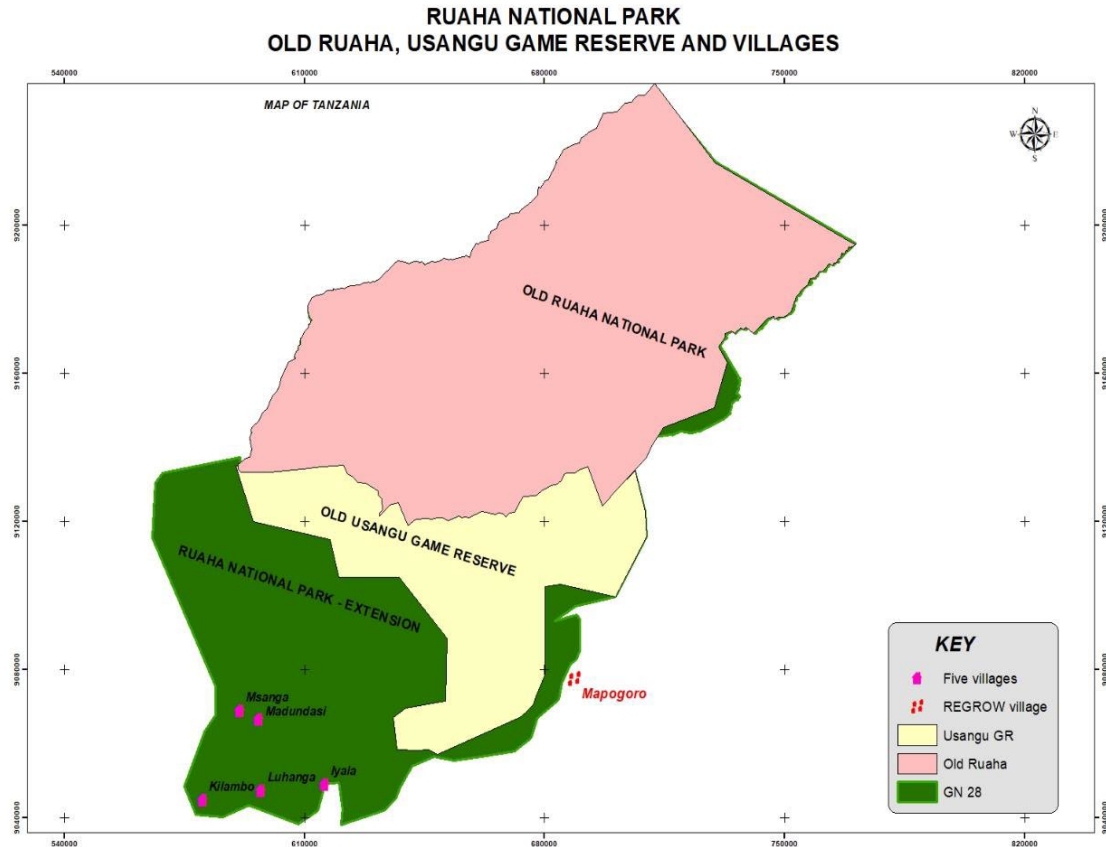
23. ***The laws of Tanzania do not allow people to live within national parks. Therefore, following the 2007 Park expansion, the Government began to resettle communities that found themselves inside the expanded park.*** The relocation and compensation process

started in 2008, and many households moved to different parts of Tanzania. During the relocation process, around 2,000 complaints were raised, alleging insufficient compensation, and the Government suspended the relocation exercise in order to address the complaints. The Government found that 971 complaints were deemed to be valid and additional payments were made to the complainants.

24. Management understands that during a public rally on October 25, 2022, the Minister of Lands, Housing and Human Settlements Development expressed the need to resettle the remaining communities from RUNAPA. However, Management has been advised by the Government that no specific resettlement planning has been finalized, and that such resettlement plans—if any—will be tailored to the new boundaries of RUNAPA once those are set, as explained below in paragraph 26.

### **Resettlement Policy Framework**

25. *While the Project does not require or support the physical relocation of communities, a Resettlement Policy Framework (RPF) was adopted under the Project as a precautionary measure in the unlikely event that such resettlement would become necessary for construction activities under the Project.* The RPF explicitly states that any physical displacement of *settlements* within RUNAPA would fall “*outside the REGROW Project.*” Nevertheless, the Bank agreed with the Government that the RPF would also be applied to resettlement for activities unsupported by the Project if such resettlement occurred in the same geographical area as the Project. In such event, the Government would prepare site-specific Resettlement Action Plans (RAPs) for the Bank’s review and clearance. Management is following up with the Government regarding any planned resettlement process to ensure consistency with the RPF. Management is not aware of any communities having been resettlement from the Project area since the inception of this Project nor of any specific plans for relocations, as discussed in the Request.



Map 1. Ruaha National Park after the expansion in 2007 under GN28, incorporating the game reserve and the park extension. Also shown are the five villages cited in the Request, as well as villages outside the park supported under the REGROW Project.

26. *A nationwide program to review and harmonize park boundaries is currently being carried out by the Government across the country and independent of the REGROW Project. The outcome of this process, which is currently underway, may address many of the Requesters' concerns.* For RUNAPA, the Government stated in May 2023 its intention to reduce the Park's size and provide land to local communities. The Minister of Natural Resources and Tourism stated in a ministerial statement to Parliament (reproduced in Annex 2) that the Government was preparing a new GN that would alter the boundaries of RUNAPA with the intention of (a) allocating approximately 34,000 hectares of the park area to local villages/communities for their own use, (b) removing an additional 900 hectares from the park area for grazing activities, and (c) completing the valuation of citizens' properties in some areas of Mwanavala village so that they could be compensated and resettled. Hence, the upcoming GN may provide clarity with regard to regularization of villages in RUNAPA and to any potential resettlements that may result from that determination, which then would have to be planned and prepared in accordance with the RPF.

27. ***The planned activities to alter boundaries of the Park fall outside the scope of the Project, and further detail will be available once the GN is issued.*** As per the Government’s agreement, the Bank will require the development of site-specific RAPs for any resettlement from the Mwanavala area for the Bank’s review and clearance. To the Bank’s knowledge, no plans have yet been finalized, and no communities have been resettled to date. The Bank has written to the Government to reiterate the process agreed and prescribed under the RPF. The Bank will closely follow up with Government to ensure that if any such resettlement does occur in the future, the RPF is applied.

### **Alleged extrajudicial killings**

28. ***Management is alarmed to learn of the alleged extrajudicial killings and other abuses alleged in the Request. On being informed of them, Management immediately met with TANAPA on April 23, 2023 and requested additional information. Management also requested additional information from the Requesters’ advisors. While the Bank dispatched a team comprised of social and environmental specialists to the Project sites on April 21–30, 2023 the allegations cannot be investigated or addressed further by the Bank and need to be reported by the affected community members to the relevant judicial and administrative authorities in Tanzania for action, including criminal investigation.*** Nothing in the Request, in related communications from the Requesters’ advisors, in the responses from the Government, or in the Bank’s own reviews provides any indication that the abuses alleged in the Request occurred because of the Project, or that they were the result of Bank policy non-compliance.

29. ***The*** Bank is engaging with the Borrower to request that necessary steps be taken to investigate and address the alleged incidents of unauthorized use of force and extrajudicial killings, with appropriate disciplinary action or referral to the appropriate authorities if warranted. Management notes that the confrontation described in the Request, which is supported by documentation, confirms that a Government investigation is in progress and that the investigation is focused on assessing the appropriateness of the TANAPA rangers’ conduct.

30. ***Project Component 1—which is helping to enhance park management capacity—cannot plausibly be linked to the alleged abuses. The Project has neither helped issue regulations permitting an aggressive approach to infractions, nor has the Project funded equipment that would encourage such an approach.*** Component 1 is limited to supporting the provision of basic park monitoring and patrolling equipment (e.g., tents, uniforms, vehicles, binoculars, first aid kits, billhooks) for the four national protected areas under the Project, including RUNAPA. It has not, however, financed the helicopter surveillance cited in the Request.

### **Alleged seizures of cattle**

31. ***The alleged seizures of livestock by TANAPA rangers are also unrelated to Bank policy non-compliance; rather, they result from the regular enforcement of Tanzania’s national law requirements.*** The REGROW Project did not support the development,

application, or enforcement of these laws. Cattle seizures are governed by the laws of Tanzania, and in particular the Wildlife Conservation Act of 2009, which forbids grazing of livestock in National Parks. The law gives park rangers authority to enforce these prohibitions, including through cattle seizures in specific circumstances. To the extent that park rangers contravene applicable Tanzanian law, the appropriate recourse is for the alleged cattle seizure incidents to be reported to the relevant authorities in Tanzania for review and action.

32. Management notes that the seizure of livestock and imposition of fines is governed by Tanzanian law and by the judicial system, and that such fines are not determined by TANAPA or park rangers on their own.

### **Livelihood restrictions**

33. ***The Request incorrectly points to the alleged cattle seizures as evidence that the Project failed in its objective to provide support for the livelihoods of local communities. Of course, the enforcement of penalties, including through cattle seizures, can have an adverse impact on the livelihood of herders.*** However, the Requesters conflate these law enforcement activities, which aim to protect the National Park, with the Project activities aimed at providing economic support to communities outside the Park. The two are unrelated. Cattle grazing in protected areas is prohibited by Tanzanian law, which allows park rangers to seize cattle grazing illegally in some circumstances, by following the applicable legal regulations. The Project's economic livelihood activities are focused on communities living adjacent to the park and do not cover communities living *inside* the park. The Project's objective to support communities' livelihoods does not extend to supporting illegal activities, such as unpermitted grazing in the park.

### **Alleged failure to apply Operational Policy (OP) 4.10**

34. ***The Requesters allege a failure to apply OP 4.10 on Indigenous Peoples under the Project, with which Management disagrees. The Bank's Indigenous Peoples Policy was not applied to this Project because no people qualifying as indigenous under Bank policy were present in the Project area.*** The phrase "Indigenous Peoples" (IP) has a specific meaning under OP 4.10, which includes a requirement that the people in question have collective and ancestral attachment to the territories and habitats in the Project area.<sup>2</sup> Yet the groups mentioned in the Request (Maasai, Sukuma and Datoga) were found not to satisfy this criterion as confirmed by analysis carried out by the Bank during Project preparation. Those groups have been migrating to the RUNAPA area since the 1970s for economic reasons. Accordingly, although these groups have ancestral ties to other parts of the country, they do not possess such ties to the territories and habitats in the Project area. This determination was based on the screening conducted by the Bank in 2016, and confirmed by a Vulnerable Groups Rapid Assessment in 2017. Since OP 4.10 was not triggered, the Project was not required to seek broad community support, as required by

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<sup>2</sup> OP 4.10 – Indigenous Peoples, para. 4(b).

the policy. Nevertheless, the Project did carry out robust consultations of local communities in a culturally appropriate manner.

### **Grievance Redress Mechanism (GRM) and Community Consultations**

35. The Project prepared a stakeholder engagement plan and since February 2020, a total of 222 targeted consultations have been conducted. More than 7,000 people were consulted around RUNAPA between October 2021 and June 2023. These include communities, Water Users Associations, Irrigators Organizations, farmers, livestock keepers, and civil society and nongovernmental organizations (CSOs/NGOs). Consultations have included 3,500 rice farmers from Mbarali District, covering 13 villages.

36. During Project preparation, a Vulnerable Groups screening was conducted to determine whether any of the vulnerable groups met the criteria of OP 4.10 on Indigenous Peoples. These consultations were led by a qualified specialist and consultants with expertise on IPs.

37. ***Field visits and consultations were conducted in three regions: Morogoro, Iringa and Mbeya, which cover the general landscape of the REGROW Project.*** In Morogoro region, four districts' headquarters were visited: Mvomero, Morogoro Rural, Kilosa, and Kilombero. In Iringa region, two districts were visited: Iringa Rural and Kilolo. In Mbeya, Mbarali district was visited. This was then followed by village/hamlet level consultations with the respective village government and representatives from the groups of interest. Consultations in these villages collected information on the history, livelihood, and socioeconomic setting, and any issues raised were recorded.<sup>3</sup>

38. ***The Project has a functioning GRM for receiving Project-related complaints.*** This GRM is known to the communities, and Grievance Redress Committees (GRCs) have been set up. Since the launch of the GRM and training of the GRCs, which took place between June and August 2022, grievances have been received, processed, and resolved. The grievances received to date have concerned leopard collaring,<sup>4</sup> delay of payments to contract workers, and pursuit of local community employment opportunities.

39. ***The Bank team has also been conducting periodic implementation support missions, during which it has consulted local communities and solicited views on the Project.*** Such missions will continue. In addition, Management will set up a dedicated hotline through which community members can contact the Bank team directly, if they so wish.

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<sup>3</sup> These consultations included local Maasai, Sukuma and Datoga community members.

<sup>4</sup> Wildlife collars are used to collect animal location data (GPS) at set time intervals. This data is then received through satellite communication, which allows wildlife authorities to continuously monitor the collared animals, helping to understand their space use, activity patterns, and threats they face, in order to help protect them.

***Bank Management has also raised with the Government the necessity of protecting complainants, victims, and witnesses from any form of threat, intimidation or reprisal.***

The World Bank does not tolerate reprisals and retaliation against those who share their views about Bank-financed projects, as confirmed in the Bank's Commitments Against Reprisals, which is publicly available. The Bank has requested the Government to remind the partners involved in the implementation of the REGROW Project, in particular the implementing authorities, of the importance of this matter. Although not related to the Project, the Bank also notes that the judicial system provides an additional avenue for communities to raise concerns they may have regarding the Government's plans, as illustrated by the claims brought by 852 smallholders before the Tanzanian courts and referred to in the Request. **Actions**

40. ***In Management's view, the Project has followed Bank policy requirements to date.*** The Bank is committed to supporting the Government in fully implementing this Project in accordance with the Bank's environmental and social policy requirements. In that context, and within the confines of the Project's scope and the Bank's mandate, the Project will put additional emphasis on the following activities:

- ***Alleged cases of abuse.*** The Bank has requested the Borrower to review the alleged incidents of abuse and excessive force to determine if misconduct by park rangers has occurred that requires disciplinary or judicial action. Although deemed unlikely, if any cases are found to be related to the Project, the Bank will take immediate action to address them.
- ***Cattle seizures.*** The Bank has requested clarification from the Government regarding the lawful application of the provisions that govern cattle seizures, and also whether robust provisions are in place to avoid potential abuse by individual rangers.
- ***Resettlement.*** Upon release of the upcoming GN, which will set the revised boundaries of RUNAPA and specify whether any resettlement from RUNAPA is indeed envisaged, the Bank will re-confirm with the Government the applicable process prescribed under the RPF, including the Government's agreement to produce site-specific RAPs for the Bank's review and clearance.
- ***Process Framework.*** The Bank will review the Project's Process Framework and require the Borrower to update its provisions as may be found necessary, including by considering the concerns raised in the Request.
- ***Code of Conduct.*** The Bank will review the Code of Conduct applicable to RUNAPA rangers and request the Borrower to adopt additional measures if necessary. The Bank will also require that the Borrower ensure that rangers active in the Project area undergo periodic and targeted training based on the Code of Conduct.
- ***Grievance Redress Mechanism.*** The Bank will review the GRM's performance and help ensure that communities are aware of the possibility of raising concerns



of a confidential nature. Management will require the Borrower to make adjustments, as recommended by the review. In addition, Management will set up a dedicated hotline through which community members can contact the Bank team directly, if they so wish.

## Conclusion

41. ***Management has carefully reviewed the issues raised by the Requesters and does not agree that any of the alleged harm stems from non-compliance with Bank policy.*** Management believes that the Bank has complied with its policies and procedures applicable to the matters raised by the Request. As a result, Management believes that the Requesters' rights or interests have not been, nor will they be, directly and adversely affected by a failure of the Bank to implement its policies and procedures.

42. ***In Management's view, the allegations raised in the Request for Inspection, though very serious, are not related to questions of compliance with Bank policy.*** Management considers that there is no basis for the Requesters' assertion that the alleged harm is related to Bank compliance with its policies and procedures, as required by the Inspection Panel Resolution. Instead, in Management's view, the Requesters' reports of abuse relate to issues and concerns arising outside the scope of a Bank-financed project and which are, therefore, beyond the scope of Bank environmental and social safeguards and other policies. Management reiterates its concern that the Requesters are seeking relief that is not available under the Panel process. The Requesters seek help from the Bank in "holding the Government accountable," in lieu of the "Tanzanian judicial system," which is not within the mandate of the Bank.



ANNEX 1  
CLAIMS AND RESPONSES

No.	Claim	Response
1.	<p>During the implementation of the project, communities living near Ruaha National Park (RUNAPA) - one of the target areas - have been pressured to leave their ancestral land, through the threat of forced evictions, as well as extrajudicial killings, and livelihood restrictions. These have been carried out by the government to force communities away from the area to expand RUNAPA's boundaries and is inextricably linked to the REGROW project.</p>	<p><b><i>The Request concerns the ongoing conflicts between pastoralist communities and nature conservation efforts undertaken by the Government. These conflicts are longstanding and widespread; they predate the REGROW Project by decades and go well beyond the Project area. At the core, the Request highlights the communities' desire to settle and graze within the protected areas, which the Government has prohibited by law.</i></b></p> <p><b><i>Management wishes to make several clarifications regarding statements made in the Request, as follows:</i></b></p> <p><b><i>(i) The Request does not relate to communities living near RUNAPA but rather communities that have settled inside RUNAPA's boundaries as designated by the Government in 2007.</i></b></p> <p><b><i>(ii) The expansion of RUNAPA was decided in 2007—a decade before the REGROW Project—and the REGROW Project does not include support for the Park's expansion process. Hence, the Park expansion cannot plausibly be characterized as “inextricably linked” to the Project, as the Request claims.</i></b></p> <p><b><i>(iii) RUNAPA cannot be described as the “ancestral land” land of the cited groups, since they have only recently migrated into these areas for economic reasons.</i></b></p> <p>Two areas adjacent to RUNAPA (the Utengule Swamps Game-Controlled Area and the Usangu Game Reserve) have had the status of a protected area since before the country's independence, and living in them was prohibited. In 2007, under GN#28, the Government converted both areas to National Park status, bringing these areas into the boundaries of RUNAPA and under the authority of TANAPA. The change was intended to allow better and more consistent management of the protected areas. Both areas contain wetlands of high biodiversity, commercial and hydrological value. They are attractive for local farmers, large-scale agribusiness, and cattle herders, and are essential for water supply and energy for the southern region of Tanzania. The area has seen an influx of people from other parts of the country since the 1970s. The former Game-Controlled Area also has some dryland which is attractive for pasture. Together, these pressures have led to tensions and conflict over access to land, pasture, and water among</p>

No.	Claim	Response
		<p>farmers, pastoralists, hunters, fishers, on the one side, and conservationists on the other.</p> <p>The Government’s RUNAPA extension is not part of the Project. No relocation has been necessary or is planned for Project activities. To support park management and oversight activities, the Project established several provisions to ensure consistency of Government actions with Bank policy. This included (a) an extension of the RPF beyond Project activities to cover any resettlement within the Project area; and (b) a Process Framework to guide TANAPA’s outreach to and engagement with local communities.</p> <p>No relocations are needed for the Project and the Government has not, to the Bank’s knowledge, resettled any communities from the Project area since Project inception. Furthermore, the Government has agreed to follow the Bank’s RPF for relocations that may take place in the Project area within the life of the Project.</p> <p>No restrictions of access are foreseen within the Project. The REGROW project is not designed to enforce existing boundaries or introduce new restriction of access to the PAs. However, through the construction of infrastructure such as additional ranger posts and roads, and provision of equipment, the PA authorities will have better ability to detect illegal uses of resources (illegal tree logging, waste dumping, illegal farming or grazing, etc.). For this reason, a Process Framework (PF) has been prepared, and will, in part, be applied as a precautionary measure to the extent surveillance activities would marginally contribute to increasing existing restrictions of access, with a focus on communities where illegal activities (in particular poaching) are prevalent, which are the ones most likely to be affected.</p>
<b>EVICCTIONS</b>		
2.	<p>The REGROW Resettlement Policy Framework states that the “project, by design, is not expected to cause or influence the need for any kind of resettlement.” Despite this assurance, on October 25, 2022, the Minister of Land, Housing and Housing Development publicly announced that five villages ... and an additional 47 sub-villages from 14 villages will be evicted – with legal registration of the villages cancelled. She warned: “If you continue</p>	<p><b><i>The Request misunderstands the scope of the Project and conflates the Government’s nationwide process to regularize national park borders with activities under the REGROW Project. The planned relocations are not part of the Project, but the Government has agreed to follow the Bank’s RPF for relocations that may take place in the Project area within the life of the Project. The RPF includes provisions for meaningful consultation and the preparation of a RAP prior to any relocations.</i></b></p>

No.	Claim	Response
	<p>to be there and the village is delisted it means you are breaking the law.” These villages fall within the REGROW project area as they are adjacent to RUNAPA.</p> <p>This has led to confusion and fear among the communities in the impacted villages regarding the evictions, which are reportedly due to imminently begin. In response, 852 smallholder farmers from Mbeya have filed a case in the High Court of Tanzania at Mbeya as they seek to stop the government’s plans to evict them from their land. Critically, the government did not follow the steps required by the World Bank, including to “prepare and implement a Resettlement Action Plan (RAP), subject to World Bank review and clearance.” The World Bank’s failure to ensure meaningful consultations with affected communities and the lack of preparation of the Resettlement Action Plan (RAP) could cause significant harm due to physical and economic displacement of the affected communities. The forced evictions, which were planned under severe retaliation threats, have created a sense of constant fear and are likely to inflict considerable harm to the affected community members.</p>	<p>The Government agreed to apply the RPF to resettlement for activities unsupported by the Project if such resettlement occurred in the same geographical area as the Project. The Bank agreed to review and provide comments on any RAP that the Government would produce in such circumstances.</p> <p>The Government’s October 2022 announcement cited in the Request relates to the Government’s plans to implement the 2007 GN bringing two protected areas into RUNAPA. As discussed above, those activities are not part of or induced by the Project. In addition, as explained above, housing and other human activities in this area had been restricted by law since before the country’s independence.</p> <p>In sum, the conversion of two protected areas to National Park status was neither required nor supported or financed by the Project. Still, although beyond the scope and footprint of the Project, the Government agreed to apply Bank standards to address any legacy resettlement.</p> <p>The Project has not received any other complaints related to the actions in the Request. The Project has a functioning GRM for receiving Project-related complaints. This GRM is known to the communities, and GRCs have been set up. Since the launch of the GRM and training of the GRCs that took place between June and August 2022, grievances have been received, processed, and resolved by it. The grievances received to date have concerned leopard collaring, delay of payments to contract workers, and pursuit of local community employment opportunities.</p>
<b>EXTRAJUDICIAL KILLINGS &amp; HUMAN RIGHTS ABUSES</b>		
3.	<p>It is alleged that over the past few years, park rangers have been responsible for several extrajudicial killings of villagers living adjacent to RUNAPA. The REGROW Implementation Status &amp; Results Report from December 2022 indicates that “the Project continues to enhance park management capacity and measures and has provided equipment that are being used for patrols...” As such the ranger force allegedly responsible for extrajudicial killings receives direct support from the project.</p>	<p><b><i>Management is alarmed to learn of the extrajudicial killings and other abuses alleged in the Request. On being informed of them, Management immediately met with TANAPA on April 23, 2023 and requested additional information. Additional information was also requested from the Requesters’ advisors.</i></b></p> <p><b><i>While the Bank dispatched a team comprised of social and environmental specialists to the Project sites on April 21–30, 2023 the allegations cannot be investigated or addressed further by the Bank and need to be reported by the affected community members to the relevant judicial and administrative authorities in Tanzania for action, including criminal investigation. Nothing in the Request, in related communications</i></b></p>

No.	Claim	Response
		<p><i>from the Requesters' advisors, in the responses from the Government, or in the Bank's own reviews provides any indication that the abuses alleged in the Request occurred because of the Project, or that they were the result of Bank policy non-compliance.</i></p> <p>The Bank has received no reports of assaults or murder other than in the Request and related communications. The Bank has tried to obtain further information, including through Project missions, consultations with local communities and communications with the Requesters' advisors. The Project team has followed up with the PCU and interacted widely with communities around RUNAPA during the November 2022 and April 2023 missions, and no allegations of threats, intimidation, extra-judicial killings, retaliation, or any other violence have been received, nor have such reports been found by our media scanning.</p> <p>Any abuses by Government officials, if substantiated, would be subject to relevant national review and legal enforcement, but such review and enforcement fall outside the scope of the Bank's mandate. Rangers are required to follow TANAPA's Code of Conduct, which governs the use of force and includes sanctions for any misconduct.</p> <p>Under Component 1, the Project has supported provision of basic park monitoring and patrolling equipment (e.g., tents, uniforms, vehicles, binoculars, first aid kits, flashlights, sleeping bags, night vision goggles, water bottles, headlights, raincoats, and mobile mapper, billhooks) for the four national protected areas under the Project, including RUNAPA. It has not, however, financed the acquisition of any weapons or any helicopter surveillance.</p> <p>Notwithstanding the above, in an effort to respond to the Requesters' concerns, Management intends to continue to engage with the Government to ensure that rangers active in the Project area undergo periodic and targeted training based on the applicable Code of Conduct and legal requirements.</p>
4.	<p>On April 23, 2021, RUNAPA rangers reportedly shot and killed a fisherman named [red.]. The same day, rangers allegedly killed two herders, [red.] (25) and [red.] (14). Member of Parliament (MP) for Mbarali, [red.], called for investigation into the involvement of RUNAPA rangers in these murders as</p>	<p>Should these allegations be substantiated, they should be reported to the relevant authorities in Tanzania for review and action, as appropriate in accordance with GN#590, which governs the conduct of TANAPA rangers.</p>

No.	Claim	Response
	<p>well as the circumstances of the death of [red.] (32) and the disappearances of [red.] and [red.]. A report compiled by the community organization Chama Cha Wafugaji Tanzania (CCWT) in April 2022 documented these killings in addition to naming six additional murders allegedly committed by RUNAPA rangers since 2017 (see attached).</p>	
5.	<p>On May 6, 2023, a helicopter carrying six Tanzania National Parks Authority (TANAPA) armed rangers made a surprise landing in [red.] village in the Mbarali district of Tanzania. Three Maasai women were brutally assaulted by the rangers. On May 11, 2023, the Mbarali MP [red.] alerted the Tanzanian National Assembly of these events and detailed the severity of the situation. According to Mr. [red.], “They [TANAPA rangers] burnt a bush knife. When it got hot, they beat them with it. They peel the whole body with it. They were beaten and tortured badly.”</p>	<p><b><i>The Bank is not in a position to verify the accuracy of the statements. A forensic investigation of the incidents would be required, which is outside the mandate of the Bank and is solely the responsibility of the national authorities.</i></b></p> <p>The following background on this incident is included for further context only. A Member of Parliament reported these allegations to the House and requested immediate follow up by the Government. The Government investigated this incident and issued a ministerial statement to Parliament on May 15, 2023 which determined that:</p> <ul style="list-style-type: none"> <li>- Rangers landed at Mwanavala village (which is 20km inside RUNAPA) as part of a regular patrol. The rangers encountered herders with livestock and attempted to apprehend them, leading to a confrontation in which both rangers and herders were injured. No assets were seized. All injured citizens were taken to hospital and received treatment, which was covered by TANAPA;</li> <li>- There is no proof of women being stripped of their clothes by the rangers as stated in Parliament by the Honorable Member of Parliament;</li> <li>- In accordance with the Wildlife and Forest Conservation Service General Orders 2021 (GN#590), the conduct of the rangers involved in this incident is currently under investigation by the Police.</li> </ul>
<b>CATTLE SEIZURES</b>		
6.	<p>The REGROW Project Information Document states that the “Project will assist the GOT in addressing rural poverty which has been persistent in and around the country’s parks and game reserves.” Towards this goal, a component of the project is devoted to</p>	<p>Component 2 of the REGROW Project is focused on strengthening alternative livelihoods for targeted communities in proximity to the four priority protected areas via (a) improving the governance framework of conservation-related community-based initiatives (such as cultural tourism, capacity building, outreach), (b) enhancing alternative community livelihoods by</p>

No.	Claim	Response
	“enhancing local economic benefits from tourism.”	improving economic opportunities and linking them with conservation of wildlife and landscapes, and (c) skills development for local access to jobs in tourism and conservation.
7.	<p>Over the past two years, instead of supporting communities living adjacent to protected areas, government agencies have been seizing cattle in large numbers and auctioning off the animals to the severe detriment of pastoral livelihoods. Given the critical role cattle play in the livelihoods of pastoralists, these seizures have decimated families economically and are being done to force pastoralists to find alternative livelihoods or leave the area entirely. In September 2022, RUNAPA’s Assistant Conservation Commissioner, [red.] openly admitted: “We have captured 12,758 cattle in the park in year 2021/2022,” and that “We collected over TShl.2 billion... [pastoralists] pay these fines very fast. They could bring loads of money if we told them to.”</p>	<p><b><i>The Request conflates Project activities aimed at providing economic support to communities outside the Park with law enforcement activities to protect the Park, which have an adverse impact on illegal economic activities. The two issues are unrelated. In any event, cattle seizures in and of themselves are not evidence of Bank policy non-compliance. Cattle grazing in protected areas is prohibited by Tanzanian law, and national law allows park rangers to seize cattle engaged in illegal grazing in some circumstances.</i></b></p> <p>Cattle seizures are governed by the laws of Tanzania, and in particular the Wildlife Conservation Act of 2009, which forbids grazing of livestock in National Parks. The Act gives rangers authority to enforce these prohibitions, including through cattle seizures in some circumstances. Rangers are mandated under the Act to apprehend any poacher or cattle grazer in the park and are authorized to pursue legal action by transferring suspects to the regular police for prosecution. Their actions are governed by GN#590, which covers the use of force and sanctions for any violations. To the extent that rangers contravene Tanzanian law, the alleged cattle seizure incidents are reported to the relevant authorities in Tanzania for review and action, as appropriate.</p> <p>The seizure of livestock and Imposition of fines is governed by Tanzanian law and by the judicial system—fines are not determined by TANAPA or park rangers on their own.</p> <p>The Project <b>does</b> support livelihoods of nearby communities living outside the park. As of June 2023:</p> <ul style="list-style-type: none"> <li>- 522 students (326 men and 196 women) from Ruaha, Udzungwa, Nyerere, and Mikumi villages have been awarded scholarships and enrolled in conservation- and tourism-related courses at various colleges in the country.</li> <li>- Start-up and capitalization of 162 community conservation groups, with 3,158 members (835 men and 2,323 women) in 15 initial villages. These groups are engaged in various income-generating activities (livestock fattening, bee keeping, poultry farming, cultural tourism, rice farming, etc.).</li> </ul>



No.	Claim	Response
		<ul style="list-style-type: none"> <li>- Improvements in irrigation schemes in Mbarali District.</li> <li>- Support for employment by contractors of local community members in ongoing subprojects under the REGROW Project.</li> <li>- Support for regularization of tenure for local communities through acquisition of collective Certificates of Customary Right of Occupancy.</li> </ul>
8.	<p>During the aforementioned TANAPA ranger violence in [red.] and [red.] on May 6, 2023, rangers also seized 250 cattle from a pastoralist, under the false pretense the cattle were encroaching on the nearby RUNAPA. This seizure is contrary to the Bank’s claims all seizures have been done within RUNAPA. The rangers soon confronted another pastoralist, who would not allow his cattle to be taken. In response, he was severely beaten, suffering a large cut on his head that required hospitalization. A police medical report that specifically notes rangers were responsible for the attack is attached.</p> <p>Testimony of MP [red.] detailing the violence and cattle seizure on May 6, 2023, is available here:  <a href="https://www.youtube.com/watch?v=k6tZCo4ZVIg">https://www.youtube.com/watch?v=k6tZCo4ZVIg</a></p>	<p><b><i>As noted in Box 7, allegations of cattle seizures do not in and of themselves indicate Bank policy non-compliance, because cattle grazing in national parks is unlawful and the Project does not focus on cattle grazing specifically. In addition, to the extent that the Request alleges cattle seizures or ranger patrols outside the national park, these activities fall outside the scope of the Project.</i></b></p> <p><b><i>Moreover, as noted above, the Government investigated this incident and issued a ministerial statement to Parliament on May 15, 2023. The investigation determined that the incident occurred in the course of regular patrols by park rangers, and that no livestock were confiscated. As noted above, the incident is currently under investigation by the police, in accordance with the Wildlife and Forest Conservation Service General Orders 2021 (GN#590).</i></b></p>
9.	<p>Several large cattle seizures from September to December 2022 alone include:</p> <ul style="list-style-type: none"> <li>- September 14-24, 2022-- 3.492 cattle were seized in an 11-day period, allegedly for grazing within the Ihefu wetlands. Owners were forced to pay fines for the return of their cattle.</li> <li>- November 22, 2022-- RUNAPA rangers seized 172 cattle in Mbarali district, belonging to [red.]. Even though Mr. [red.] showed up and the Mbarali district court issued an injunction stating that the cattle should not be auctioned off, the</li> </ul>	<p><b><i>Again, cattle seizures do not necessarily indicate Bank policy non-compliance, because cattle grazing in national parks is unlawful. Fine amounts for the return of cattle are set by the Tanzanian courts, not by the park rangers, TANAPA, or the Project.</i></b></p> <p>The Project GRM has not received any complaints relating to cattle seizures.</p> <p>The Project does not participate in Government law enforcement activities, other than equipping rangers with basic equipment to support park oversight and management activities.</p>

No.	Claim	Response
	<p>cattle were still sold.</p> <ul style="list-style-type: none"> <li>- December 2, 2022-- 93 cattle from [red.] village (located south of RUNAPA) belonging to two pastoral families were auctioned off with the permission of the Mbarali district court.</li> <li>- December 7, 2022-- Rangers captured 293 cattle including 280 belonging to [red.] a [red.] in [red.] informed the [red.] Village Executive Officer about seizure of his cattle and hired an advocate. On December 12, 2022, the court ordered him to pay a fine and get back his animals.</li> <li>- December 19, 2022-- Rangers captured 140 animals at [red.] area within RUNAPA. Despite attempts of the owner to pay to reclaim his animals, on December 22, 2022, the district court ordered the 138 animals to be auctioned as unclaimed.</li> </ul> <p>During these seizures, pastoralists reported extreme cruelty practiced by the rangers in some cases. A pastoralist in Mbarali district detailed his experience with a cattle seizure to our research team.</p> <p>“Rangers captured my herd of cattle on September 21, 2022. The rangers assaulted me badly. I, as the owner of the animals, had no option but to follow the impounded livestock. I was severely beaten. I felt like dying. They forced me to cut and pull thorny branches and make a cattle holding corral. Then I was forced to stare at the very hot sun. The animals were also tortured. They did not eat or drink water for six days. Those were severe punishments.”</p>	
<b>PREVIOUS CONTACT/BANK RESPONSE</b>		
10.	On April 5, 2023, the Oakland Institute sent a letter to several World Bank staff members* sharing the concerns detailed	<i>Far from dismissing the Oakland Institute’s allegations, the Bank promptly acknowledged receipt</i>

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	<p>in section 1 and requested information on what steps would be taken in response (see attached). On May 18, 2023, the World Bank shared the outcome of their field mission visit. In their response, the World Bank task team completely failed to take responsibility for the abusive actions enabled by the government's funding and did not indicate any further action to be taken. Below, we have included details of a rebuttal that was sent to the World Bank on May 30, 2023 in response to the May 18, 2023 communication.</p>	<p><b><i>of the letter from the Requesters' advisors and began investigating the allegations in relation to the Project.</i></b></p> <p>The complaint was referred to and registered with the Bank's corporate Grievance Redress Service. The issue was elevated to Management and addressed with diligence. The Bank responded to the issues raised by the Oakland Institute based on the facts available from the Project's GRM, Project implementation support activities, missions and public reports. The Bank undertook a field mission in April 2023, in which it investigated the issues raised in the Oakland Institute's letter. The Bank's response to Oakland Institute also included new information that the Bank team had sought and received from the Government relating to the complaint.</p> <p>The Bank's response indicated that the team would continue to monitor and supervise the Project's compliance with the relevant requirements of the Bank's environmental and social safeguard policies applicable to the Project, and actions to deepen awareness of the GRM for communities in the Project areas.</p> <p>The Bank also invited Oakland Institute to share further information to allow the Bank to continue to raise specific issues with the Government.</p>
11.	<p>Evictions. First, as mentioned previously, the government publicly announced on October 25, 2022, that it will carry out evictions to allow for the expansion of the Ruaha National Park (RUNAPA). The Bank replied, "to the extent that the government is pursuing evictions for purposes of extending park boundaries, such activities would fall outside the scope of the Project." The Bank attempted to justify these evictions by claiming: "The extension of the RUNAPA boundaries was approved by the National Assembly on November 14, 2007 and was assented to by the President of Tanzania on December 15, 2007, through Proclamation Government Notice (GN) number 28. This extension decision predates the World Bank-supported Project." The World Bank, through REGROW, provides direct material support to the government for management of</p>	<p><b><i>See response in Box 2 above. The Park extension process is not part of the Project. Nor do Project activities require or involve any involuntary resettlement. To the Bank's knowledge, no communities have been relocated from the Project area to date. The Government has agreed to follow the Bank's RPF for relocations that may take place in the Project area within the life of the Project.</i></b></p> <p>The Government plans are still evolving. In May 2023, the Minister of Natural Resources and Tourism stated in a ministerial statement to Parliament (Annex 2) that the Government was finalizing a new GN that would alter the boundaries of RUNAPA with the intention of (a) allocating approximately 34,000 hectares of the park area to local villages/communities for their own use, (b) removing an additional 900 hectares from the park area for grazing activities, and (c) completing the valuation of citizens' properties in some areas of Mwanavala village so that they could be compensated and resettled. The planned activities to alter boundaries of the Park fall outside the scope of the Project, and further detail will be available once the GN is issued.</p>

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	<p>RUNAPA as well as policy and institutional support. The government’s announced evictions are set to occur to expand RUNAPA, working towards the REGROW Project goal of improving tourism assets in priority areas of Southern Tanzania. The fact that the government has a history of attempting to cancel the legal registration of villages in order to expand RUNAPA does not clear the World Bank of responsibility. Instead, this should have triggered internal alarms that implementing the REGROW Project near RUNAPA could result in evictions taking place that would devastate thousands of livelihoods during the Project. Since the initial announcement in 2007, the evictions had been tabled. In 2020, former President Magufuli called GN 28 a “a serious blunder” and promised that “this will never happen.” However, Magufuli did not cancel GN No. 28 and died with his promise in March 2021.</p>	
12.	<p>RAP. The October 25, 2022 eviction announcement therefore shocked the impacted villages. Crucially, these eviction plans were renewed during the REGROW project are within the project area. Consequently, the government should be “obliged to submit a Resettlement Action Plan (RAP) for the World Bank’s review and approval,” as prescribed by the REGROW Resettlement Policy Framework. The Tanzanian government’s failure to do so, as well as the Bank’s decision to not uphold this requirement, is a blatant violation of the Bank’s own safeguards. Furthermore, it makes the Bank’s commitment to address systematic failures in preventing forced displacements, an empty promise.</p>	<p><b><i>See response in Box 2.</i></b></p> <p><b><i>The Park extension process is not part of the Project, nor do Project activities require or involve any involuntary resettlement.</i></b></p> <p>Management understands that during a public rally on October 25, 2022, the Minister of Lands, Housing and Human Settlements Development expressed the need to resettle remaining communities from RUNAPA. However, Management has been advised by the Government that no specific resettlement planning has been finalized, and that such resettlement plans—if any—will be tailored to the new boundaries of RUNAPA once those are set.</p> <p><b><i>No resettlement of communities from the Project—which would require the production of a RAP for the Bank’s review and clearance—has taken place to date to the Bank’s knowledge. Hence the non-compliance alleged in the Request is incorrect.</i></b></p>
13.	<p>Grievance Mechanism. Third, the Bank claimed the grievance mechanism has not received any complaints related to</p>	<p><b><i>The Request states that the smallholder farmers went directly to the High Court and did not turn to the Project’s GRM. Hence, this cannot serve as evidence</i></b></p>

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	<p>the aforementioned allegations. This ignores that 852 smallholder farmers from the aforementioned villages facing eviction have filed a case in the High Court of Tanzania at Mbeya, to stop the government’s plans to evict them from their land.</p>	<p><b><i>that the GRM is not working effectively, but illustrates the fact that the complainants have multiple avenues to raise their concerns and have chosen to go directly to court.</i></b></p> <p>The REGROW Project has a functioning GRM for receiving Project-related complaints, which has been widely promoted and communicated in the villages in the Project area. Local GRCs have been set up.</p> <p>The GRM to date has not received any complaints related to the allegations in the Request. As discussed above, the grievances received to date have concerned leopard collaring, delay of payments to contract workers, and pursuit of local community employment opportunities. The Requesters refer to cases before the Tanzanian courts, but cases before national courts are not automatically referred to Bank project GRMs. That is because not all such judicial claims are Project-related, and GRMs are not intended to be a substitute for national judicial processes.</p> <p>When the Bank received the letter from Oakland Institute, it reviewed the High Court case mentioned in the letter and found that the case does not indicate a failure of the Bank to comply with applicable policies.</p>
14.	<p>Extrajudicial killings. Fourth, the World Bank task team recommended that the “alleged incidents of extrajudicial killings should be reported to the judicial authorities for review and action.” This incorrectly assumes that the Tanzanian judicial system is capable of holding the government accountable. To date, despite numerous court cases filed against the government - related to forced evictions in the name of conservation, for instance in Loliondo and the Ngorongoro Conservation Area, the courts have failed to provide redress or justice to communities. Additionally, the government has demonstrated a blatant disregard for regional human rights mechanisms, as evidenced by Tanzania’s withdrawal from the African Court on Human and People’s Rights in 2019.</p>	<p><b><i>See response in Box 3. The Requesters appear to be seeking relief that is not available under the Panel process. It is not the within the mandate or role of the Bank, nor that of the Panel, to “hold the Government accountable” for alleged unlawful activity, in lieu of national courts or regional legal bodies.</i></b></p>
15.	<p>Relationship to project. Fifth, the Bank attempts to distance itself from the alleged abuses committed by TANAPA</p>	<p><b><i>See response in Box 3. The Request appears to impute to the Bank responsibility for all acts that Government counterparts might take no matter the relationship of</i></b></p>

No.	Claim	Response
	<p>by asserting that the project’s involvement is limited to “providing materials and equipment for monitoring and patrolling, specifically for wildlife monitoring. None of the materials or equipment include weapons, firearms, or similar items.” This completely disregards the Bank’s support to and close partnership with TANAPA - the agency responsible for overseeing the “implementation and supervision, as well as the construction and operation of project activities.” The actions of TANAPA cannot be ignored merely by claiming that the project did not finance its weapons given it does provide other important material support to those responsible for the abuses.</p>	<p><i>these acts to Project activities. This is not an appropriate basis on which to consider Bank policy compliance. Abuses by Government officials, if substantiated, of course would be subject to relevant national review and legal enforcement, but such review and enforcement fall outside the scope of the Bank’s mandate.</i></p>
16.	<p>Cattle seizures. Sixth, regarding the cattle seizures reported, the task team responded that “to the World Bank’s knowledge, the rangers’ work under the Project is conducted only within park boundaries.” This claim is contrary to the aforementioned May 6, 2023, TANAPA seizure of 250 cattle in [red.] village, outside of RUNAPA’s boundaries. The Bank also stated that “to the extent that park rangers contravene applicable Tanzanian law, the alleged cattle seizure incidents should be reported to the relevant authorities in Tanzania. ” As TANAPA rangers are perceived as law enforcement by communities near RUNAPA, villagers are very unlikely to risk reporting abuses and illegal seizures to TANAPA itself or other agencies, given fear of retribution.</p>	<p><i>As explained in Box 7, cattle grazing in protected areas is prohibited by Tanzanian law, and national law allows park rangers to seize cattle that pastoralists have illegally allowed to graze in some circumstances.</i></p> <p>To the extent that park rangers contravene applicable Tanzanian law, the alleged cattle seizure incidents should be reported to the relevant authorities in Tanzania for review and action, as appropriate. Management notes that the community has sought to resolve some of these grievances in the Tanzanian courts.</p> <p>Management takes allegations of retaliation very seriously and has advised the Government that retaliation in Bank-financed projects will not be tolerated. Moreover, the Bank team periodically engages with community members in the context of implementation support missions, during which community members are free to express their concerns to the Bank directly. To date, they have not communicated to the Bank any concerns related to the allegations in the Request.</p>
17.	<p>Bank relationship with Member country government. Finally, the response declared that “the World Bank’s mandate does not extend to overseeing the conduct of Member countries’ government agencies or to intervening in the event of alleged wrongdoing unrelated to a World Bank-financed</p>	<p><i>The Bank’s May 19, 2023, letter to the Oakland Institute correctly stated the scope and limits of the Bank’s mandate. The World Bank’s mandate does not extend to policing the conduct of Member countries.</i></p> <p><i>The repeated claim by Oakland Institute that the allegations are “inextricably linked” to the Project overlooks the scope of the Project, the sequence of</i></p>

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	<p>project.” The World Bank is a major financial supporter of the Tanzanian government and through the REGROW project, is working towards increasing tourism in the Southern Circuit. The evictions, extrajudicial killings, and livelihood restrictions that we detailed are being carried out by the government to force communities away from the area to expand RUNAPA. This is without question inextricably linked to the REGROW project.</p> <p>The Bank’s response raises concerns about the accuracy of its assessment of the situation on the ground, as well as about the comprehensiveness of the inquiry itself.</p>	<p><b><i>events regarding the extension of the Park, and the explanations provided in Boxes 1-7.</i></b></p> <p>The Bank’s assessment of the situation is consistent with its policy obligations and commensurate with its mandate. As previously communicated, Management welcomes any specific information that the Requesters or others may wish to provide, which would help the Bank raise specific Project-related issues with the Government for review and clarification.</p> <p>Should evidence emerge showing the Government’s non-compliance with its obligations under the financing agreement, the Bank would consider appropriate action, including applicable remedies.</p>
18.	<p>Perceived policy violations. The aforementioned forced evictions, set to occur without meaningful consultation and disclosure of project documents, violate the following World Bank operational policies:</p> <ul style="list-style-type: none"> <li>• Environmental Assessment (OP/BP 4.01)</li> <li>• Physical Cultural Resources (OP/BP 4.11)</li> <li>• Involuntary Resettlement (OP/BP 4.12)</li> <li>• Natural Habitats (OP/BP 4.04)</li> <li>• Forests (OP/BP 4.36)</li> </ul> <p>The failure of the World Bank to comply with these operating procedures has led to direct harms against communities living adjacent to RUNAPA. Additionally, the planned evictions, incidents of violence and cattle seizures have impacted several Indigenous groups, including Maasai, Sukuma and Datoga pastoralists, who inhabit the project area. Despite this, the Bank failed to trigger its policy on Indigenous Peoples, causing irreparable harm to the identity, culture, and rights of the Indigenous community in the project area. No free, prior, informed</p>	<p><b><i>The Request has not alleged any plausible non-compliance with the Operational Policies/Bank Procedures (OP/BP) listed in the Request (OP/BP 4.01, OP/BP 4.11, OP/BP 4.12, OP/BP 4.04, and OP/BP 4.36). The Request concerns the ongoing tensions between pastoralist communities and nature conservation efforts undertaken by the Government. These tensions are longstanding and widespread; they predate the REGROW Project by decades and go well beyond the Project area.</i></b></p> <p>Project supervision since effectiveness has confirmed that the requirements of OP/BP 4.01, OP/BP 4.11, OP/BP 4.12, OP/BP 4.04, and OP/BP 4.36 have been met throughout the implementation of various activities. To date, the Project has prepared six Implementation Status Reports, all of which have had environmental and social ratings of Moderately Satisfactory or Satisfactory. No environmental and social issues have been raised to Management.</p> <p><b><i>The Project did not trigger the Indigenous Peoples Policy (OP4.10), because no IPs as defined by the Policy were present in the Project area. The phrase “Indigenous Peoples” has a particular meaning under OP 4.10 paragraph 4, which includes a requirement that the people in question have collective and ancestral attachment to the territories and habitats in the Project area. Yet the groups mentioned in the Request were found not to have collective attachment to the Project area because they had migrated to the RUNAPA area in the 1970s and later for economic</i></b></p>

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	<p>consultations were conducted with the affected Indigenous communities in the project area.</p>	<p><i>reasons. This determination was based on a screening conducted by a World Bank Social Development Specialist during a field visit in 2016 and confirmed by a Vulnerable Groups Rapid Assessment in 2017. (Note that the Assessment focuses on the Maasai and Barbaig. The Barbaig are the largest family in the Datoga. The Sukuma are not considered IP in Tanzania as they do not meet the conditions of OP 4.10.) The Project Decision Meeting endorsed this conclusion. The decision is summarized in the 2017 Environmental and Social Management Framework, RPF, Process Framework and the Project Appraisal Document, as recommended in the Vulnerable Groups Assessment.</i></p> <p>Because there were no IP groups, and OP 4.10 was not triggered, the Project was not required to carry out free, prior, and informed consultations leading to broad community support. Nevertheless, it did carry out robust consultations in a culturally appropriate manner. The Project prepared a stakeholder engagement plan and since February 2020, 222 targeted consultations have been conducted. While there was a pause in community interactions during COVID-19, more than 7,000 people were consulted around RUNAPA between October 2021 and June 2023. These include communities, Water Users Associations, Irrigators Organizations, farmers, livestock keepers, CSOs/NGOs, etc. Consultations have included 3,500 rice farmers from Mbarali District, covering 13 villages.</p> <p>During Project preparation, a Vulnerable Groups screening was conducted to determine whether any of the vulnerable groups met the criteria of OP 4.10 on Indigenous Peoples. These consultations were led by a qualified specialist and consultants with expertise on IPs.</p> <p>Field visits and consultations were conducted in three regions: Morogoro, Iringa and Mbeya, which cover the general landscape of the REGROW Project. In the Morogoro region, four districts' headquarters were visited: Mvomero, Morogoro Rural, Kilosa and Kilombero. In the Iringa region, two districts were visited: Iringa Rural and Kilolo. In Mbeya, Mbarali district was visited. This was then followed by village/hamlet level consultations with the respective village government and representatives from the groups of interest. Consultations in these villages collected</p>



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		information on the history, livelihood, socioeconomic setting, and any issues raised were recorded.
19.	<p>Fear of reprisals. We expect extreme retaliation and reprisal fear for filing this complaint to the Inspection Panel. For example, after the government's violent demarcation exercise in Loliondo, Ngorongoro district, in June 2022, 24 land defenders were arrested, falsely charged with the murder of a police officer. After a six month prison sentence, the 24 were finally released and the detention was widely critiqued as without merit and politically motivated.</p> <p>During the visit by the Mission of the African Commission of Human and Peoples' Rights (ACHPR) to Ngorongoro district, Tanzania from January 23 – 28, 2023, villagers in [red.] waited for hours in vain for the Mission. [red.], a community member, courageously spoke to the gathered crowd on the dire impact of government restrictions and eviction plans, "I have become a thief in my own land. I have cows that have no food...cows being captured...Where is our future? Where is our tomorrow?" Mr. [red.] was forced into hiding after the video of him spread online as the government actively searched for him. More information on his story is available here.</p>	<p><b><i>While they are concerning, the Bank has no means to verify the accuracy of such general allegations. Management notes that the cases cited are unrelated to the Project and outside the Project area.</i></b></p> <p><b><i>Still, the Bank has raised this concern with the Government at the highest levels, and emphasized the absolute necessity of protecting complainants, victims and witnesses from any form of threat, intimidation or reprisal. The World Bank does not tolerate reprisals and retaliation against those who share their views about Bank-financed projects, as stated in the Bank's Commitments Against Reprisals, which is publicly available. The Bank has requested the Government to remind the partners involved in the implementation of the REGROW Project, in particular, the implementing authorities, of the importance of this matter.</i></b></p>

**STATEMENT OF THE GOVERNMENT REGARDING THE INCIDENT OF FIVE  
CITIZENS WHO WERE INJURED BY TANAPA RANGERS IN THE RUAHA  
NATIONAL PARK, MBARALI DISTRICT, MBEYA REGION**

**Honorable Speaker**, in accordance with Rule 56 of the Standing Rules of Parliament, February 2023 Edition, I would like to take this opportunity to provide a brief statement by the Government regarding the incident of five (5) citizens in Mbarali District, Mbeya Region being injured by TANAPA rangers on 6 May 2023.

**Honorable Speaker**, it will be recalled that, on May 11, 2023, after the question and answer session for the Honorable Prime Minister in Parliament, Honorable Francis Leonard Mtega, Member of Parliament for Mbarali asked for guidance from the Honorable Speaker asking Parliament to adjourn the debate to discuss the urgent issue of five citizens (5) in his constituency to be injured by TANAPA rangers. The Honorable Member of Parliament explained that TANAPA rangers arrived with a helicopter in Mwanavala village and attacked the citizens, beat them and confiscated 250 livestock. In addition, the Honorable Member of Parliament explained to the Parliament that the person whose livestock were confiscated is psychologically affected and wants to commit suicide and that relatives and friends are working to protect him against such act.

**Honorable Speaker**, following these allegations, the Honorable Prime Minister gave instructions to the Ministry of Natural Resources and Tourism to go to Mbeya Region to meet with the Honorable Regional Commissioner of Mbeya Region and his Committee of Defense and Security and that of Mbarali District to get the details of the issue for further action.

**Honorable Speaker**, in carrying out the directives of the Honorable Prime Minister, on the same day on May 11, 2023 I accompanied the Deputy Permanent Secretary, the Director of the Department of Wildlife and the Conservation Commissioner of TANAPA to Mbeya Region and on May 12, 2023 in the morning I met and held a meeting with Honorable Juma Zuberi Homera, Regional Commissioner of Mbeya Region and the Regional Security and Safety Committee, Honorable Colonel Denisi Mwila, District Commissioner of Mbarali District and the Security and Safety Committee of Mbarali District and the Leaders of the Ruling Party (CCM) Mbarali District led by the Chairman of CCM Mbarali District Comrade Mary Mbwilo.

**Honorable Speaker**, after the meeting, the whole team travelled to Mbarali District where I started at the offices of the Revolutionary Party and held a meeting with all the leaders, I met including the District Chairperson, the District General Secretary, all the Ward Secretaries of the Revolutionary Party and later we travelled to the area of the incident in Mwanavala village. The distance from Mwanavala village to the scene where the incident occurred is about 20km. With the previous and current boundaries, these areas are under Ruaha National Park and in all these areas there are large beacons placed by TANAPA and were clearly visible. While we were at the scene of the incident, we had a conversation with some citizens, including a citizen who, Honorable Member of Parliament, explained here in front of your Honorable Parliament that 250 of his livestock (cows) had been confiscated and two (2) goats had been killed. After that, we held a public meeting with the citizens, first to apologize for the incident that took place and to gain a common understanding regarding the incident.

**Honorable Speaker**, following the meeting we held with the Regional and District Security and Safety Committees, we visited the scene of the incident, and later held a public meeting of the citizens of the area who participated in large numbers, including the victims and some of their relatives, as well as Councilors including the relevant Ward Councilor Honorable Mr. Chuki Jeremiah Mbanjine, Honorable Mr. Michael Jeremia Makao, Rujewa Ward Councilor and Honorable Mr. Udes Nasoro Selemani, Igawa Ward Councilor, along with the leaders of the Ruling Party (CCM). As a result of the meetin and the visit, I would like to inform your Honorable Parliament that the following were determined: -

1. It is true that on May 6, 2023, TANAPA rangers on regular patrols arrived in Mwanavala village with a helicopter in the areas within the Ruaha National Park about 20km inside the park from park boundaries, and the area that is in areas where citizens are not allowed to enter because it is near the Ruaha River which is part of the source of water for the Mwalimu Nyerere Hydropower Dam. The rangers while on regular patrols noticed the construction of two new cattle fences inside the park against the law;
2. In the process of arresting the suspects, these citizens, who entered the park area criminally and illegally, prevented them from being arrested by throwing stones, sticks, arrows and other traditional weapons and dogs with the aim of harming them. In addition, among the traditional weapons that were fired, they threatened the security of the rangers who were in their legitimate work of conservation and damaged one of the

firearms that the rangers were carrying. The force used by the rangers to defend themselves led to injuries to the citizens and the rangers had to harm the dogs that they attacked for fear of protecting their lives.

3. After the tensions, all the injured citizens were taken to the hospital and received treatment and was covered by TANAPA and they are continuing with their activities as usual. Despite the fact that the relevant incident happened inside the park, the Ministry considered it wise to offer an apology of one million shillings to each member of the public affected by the incident.
4. **Honorable Speaker**, it should be recalled before your Esteemed Parliament that the area where this incident happened is close to the area where the killings of Conservation ranger Mr. Yusti Matei and Village Game Scout Mr. Isaya Mwambe took place a few years ago. The statistics of the Ministry show that 15 rangers have been killed and 51 others have been injured by invading citizens in various parks in the country while performing their duties.
5. **Honorable Speaker**, I would like to inform your Esteemed Parliament that there is no proof of women being stripped of their clothes by the rangers as stated here in Parliament by the Honorable Member of Parliament.
6. **Honorable Speaker**, I would like to confirm to your Esteemed Parliament that NO member of the public has been sexually abused, no livestock (250 cows) belonging to any member has been confiscated, no goat has been killed/confiscated and there is no report of anyone wanting to hang himself as stated by the Honorable Member of Parliament in your Esteemed Parliament; and
7. **Honorable Speaker**, all the rangers involved in the incident were registered with the Police following the instructions of the Government and my instructions.

**Honorable Speaker**, following the incident that occurred in Mbarali District, I would like to reiterate my instructions that I gave in Mbarali District as follows: -

1. All conservation officers in the country should use their expertise in controlling encroachment on the park instead of using excessive force in enforcing the law. This

includes arresting and bringing the suspects to the Law enforcement agencies so that the Law takes its course;

2. The Mbarali incident occurred within the park approximately 10km after the new boundary of the park and 20km within the old boundary very close to the Ruaha River which is the dependent river that produces reliable water in the Mwalimu Nyerere Hydropower Dam which the Government is using public taxes of more than 6.5 trillion to build it, but it is also the dependent river for drinking water and source of water in various rivers in the country. This shows that the citizens entered the area by mistake, without following legal procedures. This area is not allowed to cultivate or breed, nor the passage of citizens and this is based on the actual situation of the field as I explained above along with protecting the wetlands so that the rivers can restore their natural courses of their water flows as I explained.
3. **Honorable Speaker**, I have pleaded with the people and I ask you to allow me to continue to plead with the people to follow all the laws and procedures of the legally protected areas in the interest of all Tanzanians in general of present and future generations. May I continue to plead with the Honorable Members of Parliament to help us, help each other in providing education about the importance of these protected areas;
4. All conservationists in the country should involve Party and Government leaders in resolving conflicts between citizens and protected areas, including providing conservation education to the people around those areas; but they should realize that the citizens are the number one conservationists so they should improve the relations between themselves and the conservationists and every conservation leader in his area will be measured by the way he cooperates with the citizens in their areas. So, they should strengthen their relations with the people and the villages bordering the park.
5. All conservationists in the country should continue to strengthen patrols, set protected areas boundary markers, put up posters and clear the boundaries in order to control invasions in conservation areas for the future of our country, including ensuring access to water for human use, livestock, electricity generation and agriculture in particular irrigation programs.

6. **Honorable Speaker**, I am instructing TANAPA to start the construction of a rangers post to strengthen security in the Ruaha Park.

**Honorable Speaker**, in order to find a permanent solution to the conflicts in this oldest park established in 1910 known as the Saba park, in 1946 it was renamed Rungwa and in 1964 when Mwalimu Nyerere agreed to call it Ruaha, the Government intends to divide the park area with the size of approximately 34,000 hectares to be used for people's development activities where the people of the respective villages will plan for themselves the best land use plan. In addition, the Government will remove 900 acres to be used for grazing activities. This week the Government will complete the valuation of citizens' properties in some areas of Mwanavala village so that other compensation procedures can continue. I would also like to inform your Esteemed Parliament that the Government has completed the installation of beacons in the new border of the Ruaha National Park.

**Honorable Speaker**, the Government is finalizing the process of preparing a draft Government Notice (GN) for the new Ruaha National Park and once the relevant procedures are completed, the Government through the Attorney General's Office will bring a Resolution to the Parliament to obtain Parliament's approval as per law and finally submitted the GN to the Honorable President of the United Republic of Tanzania for appropriate action.

**Honorable Speaker**, I humbly submit.