

July 20, 2023

IPN REQUEST 23/02

## Notice of Registration

### Request for Inspection

#### Tanzania: Resilient Natural Resource Management for Tourism and Growth (REGROW) (P150523)

#### Summary

1. On June 20, 2023, the Inspection Panel (the “Panel”) received a Request for Inspection (the “Request”) related to the World Bank-financed Tanzania: Resilient Natural Resource Management for Tourism and Growth (P150523) (the “Project”).<sup>1</sup> The Request was submitted by two individuals who live in the Ruaha National Park (RUNAPA) area, in Tanzania. The Requesters have expressed fear of retaliation and reprisal for submitting the Request to the Panel. The Requesters asked the Panel to keep their identities confidential and authorized the Oakland Institute, a US-based civil society organization and policy think tank, to provide them with support and advice throughout their engagement in the Panel process.
2. The Request alleges that the Project does not follow several safeguard policies and procedures of the Bank, resulting in harm to project-affected communities. With respect to involuntary resettlement, the Request alleges that communities in five villages within the Project area, adjacent to RUNAPA, with an approximate total population of 21,000 people are under threat of eviction. It adds that no Resettlement Action Plan (RAP) was prepared. The Request alleges that the affected communities have not had meaningful consultation or that project documentation has not been disclosed to them.
3. The Request alleges community members face violence from rangers at RUNAPA, which has created a sense of constant fear among them. It claims that over the past two years, their cattle have been seized in large numbers to the detriment of pastoral livelihood. The Request alleges in one case Park rangers seized cattle from a pastoralist “*under the false pretense the cattle were encroaching on the nearby RUNAPA.*”
4. The Request alleges 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.*” The Request claims that the Bank failed to trigger its policy on Indigenous Peoples, causing irreparable harm to the identity, culture, and rights of these indigenous groups and that no free, prior, informed consultations were conducted with them.

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<sup>1</sup> In this Notice of Registration, the World Bank refers to the International Development Association (IDA) and the terms “IDA” and “Bank” are used interchangeably.

5. On June 30, 2023, the Panel acknowledged the receipt of the Request by issuing a Notice of Receipt on its website and informed the Requesters, Bank Management and the Accountability Mechanism Secretary. The Panel conducted its initial due diligence of the Request and confirmed that it meets the admissibility criteria. Therefore, by way of this Notice of Registration, I hereby inform you that on July 20, 2023, I have registered this Request.

## **The Project**

6. The Project was approved by the Board of Executive Directors on September 28, 2017, for an amount of US\$ 150 million International Development Association (IDA) Credit. The Ministry of Natural Resources and Tourism (MNRT) of Tanzania and the Tanzania National Parks (TANAPA) are the leading Project implementing agencies. Its current closing date is February 28, 2025. At the time of receiving the Request, the total disbursement stood at 63.14 percent.

7. 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.<sup>2</sup> The Project supports improving the country's capacity to conserve its wildlife as a basis to attract tourists and promote conservation-friendly alternative livelihoods in local communities. It covers the infrastructure gap in priority Protected Areas (PAs). It includes investments in the Great Ruaha River Sub-basin to mitigate impacts inside RUNAPA caused by days without water flow. It will develop a water resources management model. It also aims to implement a marketing and branding campaign to increase the number of visitors to the Southern Circuit.<sup>3</sup>

8. The Project covers four large and unique PAs in Tanzania: (i) RUNAPA, the largest National Park in East Africa, encompassing 20,226 square kilometers (km<sup>2</sup>); (ii) the Selous Game Reserve (SGR), Africa's largest game reserve and a UNESCO World Heritage Site extending over 50,000 km<sup>2</sup>; (iii) Mikumi National Park (MINAPA) covering 3,230 km<sup>2</sup>; and (iv) Udzungwa National Park (UMNP) covering 1,990 km<sup>2</sup>. The Project was assigned environmental Category B. According to the PAD, the Project triggered the following safeguard policies, Environmental Assessment OP/BP 4.01, Natural Habitats OP/BP 4.04, Forests OP/BP 4.36, Pest Management OP 4.09, Physical Cultural Resources OP/BP 4.11, and Involuntary Resettlement OP/BP 4.12.<sup>4</sup>

9. The Project has four components. Component 1 aims to improve the management and sustainability of natural resources inside the four priority PAs in Southern Tanzania. Component 2 supports strengthening alternative livelihoods for targeted communities in proximity to the priority PAs. Component 3 supports strengthening landscape management

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<sup>2</sup> Project Appraisal Document on a Proposed Credit in the Amount of SDR 106,600,000 (US\$ 150.00 million equivalent) to the United Republic of Tanzania for a Resilient Natural Resource Management for Tourism and Growth Project – September 7, 2017 (PAD), Project Development Objective, p. 7 para. 19.

<sup>3</sup> The Southern Circuit includes several National Parks (i.e., the Katavi, Kitulo, Mahale, Udzungwa, Mikumi and Ruaha National Parks), game reserves (Selous being the largest), two rift valley lakes (Nyasa and Tanganyika), areas of cultural interest, and a gateway town, Iringa. PAD, p. 3

<sup>4</sup> PAD, para 77, p. 23.

and infrastructure investments in and upstream of RUNAPA. Component 4 supports project management, institutional strengthening, quality assurance and control, and monitoring and evaluation.

## **The Request**

10. The Request alleges that the Project does not comply with the Bank’s safeguard policies and procedures and this led to harm to project-affected communities living in the RUNAPA area. The policies raised in the Request are: Environmental Assessment (OP/BP 4.01), Natural Habitats (OP/BP 4.04), Indigenous Peoples Policy (OP/BP 4.10), Physical Cultural Resources (OP/BP 4.11), Involuntary Resettlement (OP/BP 4.12) and Forests (OP/BP 4.36).

11. The Request alleges the following harms: (i) loss of livelihood and economic displacement, including due to the alleged “*confiscation*” of livestock and cattle, and non-compliance with the Involuntary Resettlement policy; (ii) potential for, and threats of, forced eviction; (iii) retaliation and violence against community members by TANAPA rangers, (iv) adverse impact on indigenous communities, including due to the Project’s non-triggering of the Indigenous Peoples policy; (v) lack of meaningful consultation and insufficient disclosure of project information; and (vi) fear of intimidation and reprisals for the submission of the Request.

12. **Allegations of Loss of Livelihood.** The Request alleges that Government agencies and TANAPA rangers have been seizing cattle in large numbers from local community members, sometimes violently, and either requiring the owners to pay large fines for their return or selling the cattle. It also claims that thousands of cattle were seized for allegedly grazing within the Ihefu wetlands. The Request alleges that over the past two years, instead of supporting communities living in the Project area, authorities have been seizing and auctioning off their cattle, severely affecting the communities’ livelihood as pastoralists. The Request lists some incidents in which cattle were allegedly seized. According to the Request, these seizures have “*decimated families*” economically and are being carried out to force pastoralists to find alternative livelihoods or leave the area.

13. **Allegations of Forced Eviction.** The Request alleges that evictions for five villages within the Project area, with an approximate population of 21,000 were announced on October 25, 2022, by the Minister of Land, Housing and Housing Development. According to the Request, the evictions will include an additional 47 sub-villages within 14 villages (with cancelation of village registration). The Request alleges that the announced evictions threaten villages that “*fall within the REGROW project area.*” It also alleges that the Project has not followed the process and “*steps required by the World Bank*” including “*meaningful consultations with affected communities and [...] preparation [of] the Resettlement Action Plan (RAP).*” The 852 smallholder farmers from villages facing eviction have filed a case in the High Court of Tanzania at Mbeya to try to challenge the evictions. The Request alleges these failures by the World Bank “*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.*”

14. **Allegations of Retaliation and Violence.** The Request states that the Project provides direct material, policy and institutional support to the Government for the management of RUNAPA. The Request claims that the Bank is in partnership with TANAPA and the Project has provided equipment that is being used for patrols. According to the Request, park rangers have practiced “*extreme cruelty*” during the cattle seizures and have allegedly engaged in “*extrajudicial killings*” and “*disappearance*” of community members. The Request includes the description of several alleged incidents of alleged violence committed by park rangers. One of these allegedly occurred on May 6, 2023, when “*a helicopter carrying six Tanzania National Parks Authority (TANAPA) armed rangers made a surprise landing in [...] village in the Mbarali district of Tanzania. Three Maasai women were brutally assaulted by the rangers*” including burning and beating them with “*a bush knife.*”

15. **Allegations of Harm to Indigenous Peoples.** The Request alleges that the planned evictions, incidents of violence and cattle seizures have impacted several Indigenous Peoples groups, including Maasai, Sukuma and Datoga pastoralists, “*who inhabit the Project area.*” It states the Project failed to trigger the Bank policy on Indigenous Peoples, causing irreparable harm to the identity, culture, and rights of these indigenous communities. It adds that no free, prior, informed consultations were conducted with the affected indigenous communities.

16. **Allegations of Lack of Meaningful Consultation and Disclosure of Project-related Documents.** The Request states that the alleged “*forced evictions [are] set to occur without meaningful consultation and disclosure of project documents.*” The Request also adds that the “*failure to ensure meaningful consultations*” could cause significant harm due to physical and economic displacement of the affected communities.”

17. **Allegations of Intimidation and Reprisal for the Submission of the Request.** The Requesters fear “*extreme retaliation and reprisal fear (sic) for filing this complaint to the Inspection Panel.*” They refer to a past incident when a community member “*spoke to the gathered crowd on the dire impact of government restrictions and eviction plans*” and was forced into hiding after a video of him spread online and “*government actively searched for him.*”

### **Panel’s Initial Due Diligence**

18. After receipt of the Request, the Panel conducted its initial due diligence and verified that the Request meets the admissibility criteria for registration. The Request is not frivolous, absurd, or anonymous, and was submitted by individuals living in the Project area who claim to be affected by the Project.

19. The Panel reviewed earlier correspondence between the Requesters’ advisors and Bank Management concerning these issues. The Panel is satisfied that the issues have been brought to the attention of the Bank prior to the submission of this Request. The Panel verified that the subject matter of the Request does not concern issues of procurement and, at the time of receipt of the Request, the Project was 63.14 percent disbursed with a current closing date of February 28, 2025. During its initial review of the Request, the Panel met with the Requesters and their

advisor, Oakland Institute, on June 28, 2023, and July 17, 2023, to understand their concerns better, seek clarifications, and inform them about the Panel’s process and mandate.

20. As part of its initial due diligence process, the Panel also met with Bank Management on July 18, 2023. Management confirmed to the Panel that it had received correspondence concerning issues raised in the Request. Management provided a briefing on the Project and its components. Management showed a map that described the location of the five villages mentioned in the correspondence about the Requesters’ concerns as villages allegedly facing eviction; stating that the villages are within RUNAPA. Management indicated that there has been no resettlement in the context of the Project and no resettlement is planned or needed to achieve the project development objectives of REGROW. Management further explained that government authorities agreed they would use Bank policies to guide the preparation and implementation of any resettlement should the need arise, even for activities not financed by the Project but related to the Protected areas and this would be in line with OP 4.12. Management mentioned the past and ongoing stakeholder engagement and described some of the alternative livelihood activities. Management stated that the Project provides TANAPA rangers with equipment such as tents, uniforms, binoculars, first aid kits and vehicles. Management stated that it conducted a screening and determined that there are no Indigenous Peoples with collective attachment to land and the social assessment also confirmed this and their determination was that the policy is not applicable.

21. The Panel considers that the following areas of alleged harm could be plausibly linked to the Project and alleged violations of Bank policies: (i) the alleged economic displacement and livelihood impacts on the project-affected community members, including from the alleged seizing of cattle by the implementing agency; (ii) the alleged threat of evictions and the alleged potential for physical and economic displacement of the five villages in the RUNAPA areas; (iii) the violence allegedly exercised by the TANAPA rangers in the Project area (iv) issues regarding allegedly insufficient meaningful consultation and disclosure of Project-related information; and, (v) the claims that Indigenous Peoples are affected by the Project but have not received the protections afforded by the Indigenous Peoples Policy. The Panel also notes the Requesters have expressed fear of intimidation and reprisals for voicing their concerns.

### **Registration of the Request**

22. As provided in paragraph 18 of the Panel’s Resolution (the “Resolution”), “*the Chairperson of the Panel shall inform the Executive Directors and the President of the Bank promptly upon receiving a request for inspection.*”<sup>5</sup> With this notice I hereby inform you that I have, on July 20, 2023, registered the above-mentioned Request.

23. The Panel’s registration implies no judgment whatsoever concerning the merits of a Request for Inspection. As provided in paragraph 19 of the Resolution,<sup>6</sup> Bank Management must provide the Panel within 21 business days (by August 18, 2023) a response to the issues raised in the Request for Inspection. The subject matter that Management must deal with in the response to the Request is set out in paragraph 20 of the Resolution.

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<sup>5</sup> World Bank Inspection Panel, [Resolution No. IDA 2020-0003](#) (the “Resolution”), September 8, 2020, para. 18.

<sup>6</sup> Resolution, para. 19.

24. After receiving the Management Response, the Panel will “*determine whether the request meets the eligibility criteria set out in paragraphs 13 to 15 [...] and shall make a recommendation to the Executive Directors as to whether the matter should be investigated.*”<sup>7</sup>  
This Request has been assigned IPN Request Number 23/02.

Yours sincerely,



Ramanie Kunanayagam  
Chairperson

Attachments

Mr. Ajay Banga, President  
International Development Association

The Executive Directors and Alternates  
International Development Association

Requesters (confidential)

Oakland Institute

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<sup>7</sup> Resolution, para. 22.