Report No. 198064-TZ

The Inspection Panel

Recommendation for Verification of the Implementation of the Management Action Plan in Response to the Inspection Panel Investigation of the

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

A. Introduction

1. On June 20, 2023, the Inspection Panel (the "Panel") received a first Request for Inspection related to the Bank-financed Tanzania: Resilient Natural Resource Management for Tourism and Growth (P150523) ("REGROW" or the "Project"). On May 3, 2024, the Panel received a second Request for Inspection related to the Project. Both Requests were submitted by two individuals (the "Requesters") from the southern area of Tanzania's Ruaha National Park (RUNAPA). Both Requests raised concerns about the Government-announced relocation of villages and additional sub-villages located inside the boundaries of RUNAPA (the "Park"). They also alleged that access to RUNAPA and to grazing lands within it, was restricted, at times by use of excessive force, and that community members' cattle had been seized in large numbers, causing hardships for pastoralists and their livelihoods. In substance, the Requesters claimed the Bank had failed in applying its policies and procedures intended to safeguard communities and the environment against negative impacts arising from Bank-financed projects. The Requesters asked for confidentiality, fearing intimidation and reprisal. They authorized an international civil society organization, to provide them support and advice during the Panel process.

2. Covering both Requests, the Panel conducted an investigation into the World Bank's (the "Bank") compliance with its policies on Environmental Assessment (OP 4.01), Involuntary Resettlement (OP 4.12), and Investment Project Financing, particularly in regards to (a) whether the due diligence and the assessments conducted on the capacity and processes of one of the Project's lead implementing agencies, i.e., TANAPA, were appropriate and adequate; (b) whether associated risks to communities, including the risk of involuntary resettlement, had been identified in project documents and appropriate mitigation measures had been put in place; and (c) whether the Bank had adequately supervised the Project implementation. On September 16, 2024, the Panel submitted its Investigation Report to the Bank's Board of Executive Directors (the "Board"). On April 1, 2025, the Board approved the Management Action Plan (MAP) contained in the Management Report and Recommendation which responds to the Panel's findings.

3. During the Board meeting on April 1, 2025, the Panel stated its intention to recommend a verification of the MAP implementation, on the basis of paragraph 12 of the Verification

Framework, which states that "*when circumstances are deemed exceptional based on the gravity of the harm*," "*the Executive Directors may discuss and assign verification at the stage of approval of the MAP or shortly after*."[1] The Panel considers that the gravity of the harm meets this threshold. The gravity of the harm has also been recognized by Management, stating in its second Response to the Request, that the Bank did not consider the potential impacts of improved park management and protection on the livelihoods of many communities in and around the Project-supported parks, resulting in injuries and even fatalities among community members and rangers.[2]

4. The Panel assessed the case against the "Risk-Based Proportionality Criteria" stipulated in the Framework for Proportionality Criteria and Modalities for Independent Verification of Management Action Plan Implementation (the "Verification Framework") and determined that the case meets all eight criteria. Shown in the table below, the Panel affirmed the parameters set out in paragraph 50 of the Resolution, including specific concerns regarding (i) urgency of redress, (ii) risk of repetitive harm materializing, (iii) number and vulnerability of project-affected people, (iv) complexity of the case, and (v) risk of retaliation against Requesters.

5. Therefore, in line with paragraphs 52 and 53 of the Panel Resolution[3] and paragraphs 9 and 12 of the Verification Framework, the gravity of the harm being recognized by Management as well as the Risk-Based Proportionality Criteria, the Panel recommends that the Board approve a Panel verification of the implementation of the actions set out in the MAP.

6. The proposed verification would include the modality of a site visit. The Panel anticipates that this visit would involve two Inspection Panel personnel and would be undertaken over a period of three to four days. The Panel anticipates that this verification will be completed within three months of the Board's approval, and a report will be provided to the Board.

7. As per paragraphs 16 and 17 of the Verification Framework, once the Board has approved the verification recommendation, the Panel will review and report on the status of the Management actions set out in the MAP. The Panel and Group Internal Audit (GIA) will conduct the verification in line with the principles stipulated in paragraph 49 of the Resolution, respecting their roles consistent with their expertise and institutional mandates and as laid out in paragraphs 50 to 52 of the Resolution.[4]

---

[1] Framework for Proportionality Criteria and Modalities for Independent Verification of Management Action Plan Implementation, February 3, 2021 (Verification Framework), para. 12.

[2] Management Response to the Second Request for Inspection Panel Review of the Tanzania: Resilient Natural Resources Management for Tourism and Growth (P150523), dated June 27, 2024, p. ix, para. xv.

[3] The World Bank Accountability Mechanism: Inspection Panel and Dispute Resolution Service, March 7, 2025 (The Panel and DRS Resolution).

[4] The Panel and DRS Resolution, para 49 states the following "*principles apply for independent verification: (i) verification will focus solely on the Bank's actions as outlined in the management action plan, distinguishing between periodic tracking of progress and terminal verification; (ii) verification will assess the status (including completion) of specific Management actions included in the management action plan based on appropriate evidence of implementation status; (iii) to ensure efficiency of the verification process, it is important to have a timeline for verification based on timelines of agreed actions to avoid premature review of actions; and (iv) there will be a role for the Panel and /or Group Internal Audit during the verification process that is consistent with their expertise and institutional roles*."

B. Management Report and Recommendation and Action Plan

8. In its Report and Recommendation, Management states that it appreciates the insights provided by the Panel's Investigation Report and that the Panel's account of the complex Project context is useful and provides important lessons.[5]

9. Management added that it carefully reviewed the Project and concluded that key risks were not fully appreciated during Project preparation and supervision. The three key risks that were underappreciated are 1) the risk of resettlement to sizeable communities that found themselves residing inside RUNAPA as a result of a government expansion of the Park in 2008, which was unrelated to the Project; 2) the increased risk of violent confrontations between rangers and community members resulting from the Project enhancing the capacity of TANAPA to enforce existing park rules; and 3) the risk of adverse socio-economic impacts, resulting from the enforcement of park rules, on community members in and around RUNAPA who relied on Park resources for their livelihoods (e.g., grazing, hunting, fishing).[6]

10. Management stated that the Bank and the Borrower have agreed on a MAP to address the Panel's findings.[7] Management added that it has also derived useful lessons from this Project, and that these will inform its engagement in the sustainable and inclusive conservation sector going forward, as well as help the Bank to better assess and manage the potential impacts and risks stemming from access restrictions and law enforcement.[8]

11. The MAP table is included as Annex A in this report. The timeframe for all actions, but one, has elapsed. The remaining action relates to the preparation of a Good Practice Note on Managing the Risks of Projects Involving Protected Areas which Management committed to complete by December 31, 2025.[9]

12. Specifically, Management stated that the MAP places a strong emphasis on addressing livelihood challenges that potentially have arisen from restriction of access to Park resources. To this end, Management has worked with the Borrower to identify platforms to implement the MAP, including leveraging financing of US$ 2.8 million from a Trust Fund developed independently from REGROW and delivering immediate support for alternative livelihoods for communities in the villages inside RUNAPA and some communities around the Park.[10] The MAP refers to a project that includes a new community-led operation, financed by the International Development Association (IDA), which will scale up locally-led community climate actions and support

[5] Management Report and Recommendation in Response to the Inspection Panel Investigation Report - Tanzania: Resilient Natural Resource Management for Tourism and Growth (REGROW) Project (P150523) (Management Report and Recommendation), p. vi, para. vi.
[6] Management Report and Recommendation, p. vi, para. vii.
[7] Management Report and Recommendation, p. xi, para. xxiv.
[8] Management Report and Recommendation, p. xii, para. xxix.
[9] Management Report and Recommendation, p. 37.
[10] Management Report and Recommendation, p. 34.

alternative livelihoods. According to Management, the proposed operation is to help address the adverse effects of environmental degradation and conservation, including for residents of villages affected by livelihood restrictions. In addition to the financing for livelihoods-related activities just mentioned, the MAP states Management will confirm that a strengthened Grievance Redress Mechanism is in place and will set up and maintain a Country Office hotline and email ("Tanzania Alert") for additional grievance reporting in relation to its lending portfolio.[11]

13. Furthermore, Management committed to support the Borrower to convene a workshop to discuss relevant good international practice on protected area management, including topics on effective and responsible enforcement of restrictions, conflict avoidance, and community engagement and benefit sharing. As mentioned above, Management has also committed to preparing an Interim Guidance Note for Bank staff on managing the risks of projects involving protected areas, and it is also developing a more comprehensive Good Practice Note on the same topic. In addition, Management has committed to include in the design and delivery of staff training on Environmental and Social Framework a dedicated module focused on national parks and protected areas.[12]

C. The Panel's Assessment of the Risk-Based Proportionality Criteria

14. The Panel assessed the risk-based proportionality criteria and the modalities for verification required as per the Panel Resolution and the Verification Framework. The table below provides the Panel's commentary and its specific concerns on each criterion.[13]

Risk-Based Proportionality Criteria Applied to the MAP			
	Yes	**No**	**Comments / Specific Concerns**
(i) Urgency of redress			
1. Is urgent or immediate redress required by the severity of the harm experienced?	Yes		Law enforcement in RUNAPA (relating to cattle seizing and livelihood restrictions) is negatively affecting the well-being of communities whose livelihoods depend on accessing Park resources. Recent reports raised concern about continued serious harm allegedly committed by TANAPA, including a report on two fatalities from villages in RUNAPA in April and May 2025.[14]
(ii) Risk of repetitive harm materializing			
2. Is there a risk of repetitive harm in this project?	Yes		Law enforcement activities are ongoing, and communities continue to pursue and depend on livelihoods that are based on accessing Park resources and which exposes them to the potential use of excessive force as unauthorized access to the Park is considered illegal.

[11] Management Report and Recommendation, p. 35.
[12] Management Report and Recommendation, p. 36-37.
[13] The Verification Framework, paras. 7 and 17.
[14] For reference, see https://x.com/WatetezitV/status/1921285333364211966.

Risk-Based Proportionality Criteria Applied to the MAP			
	Yes	**No**	**Comments / Specific Concerns**
3. Is there a risk that the harm in this project might be repeated in other projects?	Yes		There is a risk that similar harm might be repeated in Tanzania and elsewhere, where the law prohibits the unauthorized presence of people in national parks and protected areas and where law enforcement authorities have a mandate to use force to restrict community access to park resources.
(iii) Number and vulnerability of project affected people			
4. Does the MAP address vulnerable groups such as women, children, indigenous peoples, marginalized communities, etc., requiring special attention?	Yes		The livelihoods of communities in and around the Park continue to depend on pastoralist activities and farming. In the absence of additional or alternative livelihoods and access to communal grazing grounds, pastoralist communities are considered vulnerable in this context.
5. Are there significant numbers of project-affected people?	Yes		The Project has affected over 21,000 people residing within RUNAPA. According to the Requesters the Project has also affected over 80,000 people relying on Park resources.
(iv) Complexity of the case			
6. Is the case unusually complex?[15]	Yes		The Project enhanced TANAPA's capacity to enforce laws on park management in a context where legislation considers it illegal to reside in parks and to access them without authorization. This risk had already materialized for communities who resided and/or used land that had been outside the Park but became incorporated into the Park based on a change of Park boundaries in 2008. This enforcement risk also materialized for communities who are not residing inside the Park but have been relying on Park resources for their livelihoods. Management noted in its Report and Recommendation that "*the involvement of law enforcement brings with it a distinct possibility of confrontations with individuals or groups who may resist conservation regulations. In some cases, the enforcement of these rules might require the legitimate and lawful use of force, which raises complex and significant risks*."[16]
7. Are the issues new or unique,[17] with a high potential for learning?	Yes		The issue of enforcing law and managing conflict risks in relation to restricting access to natural resources that are used in common and physical resettlement in support of conservation and tourism objectives is a unique challenge. This challenge is also relevant to projects in other contexts

[15] The complexity of a case reflects the issues covered or where the types of harm experienced are multiple and/or of large variety.
[16] Management Report and Recommendation, p. 27, para. 69.
[17] The uniqueness of the issues provides weight to emerging issues where additional attention is required, and where institutional learning can benefit the Bank.

Risk-Based Proportionality Criteria Applied to the MAP			
	Yes	**No**	**Comments / Specific Concerns**
			and sectors where law enforcement affects the accessibility and use of natural resources that are used in common. Management stated that "*for all new engagements that support law enforcement efforts in protected areas and/or which may restrict people's livelihoods by limiting their access to natural resources, the Bank is applying the lessons of REGROW*."[18]
(v) Risk of retaliation against Requesters			
8. Is there a risk of retaliation against Requesters or communities?	Yes		Requesters have and continue to raise serious retaliation concerns since the beginning of the Panel process, including most recently during the MAP consultation.

15. In its Investigation Report, the Panel identified instances of non-compliance by the Bank that adversely affected a large number of vulnerable communities, mainly landless pastoralists. The Panel determined that by providing equipment and infrastructure to improve the ability of TANAPA to patrol RUNAPA and to combat illegal activities, including cattle grazing in the Park, the Project would invariably lead to the restriction of access to the southern part of RUNAPA, which is a legally designated Park, and that this would result in adverse impacts on the well-being of the communities residing in RUNAPA and the livelihoods of the communities in and around the Park relying on its resources for cattle grazing and farming. The Panel's Investigation Report found instances of non-compliance linked to the alleged harm, which Management acknowledged may have included injuries and even fatalities. The Panel considers such harm to be grave and serious.

16. The Panel's review shows that all eight criteria of the Verification Framework are met. In particular, the Panel notes the urgency of redress since law enforcement activities could still be affecting communities, especially the more vulnerable pastoralists. The Panel is concerned with the risk of repetitive harm to the community members residing within Park boundaries or those relying on the Park's resources for their livelihoods. As Management acknowledged, the Panel's investigation has offered a high potential for learning, because it has drawn attention to the challenge that legitimate enforcement of park rules can raise complex involuntary resettlement and conflict risks which need to be carefully considered and assessed during project planning and preparation as well as requiring robust supervision and adequate reporting during the implementation stage.

17. In accordance with paragraph 10 of the Verification Framework and reflected in the table below, six to eight positive indicators indicate a site visit as the most appropriate modality for the Panel's verification.

Number of Positive indicators	Desk-based Verification	Verification with site visit
6-8		✓
3-5		

[18] Management Report and Recommendation, p. 25, para. 63.

0-2		

18. The overall scope of verification is determined by paragraphs 16 and 17 of the Verification Framework in response to the specific concerns identified in the table on the Risk-Based Proportionality Criteria. The Panel with GIA will review the actions in the MAP and agree on their respective scopes consistent with their expertise and institutional mandates.

D. The Panel's Recommendation

19. As required by the Resolution,[19] the Panel sought the input of GIA on the proposed management actions. GIA confirmed to the Panel that, if the Board approves the verification, it will verify actions in Management's Report that address the Bank's governance, policy and procedures, and other internal operational arrangements regarding the oversight of environmental and social risks of Bank projects. GIA aims to complete its verification review by the first quarter of 2026.

20. Furthermore, the Panel also sought Management's input. On April 9, 2025, Management shared its input, which is included in full as Annex B to this report. The Panel's Table of Findings from its Investigation Report is attached as Annex C.

21. Based on paragraphs 52 and 53 of the Panel Resolution[20] and paragraphs 9 and 12 of the Verification Framework,[21] the gravity of the harm being recognized by Management as well as the risk-based proportionality criteria, the Panel recommends that the Board approve a Panel verification of the implementation of the MAP actions and for this verification to include a site visit. The Panel anticipates that the visit would involve two Inspection Panel personnel for a period of three to four days. The Panel anticipates that this verification will be completed within three months of the Board's approval.

22. As per paragraphs 16 and 17 of the Verification Framework, once the Board has approved the verification recommendation, the Panel will review and report on the status of the Management actions set out in the MAP and in response to the specific concerns identified in the table on the Risk-Based Proportionality Criteria. The Panel and GIA will conduct the verification in line with the principles set out in paragraph 49 of the Resolution, including respecting their roles consistent with their expertise and institutional mandates.

[19] Panel and DRS Resolution, March 7, 2025, para. 52.
[20] Panel and DRS Resolution, March 7, 2025.
[21] Verification Framework, February 3, 2021, paragraph 12.

Annex A

Management Action Plan Table

Issue/Finding	Borrower Action	Management Action
The Panel finds that Management did not recognize that Project support of park management would invariably restrict access to legally designated parks, including the southern part of RUNAPA, and that this could result in adverse impacts on livelihoods linked to the Project. Thus, the Panel finds the Project is not in compliance with OP 4.12 paragraph 3(b).	The Borrower will work with the Bank to support communities in and around RUNAPA in an effort to balance conservation and development, including reducing incidences of conflict and violence in the Park and providing alternative livelihoods. This will involve: ***(a) The establishment of a project financed by a Trust Fund, which has been developed independently from the REGROW objectives and scope. It will include support for alternative livelihoods prioritized by communities in the villages and sub-villages inside RUNAPA and some communities around the Park***. The project is supported by a US$ 2.8 million grant from the Trust Fund. The project will be implemented by the Rufiji Basin Water Board (RBWB) assisted by a reputable local NGO to be identified. The communities of focus will be 45 vulnerable villages in Mbarali District, including the five villages and several sub-villages inside RUNAPA. The Project Development Objective is to promote community-led	(a) Providing technical support to the Borrower for the preparation and submission of the project proposal to secure financing for these activities. ***Date: February 2025***

	solutions to climate change adaptation in the Usangu Catchment. Targeted beneficiaries include community groups, water user associations, smallholder farmers, and livestock keepers. Activities include alternative livelihoods, and a range of services (for empowerment, awareness raising, legal information, psycho-social support, etc.). ***Date: Project approved by February 2025.***	
	(b) The preparation of a new IDA-financed operation that will scale up locally led community climate actions and support alternative livelihoods. The proposed Program will help address adverse effects of environmental degradation and conservation, through scaling up locally led community climate actions by supporting livelihood activities developed based on participatory processes involving the communities. The operation is under preparation and is being prepared for Board consideration in FY25. While national in scope, it will build upon support provided under the Trust Fund grant to vulnerable communities in the Usangu Catchment, including Mbarali District. The design of this operation will be based on participatory processes including a socioeconomic assessment of the relevant communities	(b) Provide technical support to the Borrower for the preparation of the proposed IDA operation for Board consideration. ***Date: June 30, 2025***

	carried out in consultation with the residents of villages affected by livelihood restrictions. The operation will also include the updated GRM. The community-based activities under this operation will support livelihood activities identified in consultation with communities, including micro-finance, community forestry, clean cooking, and will be supported by legal information, social services and community empowerment, among others. ***Date: June 30, 2025.***	
	(c) The Borrower will maintain the strengthened GRM (comprising GRCs, toll free lines and the Government's digital complaints platform). The GRCs have been strengthened through training, adherence to the updated GRM Manual and continuous dissemination of IEC materials. ***Completed: November 6, 2024***	(c.1) Management will confirm that a strengthened GRM is in place through GRM reports (number and types of grievances lodged and addressed). ***Completed: November 6, 2024*** (c.2) Management will set up and maintain the Country Office hotline and email ("Tanzania Alert") for additional grievance reporting in relation to its lending portfolio. ***Completed: June 25, 2024***
	(d) The Borrower will submit a report on implementation of the GRM. ***Completed: November 6, 2024***	(d) Management will review the report on GRM implementation and provide feedback to the Borrower based on international experience. ***Completed: November 11, 2024***
	(e) The Borrower will confirm that the communities inside RUNAPA will not be	(e) ***Completed: June 26, 2024***

	resettled in the foreseeable future. ***Completed June 26, 2024***	
Assessment of the Implementing Entity's Capacity and Consideration of Human Health and Safety; and Social Aspects as a result of Project Activities …Panel finds the Project is not in compliance with the IPF Policy, paragraph 5, which requires the Bank to assess the appropriateness of the needs and capacity of the borrower and any project implementation entity. The Panel also finds the Project is not in compliance with the Bank's Environmental Assessment Policy, OP 4.01, paragraph 3, which requires a project to take into account human health and safety and the institutional capabilities related to the environmental and social aspects.	(a) The Borrower will convene a workshop with development partners, including the Bank, to discuss international good practice on park management, including participatory approaches to balance conservation with support for community livelihoods. This will further inform policies and practices applicable to park management in Tanzania, including best practices relating to the use of force hierarchy; conflict avoidance; and community engagement and benefit sharing. ***Date: May 31, 2025***	(a) The Bank will support the Borrower, in collaboration with other development partners, to convene this workshop to discuss relevant good international practice on protected area management including on effective and responsible enforcement of restrictions; conflict avoidance, community engagement and benefit sharing. ***Date: May 31, 2025*** (b) Management will prepare an Interim Guidance Note on Managing the Risks of Projects Involving Protected Areas. The Note will promote sustainable management of protected areas in a way that addresses both ecological goals and the rights of local communities, while ensuring that security risks and the potential for conflict are managed responsibly during project preparation and supervision. ***Completed: January 30, 2025*** (c) Based on the Interim Guidance Note, Management will prepare a more comprehensive Good Practice Note on the same topic. ***Date: December 31, 2025*** (d) Management will design and deliver staff training program on the

		Environmental and Social Framework (ESF), to include a dedicated module focused on national parks and protected areas. This new module, which is based on the Interim Guidance Note referred to above, is designed to enhance the capacity of staff working on projects related to these ecologically sensitive areas. It covers a range of important topics, including the preparation of Process Frameworks, and the identification and management of risks related to the enforcement of access restrictions. It will include training on the mitigation of broader community impacts and risks relating to the enforcement of park rules and access restrictions through participatory processes and mechanisms for identifying sustainable livelihoods, and for conflict prevention and management. ***Date: May 31, 2025***

Annex B

Management input to the Panel Recommendation for Verification of the Implementation of the Management Action Plan in Response to the Inspection Panel Investigation of the Tanzania: Resilient Natural Resource Management for Tourism and Growth Project (P150523)

This sets out Management's input on the planned recommendation, which the Panel will share with the Board to inform the Board's decision on whether to approve such verification, as well as the scope of any such authorization.

According to paragraphs 47 and 52 of the Accountability Mechanism Resolution as amended in 2025, **Management has the sole responsibility for monitoring the implementation of the Management Action Plan (MAP)**. As usual, Management will rigorously monitor implementation of the MAP in this case and report to the Board on its implementation annually until completed. Given the nature and scope of actions included in the Tanzania: Resilient Natural Resource Management for Tourism and Growth Project (REGROW) MAP, we expect full implementation within a year.

Paragraph 53 of the Resolution states that the Panel's recommendation to verify implementation of the MAP generally "*will be made after substantial implementation of the management action plan, or, if the progress report indicates a lack of implementation, at any stage of implementation*." In Management's view, a year from today, or the date before then when Management submits its progress report, would be an appropriate time for the Panel to begin verifying the implementation of the MAP, since all the actions are likely to have been completed by then.

To the extent that the Panel intends to begin verifying implementation of the MAP sooner, the Panel would need to rely on paragraph 53 of the Resolution, which allows the Panel in "***exceptional cases***" to recommend verification at the stage of approval of the MAP or shortly after. If the Panel decides to rely on this clause, we assume the Panel will be **seeking Board authorization on the following points as part of its recommendation**:

- **Exceptional case**: The reasons why, in the Panel's view, it would be insufficient for the Board to rely on Management's monitoring and reporting to the Board, or to rely on the Panel's verification after substantial implementation of the MAP. If the Panel intends to verify implementation of the MAP "*within one year of implementation of the MAP*," then the Panel can rely on the ordinary verification process after substantial implementation of the MAP.
- **Scope of verification**: Confirmation of which specific Management action(s) the Panel intends to verify. As you know, according to paragraphs 48-51 of the Resolution, the Panel is limited to verifying "*implementation*" of the MAP. The Panel's mandate does not include reviewing the adequacy of the measures in the MAP, whether the measures are well-suited or effective to address the Panel's findings, whether any additional actions are necessary, or whether there are new developments on the ground that may be related to the Panel's now-concluded investigation. This reading is confirmed by the 2021 "*Framework for*

Proportionality Criteria and Modalities for Independent Verification of Management Action Plan Implementation" (the Verification Framework). It states that "*verification assesses the status (including completion) of specific Management actions in the MAP*" (emphasis added). In addition, the Panel verifies only the completion of the Bank's actions—not the Borrower's—and only those Bank actions designed to address harm that occurred as a result of the Bank's non-compliance. By contrast, Group Internal Audit can seek Board authorization to verify Management's actions in the MAP that are "*intended to address the Bank's governance, policy and procedures, and other internal operational arrangements for the oversight of environmental and social risks of Bank projects*." Group Internal Audit may also verify management action plan actions at the project level "*if Management actions refer to internal policies and practices of the Bank*." In the context of this MAP, this means the Panel may only seek verification of completion of one or more of the following actions:

- *With regard to the project financed by a Trust Fund, "Providing technical support to the Borrower for the preparation and submission of the project proposal to secure financing for these activities. Date: February 2025."*
- *With regard to the project financed by IDA, "Provide technical support to the Borrower for the preparation of the proposed IDA operation for Board consideration. Date: June 30, 2025."*
- *"Management will confirm that a strengthened GRM is in place through GRM reports (number and types of grievances lodged and addressed). Completed: November 6, 2024."*
- *"The Bank will support the Borrower, in collaboration with other development partners, to convene this workshop to discuss relevant good international practice on protected area management including on effective and responsible enforcement of restrictions; conflict avoidance, community engagement and benefit sharing. Date: May 31, 2025."*

- **Timing of verification**: For each Management action in the MAP for which the Panel seeks Board authorization to verify implementation, the dates by which the Panel intends to (a) start its verification, and (b) complete its verification. The Verification Framework states that, "*to ensure efficiency of the verification process, it is important to have a timeline for verification based on timelines of agreed actions to avoid premature review of actions*."

    - Start: The Panel should make clear to the Board that it will not begin verification of actions until they are completed. Any earlier Panel involvement relating to those actions would amount to monitoring, supervision, or advice and thereby exceed the scope of the Resolution.
    - Completion: In addition, the Panel should conclude its verification of each action soon after its completion. Since the Panel's role under the Resolution is to verify the status (including completion) of the action, rather than its effects or effectiveness, there is no reason to delay completion of the verification process past the date of completion of the corresponding Management action in the MAP. In response to the Panel's final verification report to the Board, Management will

submit its follow-up, indicating its views on Panel's findings to the Executive Directors.

- **Modality of verification**: For each Management action in the MAP for which the Panel seeks Board authorization to verify implementation, the proposed modality of verification and the basis for this recommendation. Verification of the Management actions in this MAP does not require information that could be collected in the field. Nor would it be necessary or appropriate for the Panel to seek the views of the Requesters or the Oakland Institute, since their views are not material to an assessment of the completion of the Management actions in this MAP. On the contrary, verification of completion of all the Management actions in this MAP will be easily ascertainable based on information available to the Panel through a desk review (e.g. staff interviews, documentation for new operations, Grievance Redress Mechanism logs, workshop completion report).

Finally, the scope, timing, and modality of verification should be based on the "*proportionality criteria*" laid out in paragraph 50 of the Resolution and in the Verification Framework. We therefore assume the Panel will explain to the Board how those criteria informed each recommendation. Similarly, we assume the Panel will confirm to the Board, as part of its recommendation, what "*input*" it has received from Group Internal Audit in accordance with paragraphs 52-53 of the Resolution.

Annex C

Table of Findings of the Panel Investigation

Issue Area	Panel Observations and Findings
Chapter 2 – Involuntary Resettlement	
Identification of Project's Area of Influence	The Environmental Assessment Policy requires evaluation of a project's potential impacts in its area of influence, which it defines to include areas used for livelihood activities (hunting, fishing, grazing, gathering, agriculture, etc.). **The Panel finds Management's definition of the Project area of influence to include the four park areas and their surroundings is in compliance with OP 4.01, Annex A, paragraph 6**.
Environmental Assessment and Consideration of Social Aspects.	**The Panel finds that the Project documents did not adequately identify the extent of human settlement within the southern part of RUNAPA, i.e. all the villages in the Park as a result of GN-28 and GN-754. The Panel finds that the Project is not in compliance with OP 4.01, paragraph 3, for not sufficiently considering the social risks in the southern part of RUNAPA, including the risk of resettlement**. The Panel notes that in March and April 2024, Management visited some of the five villages to understand better the social risks facing them.
Involuntary Resettlement from Land Take	The Panel observes that project documents reported earlier efforts of resettling people out of RUNAPA based on GN-28, and that these had been discontinued. The Panel, therefore, observes that the Bank was aware of the legacy issues but did not gather sufficient information on the villages and sub-villages remaining within the Park and the livelihoods sustained by Park resources. Without such information, the Bank was unable to identify the extent of the livelihoods impacts resulting from enforcement of Park boundaries. The Panel observes that during project implementation there was evidence of resettlement planning for communities living in the Park. The Panel further observes that the Government and the Bank had agreed that any resettlement taking place in the Park during the life of the Project would comply with the Bank's Involuntary Resettlement Policy. The Panel notes that for non-Project related resettlement in the Project area the RPF was to be used on a voluntary basis for Government-sponsored involuntary resettlement activities. The Panel observes that in this case, and in the context of park management across RUNAPA, the application of the resettlement instruments is mandatory for all involuntary resettlement and/or loss of assets or

	access to assets and livelihoods within the Project area during the life of the Project, even if Project documents state that it is voluntary. **The Panel finds that while a RPF was prepared for the Project, early resettlement activities were underway without its use or the application of other Bank Involuntary Resettlement Policy provisions relating to physical resettlement. The Panel finds this is not in compliance with OP 4.12, paragraph 3(a)**.
Involuntary Resettlement – Restriction of Access to Legally Designated Parks	The Panel observes that although the Project included a Process Framework, until March 2024 Management did not identify that Project support to park management would increase the enforcement of restriction of access with implications for livestock grazing and other resource uses from within the Park. Moreover, the Project's Process Framework was not designed to cover the Project area in its entirety nor was it used to help mitigate negative impact on livelihoods. **The Panel finds that Management did not recognize that Project support of park management would invariably restrict access to legally designated parks, including the southern part of RUNAPA, and that this could result in adverse impacts on livelihoods linked to the Project. Thus, the Panel finds the Project is not in compliance with OP 4.12 paragraph 3(b)**.
Chapter 3 – Park Management and Law Enforcement	
Assessment of the Implementing Entity's Capacity and Consideration of Human Health and Safety; and Social Aspects as a result of Project Activities	The Panel observes that, during Project preparation, background information on serious incidents committed by TANAPA prior to the Project and in relation to restriction of access was publicly available. The Panel also observes that the Project identified existing and ongoing conflicts in RUNAPA, principally related to Park boundary changes and restriction of access. Furthermore, in November 2018, TANAPA officially adopted a paramilitary system. The Panel reviewed the capacity assessment of the Project's implementing agencies conducted by the MNRT which the Project used to deem TANAPA's capacity adequate. The Panel observes that this assessment did not evaluate TANAPA's mandate and legal framework, its law enforcement role for the management of national parks, and the implications of its activities on the health and safety of community members. The Panel also observes that the Project's lack of consideration of these aspects, especially as it was supporting patrolling with equipment, is a serious omission which led to no specific measures being identified to address potential weaknesses in TANAPA's capacity. For these reasons **the Panel finds the Project is not in compliance with the IPF Policy, paragraph 5, which requires the Bank to**

	assess the appropriateness of the needs and capacity of the borrower and any project implementation entity. The Panel also finds the Project is not in compliance with the Bank's Environmental Assessment Policy, OP 4.01, paragraph 3, which requires a project to take into account human health and safety and the institutional capabilities related to the environmental and social aspects. The Panel further observes that the Project provided equipment and infrastructure to improve TANAPA's ability to patrol RUNAPA and to combat illegal activities, including cattle grazing. Given the history of conflict in relation to the management of and the restriction of access to national parks and other PAs, the Panel also observes that TANAPA personnel would be expected to engage people in RUNAPA and there could be associated risks of serious incidents occurring. The Panel observes that no mitigation measures to manage this risk were included in Project documents.
Assessment of Project-related Risks Resulting from Park Management and Law Enforcement	The Panel observes that the Project did not adequately consider that several registered villages, with thousands of people whose livelihoods depend on resources located inside the Park boundary, live in and around RUNAPA. The Panel also observes that the Project did not adequately consider the implications of pre-existing conflicts over the use of Park resources. The Panel further observes that the Project did not consider that, by supporting TANAPA's patrolling capacity, it contributed to an increased risk of conflict as well as involuntary resettlement arising from restriction of access to legally designated parks. **Therefore, the Panel finds that Management did not adequately assess the Project risks in the Project area of influence as they relate to these observations, which increased the exposure of communities to the potential use of excessive force by TANAPA rangers. As such, the Panel finds the Project is not in compliance with IPF Policy, paragraph 4, which requires a project to take into account social considerations, and related risks. The Project is also not in compliance with the Environmental Assessment Policy, OP 4.01, paragraph 2, and the Involuntary Resettlement Policy, OP 4.12, paragraph 3(b).**
Chapter 4 – Project Supervision	
Bank's Supervision of the Project	The Panel observes that the Bank undertook regular, biannual supervision visits. In addition, the Bank conducted four interim missions that reported progress on environmental and social implementation performance. The Panel observes, however, that although social specialists were included on missions, they narrowly focused on the implementation of Component 2 in the priority villages outside the national parks. The Panel also observes that after

	the allegations of TANAPA's use of excessive force against community members were first made in April 2023 to Management, the composition of the Bank supervision team did not include relevant expert support. **The Panel finds the expertise engaged during supervision was not commensurate to the risks and reported allegations of involuntary resettlement and the use of excessive force until December 2023**. **The Panel also finds that before December 2023, Management supervision was insufficient and did not recognize that an involuntary resettlement process had been initiated. Management also did not identify or record the serious reports of excessive violence, including during cattle seizures related to restriction of access to legally designated parks and other incidents. The Panel finds this is not in compliance with Bank Policy on Investment Project Financing, paragraph 20**.
Bank's Exercise of Remedy in Relation to Borrower's Contractual Obligations	The Panel observes that, following the March 2024 supervision mission, Management suspended the Project on April 18, 2024. **The Panel finds Management in compliance with the Bank's policy on Investment Project Financing, paragraph 27 (December 2021), for having exercised the Bank's legal remedy by suspending disbursements of unwithdrawn amounts of the Bank Loan.** The Panel observes that while the intent of the suspension of disbursement is to bring the Project back into compliance with Bank policies, the Panel notes that the measures suggested to lift the suspension may not fully address the shortcomings of this Project identified by this investigation.