

Complaint (Request for Inspection) Form

To:

The Chair, Inspection Panel

The World Bank Accountability Mechanism, MSN: MC 10-1007, 1818 H St., NW, Washington, DC 20433, USA.

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(Please answer the questions below as best as you can. Once the form is submitted, we will contact you to collect any additional necessary information.)

Section 1: Complaint

1. What harm do you believe the World Bank-financed project caused or is likely to cause to you or your community? Please describe in as much detail as possible.

Through the Resilient Natural Resource Management for Tourism and Growth (REGROW) Project, the World Bank is working 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.” However, 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.

1. EVICTIONS. 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 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.

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 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.

2. EXTRAJUDICIAL KILLINGS & HUMAN RIGHTS ABUSES. 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 & 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.

On April 23, 2021, RUNAPA rangers reportedly shot and killed a fisherman named [\(25\)](#) and [\(14\)](#). The same day, rangers allegedly killed two herders, [\(32\)](#) and [\(14\)](#). Member of Parliament (MP) for Mbarali, [\(14\)](#), called for investigation into the involvement of RUNAPA rangers in these murders as well as the circumstances of the death of [\(32\)](#) and the disappearances of [\(14\)](#) and [\(14\)](#). 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).

On May 6, 2023, 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. On May 11, 2023, the Mbarali MP ██████, [alerted the Tanzanian National Assembly](#) on these events and detailed the severity of the situation. According to Mr. ██████, “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.”

3. CATTLE SEIZURES. 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 “enhancing local economic benefits from tourism.”

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, ██████, [openly admitted](#): “We have captured 12,758 cattle in the park in year 2021/2022,” and that “We collected over TSh1.2 billion... [pastoralists] pay these fines very fast. They could bring loads of money if we told them to.”

During the aforementioned TANAPA ranger violence in ██████ and ██████ 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.

Testimony of MP ██████ detailing the violence and cattle seizure on May 6, 2023, is available here: <https://www.youtube.com/watch?v=k6tZCo4ZVIg>

Several large cattle seizures from September to December 2022 alone include:

- September 14-24, 2022 – [3,492 cattle](#) were seized in an 11-day period, allegedly for grazing within the Ifefu wetlands. Owners were forced to pay fines for the return of their cattle.
- November 22, 2022 – RUNAPA rangers seized 172 cattle in Mbarali district, belonging to ██████. Even though Mr. ██████ showed up and the Mbarali district court issued an injunction stating that the cattle should not be auctioned off, the cattle were still sold.
- December 2, 2022 – 93 cattle from ██████ village (located south of RUNAPA) belonging to two pastoral families were auctioned off with the permission of the Mbarali district court.
- December 7, 2022 – Rangers captured 293 cattle including 280 belonging to ██████, a ██████, in ██████ informed the ██████ 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.
- December 19, 2022 – rangers captured 140 animals at ██████ 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.

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.

“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.”

2. What is the name of the World Bank project? (If known)

Resilient Natural Resource Management for Tourism and Growth (REGROW) Project

3. Where is the World Bank project located? (Please include country name)

Tanzania

4. Do you live in the project area?

Yes

5. Have your concerns previously been reported to the World Bank? If yes, please provide the details about those communications and explain why you are not satisfied with the Bank's response.

On April 5, 2023, the Oakland Institute sent a letter to several World Bank staff members* sharing the concerns detailed 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.

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 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 Magafuli [called](#) GN 28 a "a serious blunder" and promised that "this will never happen." However, Magafuli did not cancel GN No. 28 and died with his promise in March 2021.

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.

Third, the Bank claimed the grievance mechanism has not received any complaints related to 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.

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.

Fifth, the Bank attempts to distance itself from the alleged abuses committed by TANAPA 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.

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 [REDACTED] 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.

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 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.

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.

* [REDACTED]
[REDACTED]
[REDACTED]

6. If known, please list the World Bank’s operational policies procedures you believe have not been followed.

The aforementioned forced evictions, set to occur without meaningful consultation and disclosure of project documents, violates the following World Bank operational policies:

- Environmental Assessment (OP/BP 4.01)
- Physical Cultural Resources (OP/BP 4.11)
- Involuntary Resettlement (OP/BP 4.12)
- Natural Habitats (OP/BP 4.04)
- Forests (OP/BP 4.36)

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 consultations were conducted with the affected Indigenous communities in the project area.

7. Do you expect any form of retaliation or threats for filing this complaint?

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.

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 [REDACTED] [waited for hours in vain](#) for the Mission. [REDACTED] 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. [REDACTED] [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](#).

Therefore, given the pervasive climate of fear that exists in Tanzania for speaking out against the government, we authorize [REDACTED] of the Oakland Institute, to be our advisor and provide us support during this process. We request that all communication and correspondences related to this process be copied to Oakland Institute, who will keep us informed.

8. In addition to receiving information about the Compliance investigation process, would you also like to receive information about the option of dispute resolution?

Yes.

Section 2: Contact Information

9. Are you complainants or a representative of complainants*?

Complainants: Representing a complainant or community: Other: (Please explain)

We do not have a local CSO representative who can represent us as there is extreme fear of reprisals. Therefore, we authorize [REDACTED] from the Oakland Institute to provide us support and advice throughout our engagement with the complaint process. We request that all communications and correspondences are also copied to the Oakland Institute, who would communicate to the Inspection Panel on our behalf and keep us informed.

10. Would you like your name and contact details to be kept confidential? (We will not disclose your identities to anyone without your prior consent.) Yes No

11. Complainants' or representatives' names (minimum two names and signatures are required):

	Complainant /Representative 1	Complainant /Representative 2	Complainant /Representative 3
Name	[REDACTED]		
Address	[REDACTED]		
Phone	[REDACTED]		
Email	[REDACTED]		

12. By completing and submitting this form, we authorize the Inspection Panel to investigate the issues as described in this form.

Signature 1	Signature 2	Signature 3
[REDACTED]	[REDACTED]	[REDACTED]

Signatures (more signatures can be sent as an attachment)

Your personal data will only be used and disclosed for the purpose for which it was collected in accordance with the WBG Data Privacy Policy. Inspection Panel will not disclose information provided by complainants that may reveal their identity outside of responsible World Bank units without their consent.

NOTES:

- **If you are a representative of complainants, we will need a letter from the complainants authorizing you to represent them.*
- *Please attach supporting documents, if available.*
- *If you have any difficulty in completing the form, please contact the World Bank Accountability Mechanism at Email: ipanel@worldbank.org or by phone: +1-202-458-5200.*

Supporting Documents:

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

Supporting documents are available at the Inspection Panel upon request.