

REPORT No. 198067-UG

THE INSPECTION PANEL

REPORT AND RECOMMENDATION
ON A
REQUEST FOR INSPECTION

UGANDA

INVESTING IN FORESTS AND
PROTECTED AREAS FOR
CLIMATE-SMART DEVELOPMENT
PROJECT (P170466)

JANUARY 8, 2026

**The Inspection Panel Report and Recommendation
on a
Request for Inspection
Uganda: Investing in Forests and Protected Areas
for Climate-Smart Development Project
(P170466)**

A. Introduction

1. On August 29, 2025, the Inspection Panel (the “Panel”) received a Request for Inspection (the “Request”) related to the Uganda: Investing in Forests and Protected Areas for Climate-Smart Development Project (P170466) (the “Project”). The Request was submitted by two Batwa individuals residing near a Protected Area (PA) within the Project area. The Requesters have been authorized to speak for Batwa communities living around the Bwindi Impenetrable National Park and Mgahinga Gorilla National Park. The Requesters asked for confidentiality claiming serious threats and intimidation against them.

2. The Request alleges the World Bank (the “Bank”)-financed Project is perpetuating historical injustices against the Batwa people. It claims the Project has excluded the Batwa from meaningful participation and alleges Project consultations were not “*proper*” indigenous consultations. The Request also alleges that the Bank’s “*acceptance of unauthorized representation*” is interfering with the Indigenous Peoples consultation process and that the Project has not applied the Bank’s Environmental and Social Standard: Indigenous Peoples/Sub-Sharan African Historically Underserved Traditional Local Communities (ESS7) – specifically the requirements for Free, Prior, and Informed Consent (FPIC).

3. The Request states the Project presents an opportunity for co-management and sharing of revenues generated from tourism that could support the livelihoods of the Batwa people but alleges the Project is systematically excluding the Batwa from such benefits, further marginalizing them, and disregarding their traditional forest knowledge and cultural practices. Moreover, the Request claims the Project funds tourism initiatives that exploit Batwa culture but excludes Batwa communities from revenue-sharing associated with tourism. Furthermore, the Requesters raise serious concerns about their safety in connection with the Project.

4. The Panel registered the Request on September 16, 2025, and Management submitted its response (the “Management Response” or the “Response”) to the Request on December 1, 2025. A Panel Team (the “Team”) visited Uganda on November 6–11, 2025, and December 1–6, 2025, to inform its Report and Recommendation to the Board of Executive Directors (the “Board”) as to whether an investigation into the matters alleged in the Request is warranted.

5. Based on the information provided in the Request and the Management Response, as well as during the meetings held with various stakeholders in Uganda, the Panel has determined that the Requesters and the Request for Inspection meet the technical eligibility criteria set forth in the Resolution.

6. The Panel determined a plausible link between the Requesters’ allegation respective the Project perpetuating the marginalization and exclusion of the Batwa in relation to their ancestral claim to access natural resources in the forests from which they were evicted.

Although the Project recognizes the ancestral claims of the Batwa, the Panel is unclear whether the measures put in place and their implementation have achieved the protection of the Batwa's rights to access forest natural resources as per the requirements of the Bank policies.

7. Based on its assessment below, the Panel recommends an investigation into the Bank's compliance with the Bank's Environmental and Social Policy for Investment Project Financing and related standards (especially Environmental and Social Standards 7 and 10), the Bank's Directive on Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups, and the Bank's Policy on Investment Project Financing.

8. The Panel agrees that claims related to compensation, land, and restitution for historical evictions fall outside the Project's scope and its mandate. It also agrees that the alleged harm associated with tourism-related revenue-sharing schemes is not directly linked to the Project. Hence, the Panel does not recommend these allegations for investigation.

B. Description of the Project

9. The Project was approved by the Board of Executive Directors of the International Development Association (IDA) on April 23, 2020. The Project's financing is a total of US\$ 148.2 million equivalent provided through an IDA credit of US\$ 78.2 million and a grant from the IDA18 Refugee Sub-Window amounting to US\$ 70 million, and the Government of Uganda (GoU) is covering the remaining US\$ 30 million. The expected Project Closing Date is June 30, 2026.

10. According to the Project Appraisal Document (PAD), the Project was formally launched in March 2022.¹ The Project has been restructured twice. The first restructuring was approved in December 2024 to "*finetune*" Project objectives and improve the Project's geographical scope by excluding one Protected Area (PA). The second restructuring was approved in November 2025, adjusting the scope of activities to allow more efficient utilization of Project resources within the remaining Project period; it reflected changes in the results framework, further finetuned the definition of the Project target landscapes, and supported mitigation of assessed risks related to Project support to infrastructure and equipment for PA management.² At the time the Request was received the Bank had disbursed US\$ 50.01 million, or 33.41% of the committed amount.³

11. The Project Development Objective, according to the PAD, is to "*improve the sustainable management of forests and protected areas and increase benefits to communities from forests in target landscapes.*"⁴ The Ministry of Water and Environment (MWE) is the coordinating ministry for the Project along with the main implementing agencies: the Uganda Wildlife Authority (UWA) and the National Forestry Authority (NFA).⁵

12. According to the PAD the Project has four components:⁶

¹ Management Response, pp. 1-2, para. 5.

² Management Response, pp. 1-2, para. 5.

³ Meeting with Management, October 1, 2025.

⁴ Project Appraisal Document (PAD), p. 1.

⁵ PAD, p. 2.

⁶ PAD, p.17, para. 38.

- Component 1 focuses on improving the management of government-managed forest and wildlife Protected Areas (PAs)⁷ to ensure they continue to generate revenues and provide environmental services. These PAs include National Parks (NPs) and Wildlife Reserves (WRs), with respective activities implemented by UWA and Central Forest Reserves (CFRs) which fall under the auspices of the NFA.⁸
- Component 2 aims to boost revenues and jobs from these forests through targeted investments in tourism and productive forestry in selected NPs and CFRs in the Project area, implemented respectively by UWA and the NFA.
- Component 3 seeks to improve landscape management in refugee-hosting areas outside PAs by increasing tree cover on host community land and promoting sustainable forest management and resilience on private and customary land, led by MWE with District Local Governments.
- Component 4 supports overall project management, reporting, and monitoring.

13. Components 1 and 2 are most relevant to the Request. Meanwhile, Component 3 focuses on refugee hosting areas in Uganda that are some distance from the PAs adjacent to which the Requesters and Batwa communities reside. Project progress on Components 1 and 2 has included:

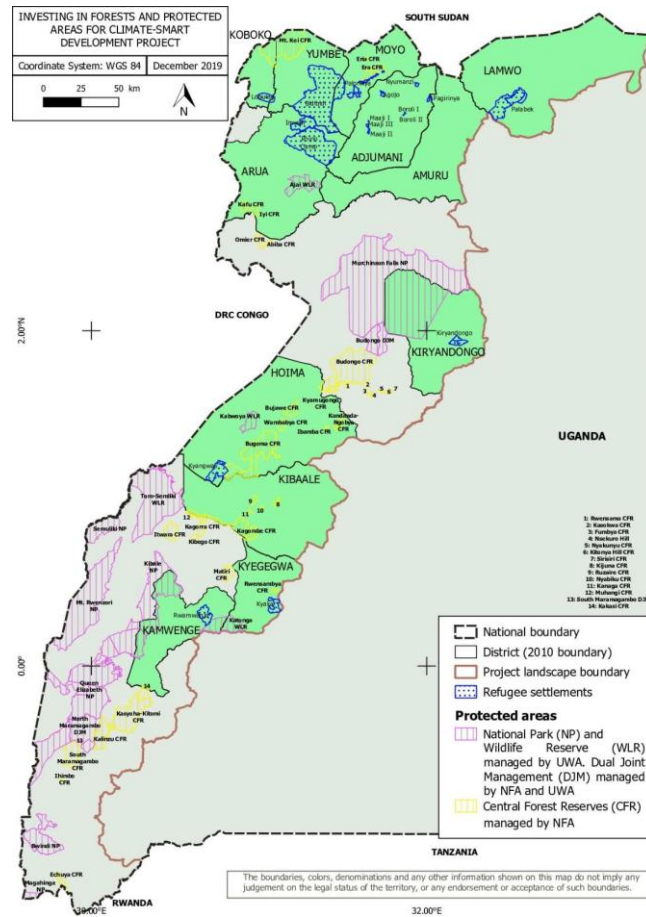
- Component 1: an increase in forest restoration programs; renewal and development of new Collaborative Resource Management (CRM) and Collaborative Forest Management (CFM) agreements, including providing equipment, materials, and training, and implementation of measures mitigating human-wildlife conflicts, including construction of a “Buffalo” wall at Mgahinga Gorilla National Park.
- Component 2: i) for tourism – formalization of contracts to construct new Visitor Information Centers, improvements to tourist booking systems and visitor experience, training for tourist staff in business management, and the establishment of new tourism trails, ii) for productive forestry – planning support for upgrading a new wood processing training facility and plans for expanding the scope of the forest processing industry subsidy scheme.

14. The PAD states the Project’s geographic focus is on selected, priority areas in western and northwestern Uganda. Target landscapes include the Albertine Rift, the refugee-hosting districts of the West Nile Region, and the Lamwo district within the Upper Nile Water Management Zone.⁹ Map 1 shows the Project area.

⁷ Protected Areas include National Parks, Wildlife Reserves, and Central Forest Reserves.

⁸ According to the Management Response (p. 2), the NFA was dissolved in August 2025. Its staff and functions have been absorbed into the Ministry of Water and Environment.

⁹ PAD, p. 16, paras. 37 and 38.



Map 1. The Project Area¹⁰

15. **Community access to Protected Areas.** The PAD explains that, in addition to improving infrastructure and equipment for the management of PAs, Component 1.2 of the Project also focuses on “*increasing the involvement of local communities in the management of forest and wildlife areas by increasing their access and benefits from these areas.*” As the means to achieve this objective, it mentions support to existing CRM and CFM agreements and the establishment of new such arrangements and associated community groups, targeting up to 75 new CRM groups and at least 28 new CFM groups, and support for livelihood activities within existing groups.¹¹ As a modality for “*regularizing access*” to Uganda’s PAs, CRM and CFM agreements have existed since the 1990s. The parties to such agreements are local CRM/CFM community groups,¹² and either UWA or MWE/NFA, as well as the relevant local government (district) authorities.

16. The Project’s Stakeholder Engagement Plan (SEP) identifies CRM/CFM community groups as primary Project stakeholders. The PAD mentions a Vulnerable and Marginalized Groups Framework (VMGF) guiding the Project’s site-level consultations with the Batwa.¹³ The VMGF states the “*Project benefit*” for the Batwa will be the “*increased protection of VMGs’ rights to access the forest natural resources and receive livelihoods support through*

¹⁰ PAD, Annex 3, p. 83.

¹¹ PAD, p. 22, para. 52.

¹² These community groups are also referred to as “Resource Use Groups,” led by “Resource Use Group Committees.” For CFM, Government authorities mentioned “Forest Use Groups” which are comprised of members of communities residing within a certain perimeter around PAs. CRM and CFM agreements are signed in the form of Memoranda of Understanding.

¹³ PAD, p. 36, para. 92.

CFM and CRM arrangements,” as well as providing the Batwa with job opportunities, including tourism-related employment.¹⁴ With the objective of fulfilling the Bank’s requirements stipulated in ESS7, the VMGF informed the development of four site-specific Vulnerable and Marginalized Groups Plans (VMGFs) aimed at delivering these “*benefits*” to the Batwa communities identified during early Project preparation and recognized as having collective attachment to the forests of the four PAs adjacent to which they live.

17. At the time of appraisal, the Project identified as applicable the following environmental and social standards: ESS1 Assessment and Management of Environmental and Social Risks and Impacts; ESS2 Labor and Working Conditions; ESS3 Resource Efficiency and Pollution Prevention and Management; ESS4 Community Health and Safety; ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement; ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources; ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities; ESS8 Cultural Heritage, and ESS10 Stakeholder Engagement and Information Disclosure.¹⁵

18. When the Project was approved the environmental and social risks rating was “*moderate*.” This changed to “*substantial*” on April 29, 2025.¹⁶ On June 13, 2025, the environmental and social risk rating was further increased to “*high*.”¹⁷ The Project’s overall risks rating is considered “*substantial*.”

C. Summary of the Request

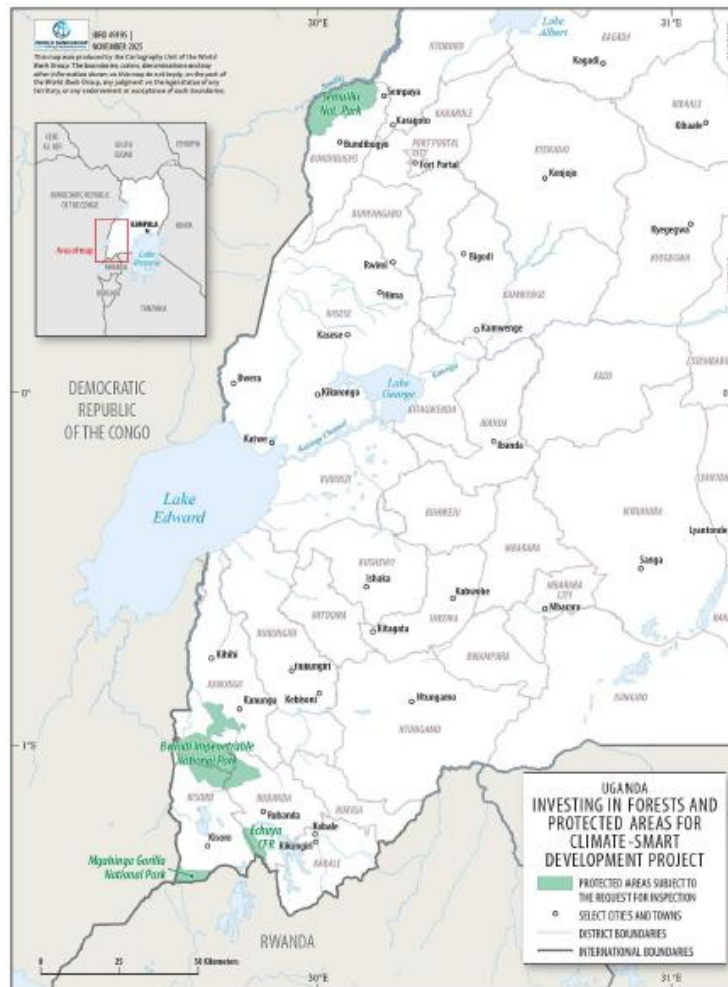
19. This section summarizes the issues raised in the Request which alleges the Project is adversely affecting Uganda’s Batwa communities who live adjacent to four of the PAs supported by the Project: the Bwindi Impenetrable National Park (“Bwindi”), Mgahinga Gorilla National Park (“Mgahinga”), Semuliki National Park (“Semulika”), and Echuya Central Forest Reserve (“Echuya”). The Requesters live south and adjacent to Bwindi. Map 2 shows the locations of these PAs.

¹⁴ Vulnerable and Marginalized Groups Framework (VMGF) 2020, page 35.

¹⁵ PAD, p. 4.

¹⁶ Implementation Status & Results Report (ISR), Sequence 8, p. 2.

¹⁷ ISR, Sequence 9, p. 2.



Map 2. The PAs relevant to the Request¹⁸

20. The Request claims five broad categories of alleged harm (the full Request for Inspection is attached to this Report as Annex 1).

21. **Perpetuation of historic injustices against the Batwa people and their exclusion from participation in co-management arrangements and benefit-sharing.** The Request alleges that, in the absence of proper consultation, the Project is “*replicating and furthering historical injustices against the Batwa people,*” who, in 1991, were forcibly evicted from forests to which they lay ancestral claims, without receiving any compensation. It claims the Project is perpetuating their landlessness and the economic exclusion and marginalization of Batwa people because – “*without proper consultation*” – Requesters were not allowed to negotiate co-management arrangements or benefit-sharing that could provide sustainable livelihoods for their communities. The Request adds that the Project “*could transform Batwa livelihoods through genuine partnership*”, but instead it is entrenching economic exclusion and marginalization of Batwa people.

22. **Exclusion from meaningful participation in the Project.** The Request alleges that, although the Project offers an opportunity for co-management and benefit-sharing that could provide sustainable livelihoods for Batwa communities, the Batwa people instead have been systematically excluded from benefit-sharing and from meaningful participation in the Project.

¹⁸ Management Response, p. 6.

23. **“Unauthorized representation” during consultations.** The Request alleges that the Project’s consultation framework treats Indigenous People as “*general ‘civil society’*,” and is not applying ESS7 – specifically its requirements for meaningful consultation and FPIC. It claims Project consultations have been conducted with “*unauthorized representation*,” including consulting non-indigenous people who interfere with indigenous consultation processes. The Request adds that these consultations have damaged relations between Batwa leaders and settlements, weakening their collective voice and the unity of the Batwa people. The Request also claims that by conducting consultations without proper indigenous representation, the Project legitimizes the ongoing exclusion of the Batwa people from their traditional territories and resources.

24. **Disregarding traditional forest knowledge and cultural practices while exploiting Batwa culture.** The Request claims the Project ignores the Batwa people’s traditional forest knowledge and cultural practices, which the Requesters believe could benefit both conservation outcomes and tourism development. The Request alleges that, instead, the Project funds tourism initiatives that exploit Batwa culture and support systematic cultural assimilation. The Request states Bank-funded tourism initiatives use Batwa individuals to perform cultural practices for tourists as a commodified resource, while UWA and non-Indigenous People collect the revenues. It states these revenues are not meaningfully shared with the Batwa people who are otherwise barred from practicing their culture in furtherance of their identity and heritage.

25. **Community safety and intimidation.** The Request alleges that attempts by the Requesters to assert their rights have resulted in intimidation and concerns for the safety of their representatives. According to the Request, the Requesters were ultimately forced to withdraw from the Project’s process in July 2025 due to serious safety concerns and violations of Indigenous Peoples rights, noting that the Project continues to operate without proper indigenous consultation.

D. Summary of Management Response

26. This section summarizes Management’s Response to the Request, in accordance with the six categories of alleged harm and associated headers identified therein (the full Response is attached to this Report as Annex II). It is to note here that, with respect to these six categories of harm, the Management Response links the Request’s concern about exclusion from participation in co-management arrangement and benefit-sharing to tourism-related revenue-sharing schemes. However, in the Panel’s view the Request does not reflect such a link.

27. **Alleged perpetuation of historical injustices against the Batwa people.** The Response states Management has carefully reviewed the issues raised in the Request and concluded that the adverse impacts raised largely result from developments that long predate the Project and have no connection to it.¹⁹ The Response recognizes the Batwa people were displaced from some areas where the Project is now being implemented²⁰ as well as the difficulties the Batwa communities face and that they are among the most marginalized groups in Uganda. However, the Response disagrees that the Project replicates or furthers the injustices against the Batwa people,²¹ stating the Project supports no activities that could affect the

¹⁹ Management Response, p. v, para. vi.

²⁰ Management Response, p. 7, para. 18.

²¹ Management Response, p. 14, para. 41.

Batwa’s claim to such areas, which is currently being adjudicated in the national courts.²² The Response also states “*it is not clear what harm the Project would have caused to any such communities.*”²³

28. The Response explains that most Batwa CSO representatives Management consulted have acknowledged that the legacy issue of the Batwa’s displacement is outside the remit of the Project and that these representatives appreciate the involvement of the Bank.²⁴ The Response notes that Project activities support livelihoods in communities around the four PAs to which the Request relates, targeting communities that include Batwa.²⁵

29. First, the Management Response states that Project benefits have been provided to the Batwa by supporting the maintenance and expansion of benefits through “*regularized access*” to resources in the PAs for local communities living adjacent to the PAs which also include Batwa. The Response explains this is achieved through the co-management approach that underpins the CRM and CFM agreements, through which the Project implementing parties – MWE, UWA, and NFA – partner with community groups to share responsibilities and benefits for the sustainable management of PA resources.²⁶ According to the Response, CRM and CFM agreements increase benefits for communities living adjacent to PAs by providing “*regularized access*” to resources inside such areas, while they also support livelihoods activities and household improvements that reduce the reliance of these neighboring communities on natural resources from the PAs.²⁷

30. The Management Response states that the Project’s proactive focus on expanding the involvement of local communities covers 37 PAs in the Project area, including seven NPs, three WRs, and 27 CFRs.²⁸ It explains that the Project has supported the renewal of CRM and CFM agreements and the establishment of new agreements for communities living adjacent to the NPs of Bwindi, Mgahinga, and Semuliki and the CFR at Echuya,²⁹ adding that the Project plans to support the development of additional agreements to facilitate resource access. The Response states that the Project has “*actively promoted increased Batwa participation*” in CRM and CFM arrangements and has helped the Batwa to have representation on the committees that represent CRM/CFM community groups.³⁰ According to the Response, the Batwa communities can access resources through these CRM and CFM arrangements.

31. Second, the Management Response states the Batwa derive “*tangible benefits*” from the PAs, mentioning “*sustainable harvesting and income-generating opportunities*” delivered through Vulnerable and Marginalized Groups Plans (VMGPs). These have been implemented from late 2023 to date.³¹

32. The Response describes the development of a Vulnerable and Marginalized Groups Framework (VMGF) during Project preparation, which has created the basis for developing

²² Management Response, p. 15, para.46.

²³ Management Response, p. 16, para. 47.

²⁴ Management Response, p. 15, para. 46.

²⁵ Management Response, p. 14, para. 41.

²⁶ Management Response, p. 3, para. 10.

²⁷ Management Response, p. 3, para. 10.

²⁸ Management Response, p. 4, para. 12, and its footnote.

²⁹ Management Response, p. 3, para. 10.

³⁰ Management Response, p. 15, para. 43. The Management Response refers to these as “Resource Use Group Committees.”

³¹ Management Response, p. 15, para. 45.

four specific VMGPs, one for each of the four PAs (Bwindi, Mgaharinga, Semuliki, and Echurya) adjacent to which Batwa communities are living.³² The Response also states the VGMF acknowledges the historical displacement of the Batwa, and that the Project has maintained specific consultations with them and designed specific interventions for them corresponding to their reliance on natural resources.³³

33. The Response states that, since implementation of the VMGPs, 230 Batwa community members have benefitted from direct Project support, including training and inputs to help diversify their sources of income. The Response notes that such training and inputs have included sewing, craft-making, beekeeping, tour guiding, enterprise development (mushroom and vegetable cultivation), as well as training in construction of fuel-efficient cookstoves.³⁴ The Response adds that other VMGP-supported benefits included 14 water tanks for rainwater harvesting for Batwa communities and the preparation of an inventory of medicinal herbs used by the Batwa under the leadership of Batwa community members.³⁵

34. The Management Response also notes that some activities requested by the Batwa could not be accommodated by the Project because they were outside the Project's scope. These requests included land purchases for Batwa communities, renegotiation of existing revenue-sharing schemes between local government, UWA, and Batwa communities, and allowing Batwa-led CSOs to receive single-source contracts to carry out some activities the Project procures.³⁶

35. **Alleged exclusion from meaningful participation in the Project.** The Management Response states that dedicated consultations with the Batwa communities and their representatives, in line with Bank policy requirements in ESS7, have been carried out during Project preparation and implementation.³⁷ It states there is “*no indication or evidence that Batwa were excluded from Project consultations and participation.*”³⁸ The Response also states that, in addition to including Batwa communities in meaningful consultations in the Project area, the Project is making its benefits accessible to the Batwa communities.³⁹ The Response notes the Project worked with Batwa CSOs as well as the District Community Development Officers⁴⁰ to ensure consultations capture all Batwa stakeholders, claiming these consultations have reached about 10% of the Batwa population in Uganda.⁴¹

36. The Management Response notes that the VGMF consultations took place in 2020 with 254 Batwa community members and that 467 Batwa and 87 partners participated in the first VMGP consultations in 2021 and 2022.⁴² The Response also notes that the four VMGPs currently being implemented are being updated following further consultations with the Batwa and their representatives between April and October 2025. It adds that “*further consultation and verification workshops*” will be held in December 2025 with the Batwa communities and CSOs working with them to inform the finalization of the four updated VMGPs and their

³² Management Response, p. 16, para. 50.

³³ Management Response, p. 8, para. 21.

³⁴ Management Response, p. 15, para. 45.

³⁵ Management Response, p. 15, para. 45.

³⁶ Management Response, p. 22, para. 73.

³⁷ Management Response, p. 16, para. 49.

³⁸ Management Response, p. 18, para. 56.

³⁹ Management Response, p. 15, para. 47.

⁴⁰ Management Response, p. 18, para. 57.

⁴¹ Management Response, p. 18, para. 56.

⁴² Management Response, p. 16, para. 50.

implementation, as well as to provide Batwa communities with feedback on what the Project can address and take on board until it closes.⁴³ The Response also notes that during the second restructuring discussions, the Project implementing parties requested re-allocation of funds from the Bank’s financing to further scale up livelihood activities to benefit Batwa communities.⁴⁴

37. **Alleged “unauthorized representation” during consultations.** The Response states Management is aware of disagreements and competing leadership claims within Batwa communities but notes that this issue predates the Project and was not caused by it.⁴⁵ The Response recognizes the Batwa people residing in Uganda are a diverse group of an estimated 4,000 individuals, most of whom live in communities adjacent to the four PAs.⁴⁶ They have no single leader or joint representation, and no organization that is recognized to represent them as an ethnic group in their entirety.⁴⁷ It adds that there are numerous NGOs and CSOs, both Batwa-led and non-Batwa-led, who play some role in supporting Batwa communities.⁴⁸ The Response states that Project-related consultations focused on the broad consultation requirements of ESS7 and ESS10, which were intended to give stakeholders an opportunity to express their views on the Project.⁴⁹

38. The Response is of the view that the Requesters’ desire to address historic injustices appears “to conflate Project-related consultations with formally mandated political representation of the Batwa”.⁵⁰ It states that the ongoing dispute about “legitimate representation” had spilled into the Project when Requesters demanded that the Project stop engaging with other CSOs which they viewed as “unauthorized” stakeholders.⁵¹ The Response states the conflict over representation seems to stem from some Batwa-led organizations not recognizing the legitimacy and value of the Government and the Bank engaging organizations for the Project that are not Batwa-led.⁵² The Response states the Bank has advised its Government counterparts to pursue engagement that is “as broad and inclusive as necessary to include all relevant stakeholders, either identifying as Batwa or seeking to support the Batwa.”⁵³ It adds that the Stakeholder Engagement Plan (SEP) has recently been revised and updated to incorporate lessons learned during Project implementation (disclosed in November 2025).⁵⁴ Furthermore, the Bank and the Project remain open to dialogue with all Batwa stakeholders,⁵⁵ and the Project seeks to ensure that consultations are conducted with all parties that recognize themselves as Batwa without prejudice against any group.⁵⁶

39. The Management Response notes FPIC as provided for under ESS7 was not required, because the Project’s design and the Project activities would not cause relocation or impact land and natural resources subject to traditional ownership or that is under customary use or

⁴³ Management Response, p. 16, para. 51.

⁴⁴ Management Response, p. 17, para. 52.

⁴⁵ Management Response, p. 19, para. 63.

⁴⁶ Management Response, p. 9, para. 25.

⁴⁷ Management Response, p. 20, para. 64. According to the Management Response, this number is based on the National Population and Housing Census 2024 of the Republic of Uganda.

⁴⁸ Management Response, p. 20, para. 65.

⁴⁹ Management Response, p. 19, para. 62.

⁵⁰ Management Response, p. 20, para. 66.

⁵¹ Management Response, p. 20, para. 66.

⁵² Management Response, p. 20, para. 67.

⁵³ Management Response, p. 21, para. 67.

⁵⁴ Management Response, p. 18, para. 58.

⁵⁵ Management Response, p. 21, para. 67.

⁵⁶ Management Response, p. 21, paras. 67 and 68.

occupation, and the Project will cause no significant impacts to the Batwa people's cultural heritage.⁵⁷ The Response adds that Batwa communities retain access to the four PAs for cultural practices and the sustainable harvesting of natural resources.

40. **Alleged missed opportunity for co-management and sharing of revenues generated from tourism.** The Management Response links Requesters' concerns about exclusion from participation in co-management arrangement and benefit-sharing to tourism-related revenue-sharing schemes. The Response states the Project did not develop or support the tourist products co-managed by UWA and local Batwa groups under these existing benefit-sharing schemes.⁵⁸ The Response clarifies that the Government's tourism revenue-sharing schemes referenced in the Request are entirely separate from the Project and that the Project is not responsible for their design or benefit distribution.⁵⁹ Management is of the view that the Request is taking issue with some Government schemes for tourism revenue-sharing that are separate from and unrelated to the Project.⁶⁰ The Response also notes that the Project "*does not provide support to programs to the Batwa trail in Mgahinga or the Batwa experience in Bwindi*" which are co-managed by UWA and local Batwa groups.⁶¹

41. **Alleged disregard of Batwa traditional forest knowledge and cultural practices while exploiting Batwa culture.** The Management Response states the Project made efforts to help identify the priorities expressed by Batwa communities during Project engagements.⁶² Management states the VMGPs illustrate the inclusion of Batwa traditional forest knowledge and cultural practices. It emphasizes that Batwa communities requested an inventory of indigenous medicinal plants, which was completed in 2025 for Bwindi, Mgahinga, and Semuliki and is now being translated and printed for their exclusive use with Project support.⁶³ The Response also states that the Project does not involve or support the commercial use of Batwa cultural heritage by non-Batwa. It adds that the activities alleged to exploit Batwa culture cited in the Request, such as cultural performances, are unrelated to Project interventions.⁶⁴

42. **Alleged reprisals and intimidation.** The Management Response emphasizes that the Bank does not tolerate reprisals or retaliation.⁶⁵ The Response notes that Management and Project counterparts sought to engage regularly with the Requesters from November 2024, after their complaint to the Bank was submitted, and the first time the Bank was informed of intimidation concerns was on July 14, 2025. The Response added the Requesters asked the Bank to cease contact with them on August 15, 2025.⁶⁶ The Response states Management brought the concerns of reprisals to the attention of senior Government officials and reminded them that the Bank does not tolerate any kind of retaliation in the projects it finances and asked that all parties involved in the Project be reminded of this.⁶⁷

⁵⁷ Management Response, p. 19, para. 61.

⁵⁸ Management Response, p. 21, para. 69.

⁵⁹ Management Response, p. 23, para. 76.

⁶⁰ Management Response, p. 21, para. 69.

⁶¹ Management Response, p. 21, para. 70.

⁶² Management Response, p. 22, para. 71.

⁶³ Management Response, p. 22, para. 72.

⁶⁴ Management Response, p. 22, para. 74.

⁶⁵ Management Response, p. 23, para. 78.

⁶⁶ Management Response, p. 23, para. 79.

⁶⁷ Management Response p. 23, para. 80.

E. Panel’s Eligibility Assessment, Observations, and Review

43. The Panel’s review is based on information presented in the Request, the Management Response, other relevant documentary evidence, and information gathered through conversations with different stakeholders during two visits to Uganda.

44. A Panel Team consisting of Senior Environmental Specialist Richard Wyness, Investigation Officer Camila Jorge do Amaral, and Research Analyst Dion Lorenz Romano conducted a first visit to meet with Requesters and Batwa communities in the Kisoro district in southwest Uganda on November 6–9, 2025. During this visit the Panel Team held meetings with representatives of three Batwa-led organizations who have engaged with the Project – two of whom submitted the Request – and it visited four Batwa communities.

45. Panel Member Evelyn Dietsche (Lead Inspector), Senior Environmental Specialist Richard Wyness, and Investigation Officer Camila Jorge do Amaral made a second visit to Kampala on December 2–5, 2025. During this visit the Panel Team met with the Ministry of Finance, Planning and Economic Development, the MWE, the Ministry of Tourism, Wildlife and Antiquities, the UWA, and the NFA. The Panel Team also met with Bank Management.

46. The Panel expresses its appreciation to all parties with whom it met, and all who provided valuable information and shared their views openly. The Panel extends particular thanks to the World Bank Country Office staff in Uganda for its assistance with logistics arrangements for the Panel Team’s visits to the country and for their guidance and advice, especially on safety protocols. The Panel also acknowledges that, on January 5, 2026, Management submitted to the Panel revised versions of the four site-specific VMGPs, prepared by MWE and dated December 2025.

47. The following sections cover the Panel’s determination of the technical eligibility of the Request in accordance with the criteria set forth in the Panel Resolution (subsection E.1.), observations on other factors (subsection E.2.), and the Panel’s review (subsection E.3.) which supports the Panel’s recommendation.⁶⁸

E.1 Determination of Technical Eligibility

48. The Panel is satisfied that the Request meets all six technical eligibility criteria set out in its Resolution.⁶⁹ The Panel notes that technical eligibility is based on verifiable facts which relate to the allegations in the Request. The Panel notes that its confirmation of technical eligibility is not an assessment of the substance of the claims made in the Request.

- **Criterion (a):** “*The affected party consists of any two or more persons with common interests or concerns and who are in the borrower’s territory.*” The Request was submitted by two Batwa individuals who live in the Borrower country and have been authorized to speak for Batwa communities living around the Bwindi and Mgahinga. The Team met with the Requesters, as well as with members of four Batwa communities around the Bwindi and Mgahinga. The Panel therefore considers this criterion met.

⁶⁸ World Bank Inspection Panel, [Resolution No. IBRD 2025-0001 and Resolution No. IDA 2025-0001](#) (the “Resolution”), paras. 13-15 and 29.

⁶⁹ The Resolution, paras. 13-15 and 29

- **Criterion (b):** *“The Request does assert in substance that a serious violation by the Bank of its operational policies and procedures has or is likely to have a material adverse effect on the Requester.”* While not all claims in the Request directly relate to the Project, some are plausible and potentially inter-linked. The Panel agrees that claims related to compensation, land, and restitution for historical evictions fall outside the Project’s scope and its mandate. It also agrees that the alleged harm associated with tourism-related revenue-sharing schemes is not directly linked to the Project.

The Panel observes that there is a plausible link between the Requesters’ allegation respective the Project perpetuating the marginalization and exclusion of the Batwa in relation to their ancestral claim to access natural resources in the forests from which they were evicted. The Panel notes that the Project’s VMGF recognizes this attachment as the communal rights of the Batwa, and it states these rights as the basis for developing and implementing site-specific VMGPs in meeting the Bank’s requirements under ESS7. There may also be a plausible link between the outcomes of Project-support for tourism expansion and the alleged exploitation of Batwa culture.

- **Criterion (c):** *“The Request does assert that its subject matter has been brought to Management’s attention and that, in the Requesters’ view, Management has failed to respond adequately demonstrating that it has followed or is taking steps to follow the Bank’s policies and procedures.”* The Panel received earlier correspondence between the Requesters and the Bank concerning the issues raised in this Request. The Request states Requesters had sent “*formal petitions*” to the Bank regarding their concerns in October 2024, and that they communicated with Bank staff from October 2024 to July 2025. Therefore, the Panel is satisfied that the issues raised in the Request were brought to the attention of the Bank prior to submission of the Request for Inspection. Based on this information, the Panel considers this criterion met.
- **Criterion (d):** *“The matter is not related to procurement.”* The Request does not raise issues of procurement and thus this criterion is met.
- **Criterion (e):** *“For projects approved by the Executive Directors before the date of this Resolution [September 8, 2020], the related loan has not been closed or substantially disbursed or for projects approved by the Executive Directors on or after the date of this Resolution fifteen months have not yet passed from the date the related loan has been closed.”* At the time of receipt of the Request, the Project was active, and 33.41% disbursed. The Project was approved on April 23, 2020, and the expected closing date is June 30, 2026. The Panel considers this criterion met.
- **Criterion (f):** *“The Panel has not previously made a recommendation on the subject matter or, if it has, that the Request does assert that there is new evidence or circumstances not known at the time of the prior Request.”* The Panel considers this criterion met as the Panel has not previously made any recommendations on the subject matter raised in the Request.

E.2 Panel Observations Relevant to its Recommendation

49. In making its recommendation to the Board on whether an investigation is warranted, and consistent with paragraph 45 of its Operating Procedures,⁷⁰ the Panel considers the following:

- whether there is a plausible causal link between the harm alleged in the Request and the Project,
- whether the alleged harm and possible non-compliance by the Bank with its operational policies and procedures may be of a serious character,
- whether Management, in the Panel's view, has dealt appropriately with the issues raised in the Request and demonstrated clearly that it has followed or is taking steps to follow the required policies and procedures, or Management has acknowledged that it did not comply with relevant policies and procedures, and
- whether Management has provided a statement of specific remedial actions, and whether, in the judgment of the Panel and taking into account the view of the Requesters, these proposed remedial actions may adequately address the matters raised by the Request.

50. In this section, the Panel provides its preliminary observations on the alleged and potential harm and compliance. In doing so, the Panel is not making any definitive assessment of the Bank's compliance with the relevant policy or any adverse, material effect it may have caused.⁷¹

51. The Panel's observations on the allegations and concerns raised are structured in accordance with the five categories of harm based on which the Request is summarized in Section C. Preceding these observations, this section commences with a brief description of the current situation of the Batwa people in Uganda.

52. **Situation of the Batwa people in Uganda.** According to the VMGF, the Batwa communities living near the four PAs in southwestern Uganda have been identified as IP/sub-Saharan African historically underserved, traditional, local communities.⁷² Historically, the Batwa people have lived in small groups as hunter-gatherers in the forests of southwest Uganda and neighboring countries. In the 1930s and 1940s, the forest regions where the Batwa of Uganda had traditionally resided – including the Mgahinga, the Bwindi, the Semuliki and the Echuya forests – were gazetted as PAs. From the 1960s onwards, they were forced out of these areas based on legislation prohibiting human residence inside protected forests.⁷³ According to the Batwa with whom the Panel met, the last communities were forcefully evicted in the early 1990s, and as a result, they lost their homes and livelihoods without receiving compensation, land, or support for establishing alternative livelihoods.

53. According to Project documents, today, most Batwa live in small groups close to the four PAs which are part of the Bank-funded Project. Having lost their traditional way-of-life, the Batwa face widespread discrimination, experience severe poverty, and remain one of Uganda's most marginalized and vulnerable groups. They struggle socially and economically

⁷⁰ Inspection Panel Operating Procedures, 2025, pp. 15-16, para. 45.

⁷¹ Inspection Panel Operating Procedures, 2025, p. 16, para. 46.

⁷² VMGF, March 10, 2020, pp. 5-6.

⁷³ Paterson, Alexander, 2022, *Protected areas, community rights and affirmative action: The plight of Uganda's Batwa people*. African Human Rights Law Journal Vol. 22.

and lack political representation in decision-making structures at all levels. Because the Batwa lack such representation they are more disadvantaged and vulnerable and often rely on others to speak on their behalf. Structural disadvantages include limited access to basic public goods and services, including education and health care, reflected in extremely low levels of educational attainment, life expectancy and employment.

54. In 2013, the Batwa petitioned Uganda’s Constitutional Court over their forced eviction from their ancestral lands without compensation, suing the Government for failing to recognize their ancestral ties to the forests and for forcibly evicting them from their lands without protecting their rights and culture. In August 2021, the Court ruled in their favor, affirming their historical ties to the forests from which they were evicted and that they had not received compensation. It ordered affirmative action but did not decide the form of restitution. The case was referred to the High Court of Uganda. In the meantime, the Attorney General filed an appeal with the Supreme Court against the findings of the Constitutional Court, in respect of which a decision remains pending.

55. Perpetuation of historic injustices against the Batwa people and exclusion from participation in co-management arrangements and benefit-sharing. The Batwa communities with whom the Panel met during its visit shared that their ongoing cultural, social, and economic hardships originate from their eviction in the early 1990s from forests to which they make ancestral claims. They also said they received no compensation or alternative livelihood support from the Government when that happened. They explained that until then, they depended on forest resources for their subsistence, especially food and medicinal plants. They said that since then, they have been living like “squatters” on land owned by the dominant *Bakiga*⁷⁴ tribe or others. According to the communities, their eviction has affected their traditional livelihoods of hunting and gathering, leaving them vulnerable and disadvantaged in relation to the settled communities who own land. The Batwa communities told the Panel they believed the Project could have done more to address their ongoing marginalization and exclusion. They believe the Project reinforces existing injustices against the Batwa, perpetuating their exclusion and marginalization.

56. Regularized community access to PAs, including non-Batwa and Batwa. The Panel notes the community members with whom it met in Bwindi and Mgahinga stated that since their eviction, they have not been able to access the forests to which they lay ancestral claim, unless they take great risks. They explained that sustaining their livelihoods has become extremely challenging. According to the Requesters, while access restrictions have not changed under the Project, the Project perpetuates and reinforces these restrictions. They also expressed frustration that they are only allowed into the forests when requested by UWA officials or tour operators to perform Batwa cultural practices for tourists.

57. The Batwa communities with whom the Panel met claimed the stone wall built around Mgahinga as part of the Project further separates them from “their” forest. Government authorities confirmed that there was an existing wall which was upgraded and completed with Project funding. They explained that this so-called “Buffalo” wall was built to keep wildlife inside the forest, not to keep people out of the forest, as wildlife had been damaging crops and local communities’ livelihoods. Authorities added that access points were built into the wall and that some Batwa workers had been hired for its construction.

⁷⁴ The Bakiga are a distinct ethnic group, known for their resilience, culture, and deep connection to the highlands of Kigezi in southwestern Uganda, including a strong agricultural tradition.

58. Some community members said they entered the PAs to gather firewood or medicinal herbs to meet their subsistence needs, despite the risk of arrest. They also mentioned that people who had not entered the PAs had been falsely accused by UWA of having done so. They said anyone who attempts to enter the PAs risks being shot; one community member recalled people were killed in 2009 and in 2012. They added that UWA rangers visit their communities warning them to stay out. However, the Requesters told the Panel these specific incidents of violence predated the Project. Some community members expressed concern that the Project strengthens UWA's authority and the means at its disposal to control access to the PAs, determine who benefits from tourism, and select who can use resources gathered in the parks. The Batwa communities with whom the Panel met also voiced fears that boundary changes and additional restrictions may lead to their possible forced relocation farther from their ancestral lands.

59. The Panel notes the Requesters allege that, because consultations were not properly conducted, they have “*never [been] allowed to come to the table to negotiate co-management arrangements or benefit-sharing that could provide sustainable livelihoods for [their] communities.*” The Panel observes that none of the Batwa communities members with whom the Panel Team met – and who reside near Bwindi and Mgahinga – mentioned CRM agreements as a means for being granted regularized access to these two forests areas to which they lay ancestral claim, nor did they indicate that they had successfully participated or attempted to participate in such arrangements. During its meetings with Batwa communities near Bwindi and Mgahinga, the only person who mentioned agreements to regularize forest access was a leader of a Batwa-led organization who explained these agreements in the context of Echuya. The Panel understands existing CFM agreements at Echuya were negotiated with NFA, and new agreements are negotiated with MWE.

60. Government authorities told the Panel that CRM and CFM agreements provide the basis for those living around PAs, including the Batwa, to access these areas in a regularized manner. These agreements serve members of all communities who live within a certain distance of PAs to gain access for the purpose of collecting certain types of natural resources for personal or community needs. The Government authorities emphasized that CRM and CFM agreements are designed to support community livelihoods while prohibiting commercial use of forest and park resources. They explained that these agreements differ from the modalities that apply to the tourism sector – which is regulated by the Ministry of Tourism, Wildlife and Antiquities, and production forestry – which is regulated by MWE. They reiterated that UWA is responsible for granting regularized access to NPs based on CRM agreements, and MWE – which now includes the former NFA – grants regularized access to CFRs based on CFM agreements. The Panel notes the VMGF stipulating that CRM and CFM agreements are the entry points for communities participating in the management of PAs and that the protection of the Batwa's rights to access forest natural resources and receive livelihoods support – as Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Communities – will be their main benefit from the Project received through CRM and CFM agreements.

61. The Government authorities with whom the Panel met said CRM and CFM agreements are negotiated between the relevant Government authorities and the beneficiary community groups and captured in the form of Memoranda of Understandings (MOUs). The MOUs stipulate the roles and responsibilities of the parties in relation to accessing and using resources from within the PAs, typically including the collection of firewood, water, fruit and vegetables (e.g. mushrooms), medicinal plants, and other plant materials. The Government authorities emphasized that regularized access does not allow bushmeat hunting.

62. According to both the Government authorities and Management, participation in CRM and CFM agreements is open to all members of communities residing in parishes around the gazetted PAs. They also mentioned that the process for obtaining regularized access to the PAs and its resources involves the relevant district authorities throughout the entire process.

63. Management explained that regularized access modalities are established under national laws and regulations and predate the Project. It added that the Project has built on these modalities and, therefore, promotes a system based on collaboration rather than punitive measures. Management also noted that the Project is supporting the renewal of such agreements and that each beneficiary community group (i.e., Resource Use and Forest Use Group) comprises between 200 and 250 individuals and that these groups include some Batwa individuals. Management said that in the case of CRMs, beneficiary community groups are more loosely defined, while CFM beneficiary community groups are initially loosely defined, but then become formally registered and benefit from Project inputs aimed at strengthening their capacity and leadership for the purpose of collaborative forest management.

64. The Panel observes that the Management Response provides data on the number of Batwa individuals participating in CRM and CFM community groups and who, therefore, have regularized access to the PAs. The Panel notes that, according to the Management Response, no Batwa individuals are involved in the renewed or new CRM agreements providing regularized access to the Bwindi Impenetrable NP, and only eight Batwa individuals are party to community groups benefiting from CRMs providing regular access to Mgahinga. The Response also shows that 126 Batwa individuals are members of a beneficiary community group that is party to a CRM agreement for regularized access to Semuliki. The Response records that there are 101 Batwa individuals among the 1,118 community members who can access Echuya based on four CFM agreements for that CFR.⁷⁵ The Panel observes that, currently, in total, this information adds up to 244 Batwa individuals having access to the four PAs based on the regularized access modalities, or about six percent of the Batwa population residing adjacent to these four PAs.⁷⁶ The Panel notes the higher Batwa participation numbers for Echuya and Semuliki, compared to Bwindi and Mgahinga where the Requesters are and where there is, respectively, no and minimal Batwa participation in CRMs.

65. The Panel notes the Batwa are known to be subjected to structural discrimination and marginalization. In its meeting with the Panel, Management acknowledged the difficult situation of the Batwa communities, noting their marginalization and extreme poverty. Management explained that the Project recognized and assessed the Batwa's challenging historical and socioeconomic situation as reflected in the VMGF. The VMGF provides the basis for the design and implementation of four site-specific VMGPs, which have been in place since late 2023. According to Management, these plans were prepared to meet the Bank requirements stipulated in ESS7. Management emphasized that the Project neither replicates nor furthers the injustices against the Batwa people. The Panel was told the Project successfully supports Batwa community livelihoods and their regularized access to natural resources in the PAs next to which they reside based on CRM and CFM agreements and the VMGPs. In addition, the Response notes there is no indication that the Project has aggravated the adverse impacts cited by the Requesters stemming from the displacement of the Batwa people between the 1960s and the early 1990s.⁷⁷

⁷⁵ Management Response, pp. 34-36.

⁷⁶ Panel's calculation based on figure included in Management Response, pp. 34-36.

⁷⁷ Management Response, p. 15, para. 46.

66. The Panel observes that baseline information in the VMGF identifies CRM and CFM agreements as mechanisms for Batwa communities to access forest resources in the PAs. It notes that all four original VMGPs listed output targets for the inclusion of more Batwa individuals in CRM and CFM community groups. As per the baseline information provided in the VMGF, the Batwa living around Echuya were already integrated and represented in CFM community groups and have been granted preferential access through affirmative actions.⁷⁸

67. *Providing benefits to Batwa communities.* Community members told the Panel that some of them had attended two-day workshops, organized by UWA, providing skills training on carving wooden animals, basket-weaving, and making shoe polish, as per the VMGPs. They said they were informed of these workshops at short notice and that limited spaces were available for participation. They added that attendees appreciated these workshops, but they considered two days insufficient to master these skills. They also highlighted that the raw materials were costly, and that they lacked the necessary tools to further develop these skills. Additionally, they claimed the training did not reflect the skills they had communicated they wished to learn during consultations.

68. The Panel observes that the Management Response states “*the Project has systematically included Batwa communities [...] by making Project benefits accessible to them, in line with ESS7.*”⁷⁹ The Panel also notes the Response states “*the Project has successfully supported Batwa community livelihoods and their regularized access to natural resources in PAs.*”⁸⁰ The Panel notes that Management’s Response explains the Project developed the VMGF and VMGPs in consultation with the Batwa communities and their representatives, and that it has implemented the VMGPs to deliver targeted livelihood support activities for the benefit of Batwa communities. The Response also states that, rather than having caused adverse impacts, Project activities have helped improve the livelihoods of the Batwa communities adjacent to the four PAs.⁸¹

69. The Panel further observes that the Management Response states “[t]he Batwa communities continue *not only* to enjoy regularized access to forest resources under existing regulations and new MoUs supported by the Project *but also benefit specifically from targeted livelihood support activities provided by the Project as well as other activities* [emphasis added].” Thus, the Panel observes the Management Response refers separately to Batwa communities enjoying (i) regularized access to forest resources and (ii) targeted livelihood activities.⁸² The Panel notes the Response does not reflect the conceptual link which the VMGF clearly draws between the VMGPs and the Batwa’s right to access forest natural resources. The Panel notes that the Management Response states the Batwa’s lack of access to the forest to which they lay ancestral claim represents a “*historical injustice*” to which the Project has no link.

70. The Government authorities with whom the Panel met, explained that the Batwa benefited from the Project in several ways. They mentioned regular access through collaborative CRM/CFM agreements which allow PA-adjacent communities (non-Batwa and Batwa) to collect different kinds of permissible resources on specific days of the week for personal and community consumption. They also mentioned the targeted livelihood activities

⁷⁸ VMGF 2020, Chapter 2.

⁷⁹ Management Response, p. 17, para. 47.

⁸⁰ Management Response, p. 14, para. 41.

⁸¹ Management Response, p. 17, para. 55.

⁸² Management Response, p. 17, paras. 50 and 51 and p. 19, para. 61.

provided to the Batwa through the VMGPs – like training in beekeeping and other skills, fuel-efficient cookstoves, and the inventory of medicinal plants. Third, they stated that Batwa individuals may earn cash income for work rendered to Government authorities, such as cutting grass, controlling invasive neophytes, or building the “Buffalo” stone wall around Mgahinga to reduce human-wildlife conflicts, for which Batwa workers would receive “*the same or similar wages*” as non-Batwa workers.

71. *Sharing revenues generated from tourism.* The Requesters told the Panel they understand the Batwa are entitled to a share of tourism revenues. They said barriers such as lack of formal recognition, representation, and access to bank accounts prevent Batwa from benefiting from these funds. The Batwa further argued that, while the Project is strengthening UWA’s infrastructure, the Batwa are not receiving revenues through the Government’s tourism revenue-sharing schemes. The Batwa communities with whom the Panel spoke said they expected to get direct access to the bank accounts in which the revenues earmarked for them are being held and that UWA rejected this. They also stated that district authorities are not providing them with the basic goods and services they need, including access to health care and education. The Panel notes that the Management Response states that the Project does not support or rely on UWA’s tourism revenue sharing schemes and views it as incorrect that possible exclusionary features of these schemes, if any, are attributable to the Project.

72. The Panel notes that, other than supporting tourism through some targeted investments delivered under Component 2, the Project does not directly support the local government-level tourism revenue-sharing schemes in place in Uganda. During its meeting with the PIUs, the authorities explained that 20 percent of annual park revenues are shared as conditional grants with local government authorities. In addition, UWA also shares US\$10 for each gorilla-tracking permit for the benefit of park-adjacent communities. The authorities explained that 50 percent of the fee that tourists are charged for the Batwa Trail experience offered in Mgahinga are earmarked for the Batwa. They said the Batwa benefit from these earmarked shares either in the form of wages for tourism services render (guides, performers), or local authorities covering expenditures for public services rendered to Batwa communities.

73. **Alleged exclusion from meaningful participation in the Project.** The Requesters told the Panel they felt excluded from Project decision-making and opportunities to participate in forest management, community conservation efforts, and increased revenues and jobs. According to them, the Batwa were not considered by the Project despite being original guardians of the forest and the Project failed to improve their situation.

74. Representatives of Batwa-led organizations with whom the Panel met, including the Requesters, said initial consultations had taken place early in Project preparation. The Representatives claimed later engagements lacked transparency, clarity of purpose, and inclusiveness stating they were poorly managed, with unclear objectives, no transparency on timelines, and no acknowledgment of Batwa concerns. The Requesters and community members explained they were not even aware these initial consultations were part of community engagement relating to a World Bank Project.

75. Batwa community members told the Panel they answered many questions about Batwa needs and priorities during the initial consultations. However, none of the discussed benefits – such as skill training, seedlings and crops, equipment, housing, job opportunities, or lodges – materialized and there were no follow-up discussions. They claimed they had not been consulted on the activities and benefits included in the VMGPs that had been developed and

are being implemented, which they believe do not reflect their needs or what they communicated in the initial consultations. The Batwa representatives in the communities the Panel visited added that Batwa concerns and needs were not reflected during the validation of the original VMGPs. The Requesters told the Panel they asked for meeting minutes and schedules, which they say were never shared.

76. Batwa community members described the meetings as general consultations rather than Batwa-specific ones. They told the Panel they were unaware how their inputs in the consultations were used by the Project. The communities with whom the Panel spoke claimed that during these discussions they lacked information regarding Project details. During its visit, the Panel learned from the Requesters that, following their complaint to the Bank, Bank staff acknowledged that consultations had been insufficient and decided to repeat them.

77. Management and the Government authorities told the Panel Team that the Project had consulted more broadly with a wider range of Project stakeholders – from Batwa-led and non-Batwa-led CSOs/NGOs – during Project preparation and on the needs and requirements of the Batwa communities to support development of the VMGF and subsequent VMGPs. Management and Government authorities acknowledged that the initial VMGPs have been, in general, weak and that, following the concerns raised by three Batwa-led organizations, the Project made efforts to consult again to improve the initial VMGPs following a new stakeholder mapping exercise. According to the Response, from 2020 to 2025, four rounds of consultations were held, including with 28 nongovernmental organizations – (NGOs)/CSOs (both Batwa- and non-Batwa-led) – which directly involved about 10 percent of the total Batwa population in Uganda.

78. The Panel notes that in the Management Response the Bank acknowledged that the SEP has recently been updated and lessons learned from Project implementation have been incorporated. The authorities and the Bank informed the Panel that, following the complaint, they have significantly increased their engagement with the Batwa communities with the objective of updating and improving the VMGPs. The Panel received the updated four site-specific VMGPs on January 5, 2026.

79. **Alleged “unauthorized representation” during consultations.** The Panel Team heard from the communities that the Batwa people have no formal leader; instead, each Batwa community has a committee which deliberates and discusses its issues and concerns. Community members told the Panel they felt treated as “*obstacles*” rather than partners who can contribute to the Project.

80. In all communities the Panel visited Batwa emphasized their distrust of non-Batwa-led organizations and expressed support for Batwa-led organizations. The Requesters told the Panel Team that the Project consulted NGOs, CSOs, and church-based organizations who did not represent Batwa interests, with some even opposing Batwa priorities. They added that some were not from Uganda and other organizations involved in the consultations exploit the Batwa and their culture. Requesters and the community members with whom the Panel met in Bwindi and Mgahinga told the Panel they feel these non-Batwa-led organizations cannot speak on behalf of Batwa or opine Batwa priorities.

81. According to the Requesters, the involvement of non-Batwa-led organizations, who communities believe do not have their interests at heart, led to deferring views, internal conflict, and increased pressure among the participants. The Panel notes Management’s interpretation

that Requesters may be conflating Project-related consultations with formal political representation.

82. Management and Government authorities with whom the Panel met mentioned that consultation arrangements with the Batwa for the Project have been challenging because there is no “*one voice*” speaking for the Batwa. In its initial meeting with the Panel Team, Management emphasized that the Project has faced the challenge of a diffuse or “*broken landscape*” of Batwa representation. Despite their limited number of some 4,000 persons, they are split into multiple small groups of families, Batwa-led, and non-Batwa-led organizations who claim to represent and support them. Management explained that while the Batwa residing around Semiliki pledge loyalty to a king, those Batwa groups residing around the three PAs in the southern part of the country do not recognize this authority. According to the Response, these groups speak with many different voices and several representatives who claim to speak on their behalf. Management explained that, faced with this situation, its approach to community engagement for the VMGF and the initial four VMGPs, as well as the updates to these VMGPs, has been to listen to everyone. The Panel observes that the VMGF is clear on consulting specifically with Batwa communities and for engagement with Batwa requiring “*additional and focused attention*” according to a set of principles.

83. **Alleged disregard for Batwa traditional forest knowledge and cultural practice while exploiting Batwa culture.** Batwa community members with whom the Panel met in Bwindi and Mgahinga expressed that because of their traditional knowledge of the forests, they expected employment opportunities with UWA and tourism companies, as well as greater involvement in community conservation and management efforts. They told the Panel that only UWA staff, tourists, and tourism operators currently have access to the PAs. They told the Panel that while they expected more opportunities for Batwa to be hired by UWA as porters, guides, or rangers, most attempts by Batwa to secure jobs with UWA or tourism companies have failed, with only a few occasionally hired as back-up porters.

84. The Requesters also told the Panel that Batwa culture and identity are being commodified for cultural tourism without their consent. The Batwa communities expressed their concern to the Panel that they are treated as a cultural attraction, and they are asked to showcase their culture for tourists without meaningful benefits given to their communities in return.

85. According to the Batwa communities, among the organizations the Project engaged with for consultations are some that exploit the Batwa and their culture. They told the Panel that individuals in their communities are regularly called upon by UWA or tourism companies to perform cultural dances for tourists, for which they claim they receive only tips which are often paltry and given at tourists’ discretion. They said these practices contribute to their marginalization and exploitation, as Batwa culture is displayed but not valued, without fair payment, and no benefits are provided to their communities.

86. The Batwa communities also told the Panel of their concerns that while UWA will increase its infrastructure and tourism revenues, the Batwa will continue to be exploited for cultural performances without proper recognition, participation, or pay. The communities said payments for performances are controlled by UWA and they only get occasional tips.

87. The Management Response states it is incorrect to claim the Project has disregarded the Batwa’s traditional forest knowledge. As an example, the Bank and the Government authorities emphasized that the Project had funded the inventory of medicinal plants and is

planning to fund a demonstration plot for medicinal plants as agreed with the Batwa communities. The Response also states the Project does not support the use of Batwa cultural heritage for commercial purposes by non-Batwa and that the Project does not support interventions that commercially develop Batwa knowledge or culture for the benefit of non-Batwa. Nevertheless, Management acknowledges that few Batwa hold tourism or conservation jobs.

88. **Community safety and intimidation.** During the visit, the Requesters told the Panel that their attempts to assert their rights during consultations and engagement with Project and Bank staff resulted in intimidation by district authorities and attempts to silence their voices. The Requesters informed the Panel that they withdrew from the Project's process in July 2025 due to safety concerns and continued violations of their rights.

89. The Government authorities with whom the Panel Team met mentioned that some Batwa representatives were misconstruing the Project's objectives and engagement process to address issues that lie outside the Project's scope. They also mentioned that some CSO/NGOs had written to the Batwa, raising false allegations without stating the relevant facts.

E.3 The Panel's Review

90. In this section, the Panel establishes:

- i) whether there is a plausible causal link between harm and the Project;
- ii) whether the harm may be significant and the potential noncompliance of serious character, and
- iii) whether Management dealt appropriately with the issues raised in the Request and demonstrated clearly that it has followed or is taking steps to follow the required policies and procedures or,
- iv) whether Management has provided a statement of specific remedial actions, and whether, in the judgment of the Panel and taking into account the view of the Requesters, these proposed remedial actions may adequately address the matters raised by the Request.

91. The Panel appreciates the extensive discussions it had with the Government authorities in Uganda and recognizes the importance of this Project. The Panel acknowledges the serious concerns of the Requesters and the community members with whom it spoke and the trust they have placed in the Panel's process. It appreciates the productive discussions it held with them and the additional information it received during its visit. The Panel also acknowledges Management's detailed response to the issues raised in the Request and that it shared with the Panel, on January 5, 2026, the four updated, site-specific VMGPs.

92. In the following paragraphs, the Panel provides its review of the issues raised in the Request in two parts: first, the allegations related to the perpetuation of the Batwa's marginalization and exclusion and second, the allegations related to participation, representation and community safety.

93. **Perpetuation of historic injustices against the Batwa people and exclusion from participation in co-management arrangements and benefit-sharing, including sharing revenues generated from tourism and disregarding Batwa traditional forest knowledge and cultural practice, while exploiting Batwa culture.** The Panel agrees with Management that the claims relating to compensation, land, and restitution for historical injustices – i.e.,

compensation for evictions – are beyond the purview of the Project and by extension the Panel’s mandate. Hence, the Panel process does not cover these claims.

94. From the VMGF, the Panel understands that the Project – through the VMGPs and in fulfilment of the Project’s ESS7 requirements – is expected to “*increase the protection of the VMG’s rights to access the forest natural resources and receive livelihoods support through CFM and CRM agreements*” and that the Batwa “*will also be able to benefit from job opportunities.*”⁸³ Furthermore, the VMGF states that it “*identifies measures to ensure avoidance of any adverse impacts upon local livelihoods and supports the development of alternative livelihoods where and as needed.*”⁸⁴

95. The Panel notes that the Management Response links the Requesters’ concern about not being allowed “*to come to the table to negotiate co-management and benefit-sharing*” to tourism-related revenue-sharing schemes. The Panel disagrees with this interpretation: it understands this concern relates to the Batwa’s ancestral claim to access forest natural resources, which the VMGF intended to address by providing the Batwa with regularized access through CRM and CFM agreements and the development of alternative livelihoods and which the four site-specific VMGPs are expected to deliver in view of the Project’s ESS7 requirements.

96. *Regularized community access for the Batwa to the PAs:* The Panel observes that there is a plausible link between the Requesters’ allegation respective the Project perpetuating the marginalization of the Batwa in relation to their ancestral claim to access natural resources in the forests from which they were evicted. The Panel notes that ESS7 recognizes the collective attachment of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Communities, such as the Batwa, to land traditionally or customarily used or occupied. The Panel notes that the VMGF recognizes this attachment as the communal rights of the Batwa living on the fringes of the four PAs to which the Request relates, and it states these rights as the basis for developing and implementing site-specific VMGPs.

97. In addition, based on the information the Panel has heard and seen at this stage of the Panel process, it is unclear whether the Project’s support – conceptually and practically – to the renewal and negotiation of CRM and CFM agreements is restricting the Batwa’s ancestral claims to these forests as recognized Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Communities. The Panel notes that participating in the negotiation of CRM or CFM agreements requires that Batwa individuals engage with individuals from other, more dominant social groups as well as with district authorities. With this *modus operandi* posing challenges for the Batwa, it is unclear to the Panel how the Bank has ensured the effective involvement of Batwa communities in CRM and CFM agreements, and whether - especially in Bwindi and Mgahinga – the Batwa were sufficiently informed and capacitated to participate in the renewal of existing and the formation of new CRM groups and the negotiation of CRM agreements.

98. The Panel acknowledges receiving the revised VMGPs on January 5, 2026. It notes these plans contain updated information, including on the Project restructuring, expanded baseline information on the Batwa and their socio-economic situation in the areas where they live, as well as the CRM/CFM processes and access arrangements applied to the four PAs. The plans also provide updates on VMGP implementation (as of July 2025), the consultation

⁸³ VMGF 2020, Chapter 4, p. 35.

⁸⁴ VMGF 2020, Chapter 5, p. 35.

process before and for the updated VMGPs, and the proposed output targets. The Panel notes that these targets cover the inclusion of more Batwa individuals in CRM and CFM groups and additional benefits. At the same time, the Panel observes that the more favorable numbers indicated in the updated VMGPs (dated December 2025) regarding Batwa individuals already participating in CRMs and CFMs groups vary considerably from those provided in the Management Response (dated November 2025). The reasons for these variations are unclear to the Panel.

99. *Providing additional benefits to Batwa communities:* The Panel acknowledges that, beyond the objective of involving Batwa in CRM and CFM agreements, the Project has sought to deliver targeted livelihoods activities and other benefits to the Batwa communities, such as training workshops, occasional jobs, water tanks, and an inventory of traditional medicinal plants. The Panel notes that the Batwa communities it met with did not view these benefits as supporting their livelihoods, and it is unclear to the Panel how these benefits relate to their “rights to access the forest natural resources.”

100. *Sharing revenues generated from tourism and exploitation of Batwa culture:* The Panel understands that revenue-sharing schemes are managed by local district authorities and were neither established nor supported by the Project. Therefore, the Panel considers the allegation that the Batwa were excluded from tourism-related revenues as not directly linked to the Project. However, the Panel notes that the Project supports tourism expansion through Component 2, which aims to boost revenues and create jobs via targeted investments in this sector. While tourism activities may generate positive impacts for different stakeholders, including Batwa individuals, they may also plausibly influence outcomes that could be linked to the alleged exploitation of Batwa culture.

101. **Alleged exclusion from meaningful participation in the Project, alleged “unauthorized representation” during consultations, and alleged reprisals and intimidation.** The Panel observes that all three allegations are linked to the question of whether the Batwa and/or Batwa representatives were sufficiently informed and capacitated to participate in the renewal of existing and the formation of new CRM groups and the negotiation of CRM agreements and alternative livelihoods activities. The Requesters told the Panel that the consultations did not provide the Batwa with a safe space, free of discrimination, which allowed them to engage and participate continuously. The Panel notes, as has the Bank, that the Batwa’s vulnerability and marginalization pose challenges to designing and implementing mechanisms that ensure their meaningful participation in the Project.

102. The Panel observes that there is a plausible causal link between the alleged harm and the Project. The Panel considers that the harm may be significant and that there are potential noncompliance of serious character, with the Bank’s Environmental and Social Policy for Investment Project Financing and related standards (especially Environmental and Social Standards 7 and 10) and with the Directive on Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups. The Panel further observes that, in its view, it is unclear whether Management has dealt appropriately with the issues related to perpetuating the Batwa’s vulnerability and marginalization, as covered in this section. Finally, the Panel observes that Management has not provided a statement of specific remedial actions, that may adequately address these issues.

F. Recommendation

103. The Panel notes that the Requesters and the Request for Inspection meet the technical eligibility criteria set forth in the Panel Resolution. As detailed above, the Panel considers some of the alleged harm to be plausibly linked to the Project. Such harm may potentially constitute serious policy non-compliance.

104. Based on the above Panel observations and review, the Panel recommends investigating the Bank's compliance with the Bank's Environmental and Social Policy for Investment Project Financing and related standards (especially Environmental and Social Standards 7 and 10), the Bank Directive on Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups, and the Investment Project Financing.

105. If the Board of Executive Directors concurs with the Panel's recommendation, as per paragraph 30 of the Panel Resolution, the Head of the Dispute Resolution Service shall offer an opportunity for dispute resolution that has a scope which "*is limited to project-related issues raised in the Request for Inspection and identified as the issues to be investigated in the Inspection Panel's report to the Executive Directors recommending investigation.*"⁸⁵ The Panel will commence its investigation if there is no dispute resolution.

⁸⁵ Paras 30 and 72 of 2025 Resolution.

**Request for Inspection
(Redacted)**

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. Fax: +1(202)-522-0916. Email: ipanel@worldbank.org

(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.

The IFPA-CD project is replicating and furthering historical injustices against the Batwa people. We were forcibly evicted from our ancestral forests in 1991 without compensation and have no land of our own. This project represents a critical opportunity for co-management and benefit-sharing that could address decades of marginalization - yet we are being systematically excluded from meaningful participation.

The project causes direct harm by:

1 Perpetuating landlessness and exclusion: Without proper consultation, we are never allowed to come to the table to negotiate co-management arrangements or benefit-sharing that could provide sustainable livelihoods for our communities.

2 Destroying community unity: The Bank's acceptance of unauthorized representation and failure to follow ESS7 is creating damaging divisions between Batwa leaders and settlements, weakening our collective voice when unity is essential for our survival.

3 Wasting Indigenous knowledge: Our traditional forest knowledge and cultural practices could greatly benefit both conservation outcomes and tourism development, but the project ignores this invaluable resource by treating us as obstacles rather than partners.

4 Legitimizing continued marginalization: By conducting 'consultations' without proper Indigenous representation, the project provides legal cover for ongoing exclusion from our traditional territories and resources.

5 Threatening community safety: Our attempts to assert our rights have resulted in intimidation and safety concerns for our representatives.

This project could transform Batwa livelihoods through genuine partnership, but instead it is entrenching our exclusion and replicating the same patterns that dispossessed us. Without immediate intervention, it will further cement our marginalization for generations.

6. Cultural exploitation and forced assimilation: The project funds tourism initiatives that exploit Batwa culture while excluding us from revenue-sharing. They position select Batwa individuals to perform our cultural practices for tourists while Uganda Wildlife Authority and non-Indigenous (Bakyiga) people collect the tourism revenue. This represents systematic cultural assimilation: they don't want us practicing our culture for our identity and heritage, but rather as a commodified resource for government tourism income. Our sacred cultural practices become performance for others' profit while we remain impoverished.

7. Deepening economic marginalization: While our culture generates tourism revenue in our traditional territories, we receive no meaningful share of these benefits. The project structures

ensure that conservation and tourism profits flow to government agencies and non-Indigenous intermediaries, further entrenching our economic exclusion from lands that once sustained us and which we protected.

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

Uganda Investing in Forests and Protected Areas for Climate-Smart Development (IFPA-CD) Project (P170466)

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

Uganda - affecting Batwa communities around Bwindi Impenetrable National Park, Mgahinga Gorilla National Park, Echuya Central Forest Reserve, and Semuliki National Park

4. Do you live in the project area?

Yes, our communities live in areas directly affected by the project activities around these protected areas.

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.

Yes. We submitted formal petitions in October 2024 and have been in ongoing communication throughout 2024-2025. World Bank staff [REDACTED] and [REDACTED] have been responsive to our concerns and attempted to facilitate dialogue. However, the fundamental problems persist: (1) Government implementing agencies (Ministry of Water and Environment, Uganda Wildlife Authority, National Forest Authority) continue to ignore ESS7 requirements; (2) Unauthorized individuals, including non-Indigenous people like [REDACTED], interfere in Indigenous consultation processes; (3) The consultation framework itself treats Indigenous peoples as general 'civil society' rather than applying ESS7 standards. Despite the good faith efforts of some World Bank staff, the project structure allows government agencies to violate Indigenous rights while using unauthorized representatives to claim 'Batwa consultation' has occurred. We were ultimately forced to withdraw from the process in July 2025 due to serious safety concerns and continued violations, but the project continues to operate without proper Indigenous consultation.

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

Environmental and Social Standard 7 (ESS7) on Indigenous Peoples - specifically requirements for Free, Prior and Informed Consent (FPIC) and meaningful consultation with Indigenous communities.

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

Yes. Our representatives have already experienced concerning incidents including potential intimidation tactics on roads after meetings. We documented safety concerns in our formal withdrawal letter.

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)

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
Name	[REDACTED]	[REDACTED]
Address	[REDACTED]	[REDACTED]
Phone	[REDACTED]	[REDACTED]
	[REDACTED]	[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
[REDACTED]	[REDACTED]

Signatures (more signatures can be sent as an attachment):

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.*

Management Response

**MANAGEMENT RESPONSE TO
REQUEST FOR INSPECTION PANEL REVIEW OF THE
UGANDA: INVESTING IN FORESTS AND PROTECTED AREAS FOR
CLIMATE-SMART DEVELOPMENT PROJECT (P170466)**

Management has reviewed the Request for Inspection of the Uganda: Investing in Forests and Protected Areas for Climate-Smart Development Project (P170466), received by the Inspection Panel on August 29, 2025 and registered on October 14, 2025 (RQ25/05). Management has prepared the following response.

11/28/2025

CONTENTS

Abbreviations and Acronyms	iii
Executive Summary	iv
I. Introduction.....	1
II. The Request	1
III. Project Background	1
IV. Additional Background	7
V. Management’s Response	13

Map

Map 1. IBRD No. 49195

Annex

Annex 1. Claims and Responses

ABBREVIATIONS AND ACRONYMS

BIDO	Batwa Indigenous Development Organization
BIEO	Batwa Indigenous Empowerment Organization
BDO	Batwa Development Organization
CBO	Community-Based Organization
CFM	Collaborative Forest Management
CFR	Central Forest Reserve
COVID	Novel Coronavirus
CRM	Collaborative Resource Management
CSO	Civil Society Organization
ESCP	Environmental and Social Commitment Plan
ESMF	Environmental and Social Management Framework
ESS	Environmental and Social Standard
FPIC	Free, Prior, and Informed Consent
GBV	Gender-Based Violence
GM	Grievance Mechanism
GMP	General Management Plan
GRS	Grievance Redress Service
ICC	Incident Cause Committee (of the World Bank)
IDA	International Development Association
IFPA-CD	Investing in Forests and Protected Areas for Climate-Smart Development (Project)
IP/SSAHUTLC	Indigenous Peoples / Sub-Saharan African Historically Underserved Traditional Local Communities
MoU	Memorandum of Understanding
MWE	Ministry of Water and Environment
NFA	National Forestry Authority
NGO	Nongovernmental Organization
PA	Protected Area
RCA	Root Cause Analysis
REGROW	Resilient Natural Resource Management for Tourism and Growth (Project)
SEF	Stakeholder Engagement Framework
SEP	Stakeholder Engagement Plan
SOP	Standard Operating Procedure
UPDF	Uganda People's Defence Forces
USAID	United States Agency for International Development
UWA	Uganda Wildlife Authority
VMGF	Vulnerable and Marginalized Groups Framework
VMGP	Vulnerable and Marginalized Groups Plan

EXECUTIVE SUMMARY

Project

i. The Project was approved on April 23, 2020, and provides US\$148.2 million (equivalent) through an International Development Association (IDA) credit (US\$78.2 million equivalent) and a grant from the IDA18 Refugee Sub-Window (US\$70 million equivalent). It became effective on August 18, 2021; COVID pandemic restrictions delayed implementation.

ii. The Ministry of Water and Environment (MWE) is the coordinating ministry and is responsible for implementation of activities in and around Central Forest Reserves (CFR) (previously implemented by the National Forestry Authority (NFA), which was dissolved in August 2025); activities in refugee-hosting areas; and production forestry¹ activities. The Uganda Wildlife Authority (UWA) is responsible for implementation of Project activities in and around wildlife protected areas (PAs), including national parks and wildlife reserves. The Project's closing date is June 30, 2026.

iii. ***The Project Objective is to improve sustainable management of forests and PAs² in target landscapes; and to increase benefits to communities from forests in target landscapes.***³ The Project has four components. They aim to:

- Improve co-management and restoration of government-managed forest and PAs, including reducing human-wildlife conflict; promoting community conservation; and supporting sustainable livelihoods investments for the park-adjacent communities.
- Increase revenues and jobs from forest and wildlife PAs through targeted investments in tourism and production forestry.
- Encourage establishment of increased tree cover in refugee-hosting landscapes on host community land outside PAs and support sustainable forest management and landscape resilience on private and customary land.
- Support Project coordination and monitoring.

¹ Production forestry is a branch of forestry that focuses on the sustainable cultivation, management, and harvesting of forests for the purpose of producing wood and other forest products.

² Protected Areas, as defined in the Project legal agreement, include the national parks, wildlife reserves, and central forest reserves listed in the agreement.

³ Target Landscapes are defined by the legal agreement as districts within the Albertine Rift and Refugee Hosting Areas (as enumerated in the agreement).

Request for Inspection

iv. The Request for Inspection was submitted by two Batwa individuals residing near a PA within the Project area (hereafter referred to as “the Requesters”). They say they speak on behalf of the Batwa Indigenous People.

v. The Request alleges that the Project: (i) perpetuates historical injustices against the Batwa people, (ii) excluded the Batwa from meaningful participation in the Project, (iii) allowed “unauthorized representation” during the consultations, (iv) missed the opportunity for Batwa participation in co-management and sharing of revenues generated from tourism, (v) disregarded the Batwa’s traditional forest knowledge and cultural practices, (vi) exploited Batwa culture, and (vii) excluded Batwa communities from receiving tourism revenues. The Request also raises concerns about reprisal and intimidation against Batwa representatives.

Management’s Response

vi. ***Management has carefully reviewed the issues raised in the Request for Inspection and concluded that the adverse impacts raised in the Request largely result from developments that long predate the Project and have no connection to the Project.*** Management recognizes the difficult situation of Batwa communities in Uganda that largely stems from their displacement from protected areas 30 to 60 years before the Project. This historic displacement has diminished the Batwa’s traditional means of subsistence, and with few Batwa integrated into other economic sectors, it remains the central cause of the widespread deprivation and poverty among Batwa communities. This challenging historical context and the socio-economic situation of the Batwa were recognized and assessed by the Project, helping to inform its design and implementation. However, Management disagrees that the Project is perpetuating or worsening the situation of Batwa communities. ***On the contrary, the Project has actively consulted with and included Batwa communities, providing them with access to Project benefits (e.g., livelihood support, protection from human-wildlife conflicts), and supporting their regularized access to the PAs.***

vii. ***In Management’s view, there is no basis for the Requesters’ assertion that they experienced harm as a result of the Bank-supported Project.*** The Request provides no explanation or example of how and where the Project would cause such harm. The Request is mainly focused on impacts stemming from the historic physical relocations, which are not linked to the Bank-supported Project and cannot be addressed by the Bank. Management understands that Batwa groups are pursuing the matter in the Ugandan High Court, which is the appropriate avenue to have these grievances reviewed and addressed. It is important to note that the Project does not support any activities that could affect the Batwa’s historic claim for restitution or compensation, which they continue to pursue in court. Therefore, it is not clear how the Project could have caused or contributed to adverse impacts affecting the Batwa that would have existed even without the Project.

viii. ***In Management’s view, key allegations in the Request represent the Requesters’ unfulfilled expectations from the Project, rather than actual harm caused by it.*** The Request articulates the desire that the Project act as a platform to rectify historic injustices and “*decades of marginalization*” which is neither the Project’s objective, nor could such objective be achieved by the Project. Moreover, the Request raises concerns about insufficient Batwa participation in the Government’s benefit-sharing and revenue-sharing arrangements that are unrelated to the Project. Contrary to the allegations in the Request, the Project does not support activities and related revenues that commercialize Batwa culture.⁴

ix. ***Management is aware of disagreements between various groups within the Batwa community and the challenges resulting from ongoing competing leadership claims.*** The Project’s efforts to include all relevant stakeholders that support Batwa communities are characterized in the Request as allowing “unauthorized” representation. Management is not aware of a unified representative or organization that is recognized to speak on behalf of all Batwa communities. In this context, the Requesters have indicated in previous interactions with the Bank that they view themselves as the sole legitimate representatives.

x. ***The allegation that the Project allowed “unauthorized representation” misunderstands the broad consultation requirements of Environmental and Social Standards 7 and 10 and overlooks the diverse views and leadership structures of Batwa communities, which are not represented by a single leader or organization.*** The Request consistently misrepresents the purpose of Project-related consultations, which are intended to give stakeholders an opportunity to express their views on the Project. The Request suggests that these consultations failed to provide legitimate political representation of the Batwa, even though achieving such representation was neither intended nor was it required for the Project.

xi. ***Management confirms that the consultations undertaken with Batwa communities meet policy requirements and can be considered broad and meaningful. Management further confirms that Project benefits have been provided to the Batwa.*** There have been extensive consultations with Batwa communities represented by individuals and civil society organizations (CSOs). Overall, from 2020 to 2025, four rounds of consultations have been held with 28 nongovernmental organizations (NGOs)/CSOs working for the benefit of the Batwa (both Batwa-led and non-Batwa led), which directly involved about 10 percent of the total Batwa population in Uganda. To date, more than 230 Batwa households have benefitted from direct Project support through, among others, investments in fuel-efficient cook stoves and rainwater harvesting tanks, and targeted vocational training and business development training. Several Batwa communities have gained or maintained regularized access to the economic resources inside PAs with support from the Project. ***There is no indication or evidence that Batwa communities were excluded from Project consultations, participation, or benefits.***

⁴ Management notes that the Board Resolution on the Accountability Mechanism explicitly stipulates that “Non-accomplishments and unfulfilled expectations that do not generate a material deterioration compared to the without-project situation will not be considered as a material adverse effect for this purpose” (Paragraph 39).

Conclusion

xii. *In Management's view the Bank has correctly applied its policies and procedures applicable to the Project, as well as 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 or adversely affected by a failure of the Bank to implement its policies and procedures.*

I. INTRODUCTION

1. On October 14, 2025, the Inspection Panel registered a Request for Inspection, IPN Request RQ25/05 (hereafter referred to as “the Request”), concerning the Uganda: Investing in Forests and Protected Areas for Climate-Smart Development Project (P170466) (IFPA-CD or the “Project”) financed by the International Development Association (IDA or “the Bank”).

2. ***Structure of the Text.*** Section II of this Management Response presents the Request, Section III provides background on the Project, Section IV discusses additional background on relevant issues; and Section V contains Management’s response to the allegations in the Request. Annex 1 presents the Requesters’ claims, together with Management’s detailed responses, in table format.

II. THE REQUEST

3. The Request for Inspection was submitted by two Batwa individuals residing near a Protected Area (PA) within the Project area, who say they speak on behalf of the Batwa Indigenous People (hereafter referred to as “the Requesters”). The Requesters asked for confidentiality.

4. The Request alleges that the Project: (i) perpetuates historical injustices against the Batwa people; (ii) excluded the Batwa from meaningful participation in the Project; (iii) allowed “unauthorized representation” during the consultations; (iv) thus missed the opportunity for co-management and sharing of revenues generated from tourism; (v) disregarded the Batwa’s traditional forest knowledge and cultural practices; (vi) exploited Batwa culture; and (vii) excludes Batwa communities from receiving tourism revenues. The Request also raises concerns about reprisal and intimidation against Batwa representatives.

III. PROJECT BACKGROUND

5. ***The Project.*** The Project was approved by the Board of IDA on April 23, 2020, and became effective on August 18, 2021. It was formally launched in March 2022, when the restrictions related to the COVID pandemic began to ease; however, Project activities on the ground in the four PAs subject to this Request for Inspection started much later.¹ A first restructuring of the Project was approved in December 2024 to finetune the Project objectives and better define the Project’s geographic scope.² A second restructuring of the Project was approved in November

¹ The delay was due to a provision in the Project Environmental and Social Commitment Plan (ESCP) that activities in these four PAs could only start after preparation of site-specific Vulnerable and Marginalized Groups Plans (VMGP). This was done to ensure that consultations and engagements with the Batwa community members meaningfully informed implementation.

² As part of the restructuring, the Ajai Wildlife Reserve was excluded from the Project’s scope because resettlement activities unrelated to the Project had commenced at the site, which had not been anticipated by the Project and which were not an eligible activity under the Project.

2025 to make adjustments in the scope of activities to allow more efficient utilization of Project resources within the remaining Project period, reflect related changes in the results framework, further finetune the definition of the Project target landscapes,³ and support mitigation of assessed risks related to Project support to infrastructure and equipment for PA management. Changes introduced through these two restructurings do not have relevance for or impacts on the claims raised in the Request for Inspection. The Project financing (US\$148.2 million equivalent) is provided through an IDA credit (US\$78.2 million equivalent) and a grant from the IDA18 Refugee Sub-Window (US\$70 million equivalent). The Ministry of Water and Environment (MWE) is the coordinating ministry for the Project and is responsible for the implementation of activities in and around Central Forest Reserves (CFRs) (which were previously implemented by the National Forestry Authority (NFA)),⁴ activities in refugee-hosting areas, and production forestry activities. The NFA was dissolved through the National Forestry and Tree Planting (Amendment) Act 2025 as of August 1, 2025, as part of an ongoing and broader rationalization exercise of government agencies in Uganda. The Uganda Wildlife Authority (UWA) is responsible for implementation of Project activities in and around wildlife PAs, including national parks and wildlife reserves. The Project's closing date is June 30, 2026.

6. **Background.** Uganda is experiencing one of the highest rates of forest loss globally, with forest cover reducing from 15.8 percent of the country's land area in 2000 to 11 percent in 2023.⁵ The primarily nature-based tourism sector recorded a 25.9 percent surge in earnings in 2024 and now accounts for 3.2 percent of gross domestic product (GDP) and 7.2 percent of total employment.⁶ Despite their vital role in tourism and natural resource-based livelihoods, forests are under threat due to weaknesses in management, limited infrastructure, and the spread of invasive species, which pose long-term ecological and economic risks. Greater public investment, strategic planning, and community involvement are essential to conserve forests, ensure sustainable use of natural resources, and improve economic outcomes.

7. The Project was prepared to support forest conservation, forest utilization, and tourism sectors in the country. The Project supports a landscape approach to improve management and economic productivity of forest ecosystems. It combines investments in forest management in both state- and community-managed lands and focuses on improving the management of forests, increasing revenues for sustaining forests, and supporting resilient livelihoods for communities.

8. **Project Objectives.** The objectives of the Project are to improve sustainable management of forests and PAs in target landscapes; and to increase benefits to communities from forests in target landscapes.

³ The definition of the target landscapes limits the Project area to the selected PAs (CFRs, National Parks, and Wildlife Reserves, as listed in Annex 1 of the Project Restructuring Paper), and an area within a 10-km radius of each of these (for activities related to PA management), in addition to the Refugee Hosting Areas as already defined in the legal agreement.

⁴ As an interim measure, NFA staff will be retained under the same agency name and with the same functions until December 31, 2025.

⁵ <https://data.worldbank.org/indicator/AG.LND.FRST.ZS?locations=UG>

⁶ <https://www.tourism.go.ug/single-post/uganda-s-tourism-sector-hits-record-high-of-us-1-28-billion-in-2024>

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

- Component 1 (US\$50.0 million equivalent) focuses on improving co-management and restoration of government-managed forest and wildlife PAs to ensure they can continue to generate revenues and provide important environmental services; this component also supports activities aimed at reducing human-wildlife conflict along the park boundaries and supporting sustainable livelihoods investments for the park-adjacent communities through a community conservation approach.
- Component 2 (US\$40.2 million equivalent) aims to increase revenues and jobs from these forest and wildlife PAs through targeted investments in tourism and production forestry.
- Component 3 (US\$51.2 million equivalent) encourages establishment of increased tree cover in refugee-hosting landscapes on host community land outside PAs and supporting sustainable forest management and landscape resilience on private and customary land. This component is wholly funded by the IDA18 Refugee Sub-Window.
- Component 4 (US\$6.8 million equivalent) supports overall project management and monitoring, including environmental and social risk management.

10. The Project has a proactive focus on expanding the involvement of local communities in the management of 37 PAs,⁸ with the goal of maintaining or increasing their regularized access and benefits from these areas. Four of these PAs are the subject of this Request for Inspection: Bwindi Impenetrable National Park (“Bwindi”); Mgahinga Gorilla National Park (“Mgahinga”); Semuliki National Park (“Semuliki”); Echuya Central Forest Reserve (“Echuya”). The Project aims to increase benefits for communities living adjacent to the target PAs by supporting regularized access to resources inside these areas and also providing support for livelihoods activities and household improvements that reduce their reliance on natural resources from the PAs, such as firewood and water. These objectives are pursued through Project support via the co-management approaches of Collaborative Resource Management (CRM) and Collaborative Forest Management (CFM) by UWA and MWE (formerly NFA), respectively.⁹ Under these resource (CRM) or forest (CFM) management arrangements, UWA and MWE partner with a community group, share responsibilities (such as monitoring to protect integrity of the resources and tree planting inside the PA (under NFA only)) and share benefits (such as permitted forest/PA uses, agency support for income-generating activities and other activities that reduce dependence on resources inside the PAs), all of which is recorded in a negotiated Memorandum of Understanding (MoU).

11. The consistent objective of these co-management and participatory approaches is to encourage community sensitization, collaboration, and participation in the management of resources through regularized access and ensure that the local communities meaningfully benefit from sustainable PA management. In fact, CRM (originally called *Multiple Use Programme*) was

⁷ Allocations of funds by component are as per the second Project restructuring, approved in November 2025.

⁸ This includes seven national parks and three wildlife reserves (managed by UWA) and 27 CFRs (managed by MWE (formerly NFA)).

⁹ These arrangements are governed by the National Forestry and Tree Planting Act 2003 and Wildlife Act 2019 (and its predecessor, the Uganda Wildlife Act Cap. 200) (1996), and UWA’s Community Conservation Policy (2019).

first introduced in Bwindi and Mgahinga in the early 1990s through written agreements of the communities with UWA's predecessor, the Uganda National Parks, in programs to implement collaborative management of plant (flora) resources, beekeeping and honey collection.¹⁰

12. The Project to date has supported the establishment of 19 CFM groups for 13 CFRs under NFA¹¹ and plans to assist MWE in rolling out updated CFM guidelines. Under UWA, staff in ten PAs have been trained in negotiating and renewing CRM agreements with a gender focus. These UWA staff have been supported in renewing one existing and negotiating one new MoU for resource access (with community groups) per PA, with plans to facilitate up to 20 additional MoUs. Additionally, the Project supports community livelihoods through training and inputs (e.g., beekeeping, crafts, business skills, and efficient energy and water use) and provides mobility support for field staff to enhance community engagement.

13. None of the Project activities change the legally established boundaries of the four target PAs subject to this Request for Inspection (listed in paragraph 10), which were gazetted in 1930s and 1940s, and further changed in the 1990s, prior to the Project, nor do they introduce or require additional restrictions, or focus on enforcing them.¹² The Project has provided limited support in these four target PAs for protected area management by UWA and MWE (formerly NFA) by financing some equipment for UWA and MWE (cars, motorbikes, one drone per PA (under UWA, none under NFA), radio equipment, binoculars, and GPS equipment) and capacity building. This equipment has been especially useful to support community conservation and ecological monitoring (e.g., reducing human-wildlife conflict) by the agencies.¹³

¹⁰ UNESCO People and Plants Initiative: Conservation through community use of plant resources: establishing collaborative management at Bwindi Impenetrable and Mgahinga Gorilla National Parks, Uganda, 1996. <https://unesdoc.unesco.org/ark:/48223/pf0000111731>; Echuya CFR was one of the first reserves in Uganda with CFM: <https://envalert.org/wp-content/uploads/2021/03/CFM-Review-Final-Version-29Apr19.pdf>

¹¹ Except those in Echuya, as their re-negotiation was supported by another development partner.

¹² There are other PAs under the Project where Project support is used for demarcation of CFR boundaries using pillars. Infrastructure, such as electric fencing and trenching, is used in some Project PAs as a means of managing human-wildlife conflicts (with appropriate provisions for human access in place). None of this, however, is supported in the four PAs that are the subject of the Request for Inspection.

¹³ Project investments in the PA management capacity of UWA and NFA are twofold:

- (i) The Project has planned (but not yet supported) construction and renovation of staff outputs / housing for the agencies' staff and some equipment. Feedback from the park-adjacent communities (e.g., during engagements in Bwindi) indicate that they appreciate having UWA staff in close proximity, as this allows them to respond faster in cases of human-wildlife conflict, when animals leave the park and enter community farms, destroying the crops or sometimes even injuring community members. Equipment provided under the Project to UWA is assigned to different units (community conservation, tourism, environmental monitoring and research, and law enforcement). The Project supported purchase of the following: three vehicles for UWA – 1 per PA (of these, the vehicles in Bwindi and Mgahinga were assigned to the community conservation unit and the vehicle in Semuliki is for general park use); 27 motorcycles for UWA – 14 for Bwindi, 7 for Mgahinga, and 6 for Semuliki (of these, 13 were assigned to community conservation units, 8 to law enforcement units, 3 to environmental monitoring and research units, and 2 to tourism units); 34 binoculars for UWA – 16 for Bwindi, 9 for Mgahinga, and 9 for Semuliki (of these, 20 were assigned to law enforcement units, 12 each to community conservation and tourism units). For NFA in Echuya, the Project supported purchase of 1 motorcycle, 1 GPS device, and 2 binoculars – these are for general CFR staff use).
- (ii) The Project has provided UWA and NFA staff with trainings on conflict management, incident reporting, Bank safeguards, and inclusion and non-discrimination. The Project is also supporting the ongoing review and revision of SOPs with regard to law enforcement to better align them with international good practice; this will be followed by training of UWA staff on the revised SOPs.

14. MWE (including former NFA) and UWA staff have been provided with training on World Bank Environmental and Social Standards (ESSs) and incident reporting. As part of the ongoing supervision, the World Bank is also providing technical assistance to UWA and MWE (formerly NFA) on enhancement of their Standard Operating Procedures (SOPs) to be better aligned with good international practice. Under the second restructuring, the Project also allocated resources to support training of staff on these revised SOPs—once they are satisfactory to the Bank—and to expand community awareness activities. Provision of this type and scale of institutional strengthening support enhances the capacity of MWE (formerly NFA) and UWA to carry out their mandate in a manner consistent with good international practice.

15. In areas where there are national security concerns, e.g., near the border with the Democratic Republic of Congo,¹⁴ the Uganda Peoples' Defence Forces (UPDF) is based within UWA-managed PAs. This deployment is specifically to ensure national security within these PAs, e.g. to prevent incursions by militias and armed rebel groups from the DRC.

16. UPDF also has an MoU with UWA for secondment of UPDF staff to UWA. This, supplemented by a more detailed operational agreement, is to regulate the status and conduct of UPDF staff when seconded to UWA. However, such secondments have not occurred apart from the deployment of 7 UPDF liaison officers to UWA.

17. MWE (formerly NFA) draws on the support of UPDF (its specialized Office of the Coordinator National Vital Assets and Strategic Installations) to provide security to NFA staff where required during operations, including in Echuya. Since NFA has been dissolved and responsibilities transferred to MWE, the Bank has requested that a comparable operational agreement, satisfactory to the Bank, is signed between MWE and UPDF (this is a disbursement condition under the second restructuring for continued funding of core support activities for MWE as they relate to management of CFRs).

¹⁴ These include Bwindi, Mgahinga, and Semuliki.

IV. ADDITIONAL BACKGROUND

Historic Batwa claims predating the Project

18. *The Batwa were displaced decades ago from some of the areas where the Project is now being implemented. The gazettement of these protected areas took place in the 1930s and 1940s with subsequent displacement occurring between the 1960s and early 1990s.*¹⁵ It is evident that these displacements long predate the Project and are entirely unrelated to it. The Batwa today mostly live adjacent to four PAs supported by the Project:

- Bwindi Impenetrable National Park, first gazetted in 1932;
- Echuya CFR, first gazetted in 1941;
- Mgahinga Gorilla National Park, first gazetted in 1930; and
- Semuliki National Park, first gazetted in 1932.

19. *While these PAs were created in the 1930s and 1940s, involuntary resettlement from some of them occurred over time, with the final relocations taking place in the early 1990s.*¹⁶ In 1930, Mgahinga Forest was gazetted as a gorilla sanctuary and as a National Park in 1991. In 1932, Bwindi Forest was gazetted as Kayona and Kasatoro Crown Forest Reserves (later Bwindi Forest Reserve); these two reserves were combined to form the Bwindi (Impenetrable) Central Crown Forest in 1942. Bwindi then was additionally gazetted as a Game Reserve in 1961 and as a National Park in 1991. Echuya Forest was gazetted as crown forest in 1941 and became a CFR in 1948. Semuliki was first gazetted as a forest in 1932; it became a Forest Park in 1992 and was gazetted as a National Park in 1993.

20. Various contemporary reports confirm the displacement timelines of decades ago. As an example, the 1996 UNESCO report, *“Conservation through community use of plant resources: establishing collaborative management at Bwindi Impenetrable and Mgahinga Gorilla National Parks, Uganda,”*¹⁷ provides information related to displacements from Bwindi and Mgahinga. This report confirms the timeline currently reported in media sources (and in the Request) and indicates that displacement from both these PAs long predates the 1990s.

¹⁵ General references for Bwindi, Mgahinga, and Echuya are drawn from the text of the Constitutional Petition #003 of 2013 of the United Organization for Batwa Development in Uganda and 11 individuals against the Government of Uganda as well as from Christopher Kidd (2008) *Development Discourse and the Batwa of South West Uganda: Representing the 'Other:' Presenting the 'Self,'* available at <https://theses.gla.ac.uk/169/>. Some references are also drawn from the Management Plans for these PAs. General references for Semuliki are drawn from the General Management Plan for this PA. Specific references are cited throughout the text.

¹⁶ The Forest Act 1964 prohibited human residence inside protected forests.

¹⁷ <https://unesdoc.unesco.org/ark:/48223/pf0000111731>.

Bwindi

According to the cited UNESCO report, Batwa and Bakiga communities in Bwindi once lived within the forest, but people were gradually relocated over many years, making the timeline unclear. The Batwa, who depended more on the forest, remained longer; about 100 were still living there nomadically in 1961, and their final removal by the Forest Department likely occurred gradually after 1964. Today's Batwa recall that only their grandparents lived in the forest, though some still enter it temporarily. Former settlement sites have since regenerated into secondary forest, and cultivation inside the forest continued under the taungya system until the 1980s.

Mgahinga

The Gorilla Game Sanctuary was created in 1930 and the Mgahinga Forest Reserve in 1941. They shared a boundary until 1951 when 10 km² were degazetted for local cultivation. Although the Game Reserve was later expanded in 1964, its new boundaries were not enforced, leaving residents technically as illegal encroachers. During park establishment discussions in 1990, it was agreed to restore the boundary to its pre-1951 line, implemented in 1991. According to the UNESCO report an agreement followed to relocate affected residents peacefully, with promises of compensation and development support. By 1992, about 220 households had moved and 2,000 landowners stopped cultivation; compensation was paid in 1993, and the process was noted for being negotiated rather than forced.

Semuliki

The Batwa historically settled in the Semuliki forest. In 1993, the forest reserve was turned into a National Park. With its establishment, the Batwa were removed from Semuliki and placed in a camp called Kabwero along the roadside where they stayed until they were relocated to Bulondo. An international NGO convinced the Batwa to resettle near Ntandi in a bid to integrate them into local cultural and agricultural life though the integration has been rather slow.¹⁸

21. ***Project preparation took into account the fact that the Batwa were displaced decades ago from some of the areas where the Project is now being implemented.*** While it is evident that these events long predate the Project and are unrelated to it, this historical context was nevertheless recorded and considered during Project preparation, and the stakeholder engagement process factored this in to ensure sensitivity to the Batwa's circumstances and to promote inclusive benefits for their communities where possible. Specifically, the Vulnerable and Marginalized Groups Framework (VMGF) acknowledges the historical displacement of the Batwa from the four PAs subject to this Request for Inspection. The Project has maintained specific consultations with the Batwa and designed specific interventions for them that correspond to their reliance on natural resources.

¹⁸ See: Cross Cultural Foundation of Uganda 2017: In the Name of Conservation. The Eviction of the Batwa from Semuliki Forest, Bundibugyo; Uganda Wildlife Authority, Semuliki National Park General Management Plan, 2017/18-2026/27.

22. ***The matters related to historical resettlement of the Batwa are currently being adjudicated by the Ugandan judiciary.*** The Batwa claim they have been removed and progressively alienated over nearly a century from their ancestral lands, on which the present day Echuya CFR, Bwindi Impenetrable National Park and Mgahinga Gorilla National Park are situated, by the Government, without compensation.¹⁹ They filed a petition for redress against the Attorney General, UWA and NFA with the Constitutional Court in 2013.

23. On August 19, 2021, the Constitutional Court of Uganda delivered its decision recognizing that the Batwa's ancestors had inhabited and held interest in the lands before displacement, and that no adequate compensation had ever been paid. The Court, however, declined to decide on restitution of ownership or other broad remedies sought by the Petitioners (such as recognition under international law), although it found that affirmative action measures were constitutionally mandated. The matter was referred to the High Court of Uganda to determine which affirmative action measures were appropriate for the Batwa.

24. Following the Constitutional Court's judgement, the Attorney General filed an appeal with the Supreme Court, contesting the Constitutional Court's findings. The Supreme Court has not yet delivered its decision on the appeal.

Economic and social situation of the Batwa in Uganda today

25. The Batwa of Uganda traditionally lived as hunter-gatherers in the forests of southwestern Uganda, particularly in and around what is now known as the Bwindi, Mgahinga, and Echuya forests.²⁰ Their livelihoods, identity, and spirituality were deeply tied to these forests. However, between the 1960s and the early 1990s, the Batwa were displaced to create protected areas mainly aimed at conserving mountain gorillas. Many Batwa were displaced without compensation, land, or alternative livelihoods, marking the start of widespread economic and social hardship. Today around 4,000 individuals that identify as Batwa live in Uganda in the vicinity of Bwindi, Echuya, Mgahinga and Semuliki PAs.²¹

26. Most Batwa today live in extreme poverty. Lacking land ownership, they often work as casual laborers. Their displacement has diminished their traditional means of subsistence, and few have been integrated into tourism or conservation jobs. Landlessness remains the central cause of their economic deprivation, often leaving them dependent on neighboring communities, who frequently discriminate against them.

27. Socially, the Batwa are among Uganda's most marginalized groups. Literacy rates are extremely low, and access to education, healthcare, and clean water is limited. Many Batwa settlements are in remote, underserved areas. They face stigma from other ethnic groups, which further restricts social mobility and inclusion.

¹⁹ The court case does not include Semuliki National Park.

²⁰ Historically all three used to be part of one single *South Western Forest* (as referenced in the court case documentation).

²¹ Uganda National Population Census 2024.

Proposed change of status of Echuya CFR

28. During the implementation support mission conducted from August 25 to September 5, 2025, the Bank team was informed of the Government's plans to change the status of three PAs that are part of the Project and to declare them as national parks under the Uganda Wildlife Act 2019. This would affect one of the PAs (Echuya CFR) that is subject to the Request for Inspection.

29. During the mission meetings and in the follow-up engagements during the high-level visit of the World Bank's Division Director, the Bank expressed concerns about the potential impacts of these changes. Such a change of status was not anticipated, assessed or provided for during Project preparation and implementation. Even though such a change in status would not be a Project activity, it could have implications for community access to PA resources and livelihoods dependent on such resources.

30. The changes would therefore also undermine the Project's ability to achieve and sustain its objectives, particularly by potentially limiting local communities' access to resources within PAs, which the Project seeks to promote and facilitate. National parks are subject to the highest level of protection and place the most stringent restrictions on human activities within PAs under Ugandan law. The Bank reiterated these concerns to the Government in writing (in October 2025), clarifying that the Project was neither intended for, nor is it equipped to accommodate such significant changes during implementation. Hence, the Bank communicated that such proposed change in status would risk impairing the Project's support for those PAs. Management continues to monitor the situation and the Government's position, as the proposal is currently still under consideration in Parliament.

Integration of lessons learned from the Tanzania REGROW Project

31. Though taking a different approach to biodiversity conservation and community engagement from the Tanzania Resilient Natural Resource Management for Tourism and Growth project (P150523) ("REGROW"), the Project has integrated relevant lessons from REGROW during implementation. The PAs supported by the Project have adopted an inclusive approach to biodiversity protection and PA management, with strong focus on community conservation and collaboration. Moreover, the threat to biodiversity from poaching and other illegal activities in the four PAs subject to this Request for Inspection, which is a key driver of law enforcement activities, also differs significantly.²² However, since its review of the REGROW project, Management has been supporting the Government to incorporate applicable lessons learned from that process into this Project, which also involves issues related to communities living around PAs. This ongoing process is also informed by the Bank's January 2025 Interim Guidance Note on Managing the Risks of Projects Involving Protected Areas. The Bank team, supported by a specialist on protected area management, has supported the Borrower to review these lessons and adjust the Project to better manage these specific risks. This work, which is ongoing, also built on previous government assessments of social conflicts around natural resources.

32. Actions undertaken to adjust the Project have focused on the following aspects:

²² For example, in 2024 there were seven cases in Semuliki that led to legal action, four in Bwindi, and none in Mgahinga.

- ***Institutional assessments for NFA—now MWE—and UWA and updates of the SOPs of these institutions.*** Rapid institutional assessments began in August-September 2024, and key measures and activities were identified and included in the Project as part of the second restructuring. These specific activities focus on: (i) updating the SOPs and associated training curricula to align them with good international practice and operationalize them; (ii) delivering initial training (informed by the institutional assessments) to the staff of these institutions involved in law enforcement activities in PAs; (iii) community awareness and sensitization; (iv) rolling out of the CFM guidelines (former NFA, now MWE); and (v) scaling up of monitoring technologies. The work to finalize the institutional assessments and update of the SOPs is ongoing with support from a reputable firm with experience in PA management and security. The institutional assessments and SOP revisions for UWA are expected to be completed by December 2025; institutional assessment and revision of SOPs for NFA (activities in CFRs) are pending due to the integration of NFA into MWE. The Bank will need to review the proposed institutional arrangements following the transition of NFA to MWE, including with regard to the above-cited issues, before deciding on further Project support to MWE, as it relates to core PA management functions for activities in CFRs.
- The Project also undertook ***measures to strengthen its Grievance Mechanism (GM)*** by: (i) including additional channels for submission of grievances, such as GM hotlines, in the implementing agencies (MWE (formerly NFA) and UWA); (ii) placing complaint/suggestion boxes for submission of anonymous feedback in various Project PA sites and communities (this process is ongoing); and (iii) enhancing dissemination of information (using posters) in the Project area with information on the GM hotlines (toll-free numbers). These changes have been in place since September 2024, and the ***Stakeholder Engagement Plan (SEP)*** was revised in October 2025 to incorporate these updates and was disclosed on November 4, 2025.²³
- ***An updated and expanded incident reporting protocol was agreed with the Borrower in September 2024,*** clarifying that serious incidents related to PA rule enforcement in the Project area must be reported to the Bank. The protocol has been in use since then and integrated into Project documentation. The Project Implementation Manual (PIM) has been revised to incorporate the expanded protocol and has been disclosed;²⁴ the update of the Environmental and Social Management Framework (ESMF) is also ongoing. The protocol sets out criteria, procedures and timeframes for managing reportable severe incidents, as well as other non-reportable incidents that still require documentation and action.
 - Severe incidents, as defined in the ESMF, include those likely to have significant adverse effects on the environment, affected communities, the public, or workers, that involve contractors, government officials, or project beneficiaries. Examples include environmental pollution exceeding standards, forced evictions, abuses by PA management personnel, fatalities, lost-time injuries, and gender-based violence (GBV). These must be reported to the Bank within 24 hours using structured notification forms, with additional details for GBV incidents. Follow-up

²³ <https://mwe.go.ug/downloads/stakeholder-engagement-plan-sep-ifpa-cd/>

²⁴ <https://mwe.go.ug/downloads/ug-ifpa-cd-project-pim/>

information, including investigations, root causes, corrective actions, and outcomes, is provided as it becomes available.²⁵

- Non-reportable incidents—such as localized noise or dust, small spills, minor crop or livestock damage, minor security issues, and minor job-site injuries—are recorded in quarterly environmental and social reports and Project Aide-Memoires. Recurrent minor incidents indicating systemic issues are treated as severe and reported to the Bank.

This system ensures all incidents are tracked, addressed appropriately, and that serious events are promptly managed and investigated.

- A Process Framework has been in place under the Project since the Project start; it was prepared and disclosed during Project preparation, in December 2019. The Government has started to update it to more clearly identify potential access restrictions due to Project activities in all PAs under the Project and to better describe the process to manage any such identified restrictions and mitigate impacts in a collaborative and participatory manner with PA-adjacent communities. In this regard, the updated Process Framework will better capture the co-management approach set out in Ugandan law (which provides for regularized access and benefits for community members that are part of CRMs and CFMs), which is aligned with the requirements of ESS5 on Process Frameworks to manage in a participatory way impacts from restrictions of access on park-adjacent communities.
- A first Project restructuring was undertaken in December 2024 to clarify the geographic scope of Project interventions; this entailed both a refinement of the Project Development Objective and the specific enumeration of PAs within the scope of the Project.
- The **Environmental and Social Commitment Plan (ESCP)** has also been updated (as part of the second restructuring) to reflect the above aspects. The updated ESCP is incorporated by reference in the latest amendment to the legal agreement.

²⁵ The Government of Uganda reported three incidents (two fatalities and one serious injury) under the expanded incident reporting protocol adopted in September 2024:

- **First incident** – October 1, 2024, in Queen Elizabeth National Park. A community member was injured within the park by an unknown armed assailant. There were no Project-related activities ongoing in that area, and there is no evidence of UWA staff being present in that area on that day. The Bank’s Incident Cause Committee (ICC) reviewed and determined that the Project was not related to the incident.
- **Second incident** – March 23, 2025, in Kikuube District close to the Bugoma CFR during NFA’s operation related to seizure of suspected illegally harvested wood. An altercation between the patrol team and community members escalated and resulted in the death of one community member, injuries to another community member and to two members of the patrol team. The root cause analysis (RCA) was finalized in September 2025. Based on the RCA, the ICC deemed the incident Project-related in its decision dated November 2, 2025, as the incident occurred during NFA enforcement activity. The corrective action plan will be implemented by MWE under supervision of the Bank.
- **A third incident** – August 2020 in Echuya CFR – was reported to the Bank by the community during consultations in July 2025, as an incident which reportedly took place in 2023 and resulted in a fatality. No further details were provided at the time, including to counterparts. Based on investigation by NFA, corroborated by records from a local medical facility, it was confirmed that a fatality had occurred in that location, though not as originally reported, in 2023, but, much earlier, in August 2020 (after Project approval but prior to effectiveness). Based on the current information, the incident is not considered Project-related; however, final determination has not been made by the Bank on this.

V. MANAGEMENT'S RESPONSE

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

34. ***Management has carefully reviewed the issues raised in the Request for Inspection and concluded that the adverse impacts raised in the Request result mainly from developments that long predate the Project or have no connection to it.*** Management recognizes the difficult situation of Batwa communities in Uganda that largely results from their displacement from PAs that occurred 30–60 years before the Project. Their specific situation has been considered during and reflected in the preparation of the Project and its documentation. Management disagrees, however, that the Project is perpetuating or worsening the situation of Batwa communities. It is not clear how the Project could have caused or contributed to adverse impacts affecting the Batwa that would have existed even without the Project. On the contrary, the Project has actively consulted and included Batwa communities, providing them with access to Project benefits and enhanced regularized access to the PAs.

35. ***In Management's view there is no basis for the Requesters' assertion that the alleged harm is related to the Bank-supported Project.*** The Request is mainly focused on the historical physical displacements that took place over many decades, which have left lasting impacts on the Batwa communities, but which are not related to the Project. Since these displacements are not linked to the Bank-supported Project, the Bank is not the correct avenue to help address these claims. Management understands that Batwa groups are pursuing the matter in the Ugandan High Court, which is the appropriate avenue to have these grievances addressed.²⁶ It is important to note that the Project does not support any activities that could impact the Batwa's claim to these areas, which they continue to pursue in court.

36. ***In Management's view, key allegations in the Request reflect the Requesters' unfulfilled expectations about the Project, rather than identify actual harm caused by the Project.***²⁷ Requesters had hoped that the Project could become a platform to rectify "decades of marginalization," which is not the Project's objective. While the Request asserts that the Project is harming Batwa communities, it provides no explanation or examples of how such harm would be caused by the Project, or even plausibly be linked to it.

37. ***Management is aware of disagreements between various groups within the Batwa community and the challenges resulting from competing leadership claims.*** While the Request claims there has been "unauthorized" representation, it fails to specify which representative or organization would be "authorized" to speak on behalf of (all or some) Batwa communities. Previous interactions with the Requesters, and written communications from them to the Bank, have indicated that they view themselves as the sole legitimate representative and have requested that other Batwa-led organizations be excluded. At the same time, other Batwa leaders say that they are also legitimate representatives of the Batwa community and have requested the Bank to

²⁶ The court case covers historic eviction from Bwindi, Echuya, and Mgahinga, but not from Semuliki.

²⁷ Management notes that the Board Resolution on the Accountability Mechanism explicitly stipulates that "Non-accomplishments and unfulfilled expectations that do not generate a material deterioration compared to the without-project situation will not be considered as a material adverse effect for this purpose" (Paragraph 39).

include them in Project consultations. These leadership disputes have not been caused by the Project; however, they are central to the Request for Inspection.

38. ***Management confirms that the consultations undertaken with Batwa communities meet policy requirements and can be considered broad and meaningful. Management further confirms that Project benefits have been provided to the Batwa.*** There have been extensive and meaningful consultations with Batwa communities represented by individuals and civil society organizations (CSOs). Overall, Project consultations have reached about 10 percent of the entire Batwa population in Uganda. To date, more than 230 Batwa have benefitted from direct Project support through, among others, investments in fuel-efficient cook stoves and rainwater harvesting tanks, and targeted vocational training and business development training. Many Batwa communities have gained regularized access to the economic resources inside PAs with support from the Project. There is no indication or evidence available to the Bank or the Borrower that Batwa communities were excluded from Project consultations, participation or benefits.

39. Management responds below to the allegations put forward in the Request.

Alleged perpetuation of historical injustices against the Batwa people

40. ***Management recognizes the difficult situation of the Batwa communities and acknowledges that they are among the most marginalized groups, having lost access to ancestral forests, which affected their traditional livelihoods of hunting and gathering.*** Most Batwa communities still live in extreme poverty and struggle to preserve their culture in a rapidly changing environment.

41. ***However, Management disagrees that the Project “replicate[s] and further[s]” injustices against the Batwa people. On the contrary, the Project has successfully supported Batwa community livelihoods and their regularized access to natural resources in PAs.*** The Request does not explain or provide evidence of how and where the Project would cause the alleged harm to Batwa communities. Participation in the community activities under the Project is voluntary, and no adverse impacts on Batwa communities would result from their decision to participate, or not participate, in the Project. The Project activities that support the livelihoods of communities around PAs target PA-adjacent communities, including Batwa communities.

42. ***Some of the main allegations in the Request represent unfulfilled expectations from the Project, rather than identify harm caused by it.*** The expectation that the Project would rectify past developments and injustices is central to the Request. In the Requesters’ view and their own words, the “*project represents a critical opportunity for co-management and benefit-sharing that could address decades of marginalization.*” Management notes that while the Project does indeed contribute to addressing Batwa marginalization through livelihood development, addressing “decades of marginalization” exceeds the scope of the Project. Moreover, failure to achieve such

aspirations would not represent harm caused by the Project. The cited revenue-sharing schemes, as is explained below in more detail, are not part of the Project.²⁸

43. ***The Project provides support for maintaining and expanding the Batwa communities' regularized access to PAs rather than restricting such access.*** Importantly, the Project has supported the renewal and signing of additional CRM/CFM MoUs, including in Bwindi, Mgahinga and Semuliki, to maintain and expand regularized access to PAs as established under national law.²⁹ The Project has actively promoted increased Batwa participation in CFM and CRM arrangements and, notably, it has helped the Batwa to have representation in Resource Use Group Committees. Hence, the Project has sought to reduce the pre-existing access restrictions that were introduced with the historic gazettement and displacements in the 1990s and maintain collaborative frameworks that allow regularized access to those areas.

44. ***These CFM and CRM arrangements are participatory and collaborative by design, so that Batwa communities are directly involved in decision-making processes regarding resource use and management within PAs.*** By suggesting a waiver of participation fees³⁰ in CFM groups in Echuya for Batwa community members, the MWE (formerly NFA) also promotes the removal of financial barriers that previously hindered Batwa involvement, thereby facilitating greater inclusion and empowerment.

45. ***Through these arrangements, Batwa communities are able to access resources and derive tangible benefits from the PAs, such as sustainable harvesting and income-generating opportunities.*** The Project further supports Batwa communities by providing training and inputs for alternative livelihoods, helping to diversify their sources of income and improve their overall economic and social situation. Since the VMGPs began to be implemented in late 2023, 230 Batwa community members have benefitted from direct Project support through investments such as training in sewing, crafts making, and beekeeping (and required inputs); training in tour guiding; training in enterprise development, including mushroom and vegetable growing; and hands-on training in construction of fuel-efficient cook stoves.³¹ Also, 14 water tanks have been provided for rainwater harvesting systems.³² At the request and under leadership of the Batwa community members, an inventory of herbal medicine used by the Batwa was undertaken in the three national parks (Bwindi, Mgahinga, and Semuliki) (see also paragraph 72).

46. ***Management notes that the claims related to historical injustices against the Batwa people pre-date the Project by several decades, as referenced in the Request itself.*** There is no indication that the Project has “replicated” or aggravated the cited adverse impacts stemming from the displacement of the Batwa that was carried out between the 1960s and the early 1990s. Moreover, the Project does not support any activities that could affect the Batwa’s claim to such areas, which is currently being adjudicated in the national courts. Most Batwa CSO representatives

²⁸ It should be noted that the benefit-sharing schemes predate the Project and are not related to it; they were developed earlier with the support of other development partners (USAID, Netherlands). The revenue-sharing scheme of UWA is governed by national law. While these schemes are discussed in the VMGPs, the Project does not include any commitments to address them.

²⁹ CFM agreements for Echuya were negotiated by NFA with support from another development partner.

³⁰ Such fees are collected and used by the user groups themselves, not by NFA.

³¹ 50 beneficiaries around Bwindi, 62 around Echuya, 68 around Mgahinga, and 50 around Semuliki.

³² 10 around Bwindi, 1 around Mgahinga, and 3 around Semuliki.

have acknowledged during consultations that this legacy issue is outside of the remit of the Project, and that they appreciate the involvement of the Bank.

47. ***Contrary to the allegations of exclusion, the Project has systematically included Batwa communities in the Project area through meaningful consultations and by making Project benefits accessible to them, in line with ESS7. Hence, it is not clear what harm the Project would have caused to any such communities.***

48. Project activities take place in four PAs, subject to this Request for Inspection, close to which Batwa communities live:

- Bwindi Impenetrable National Park (Bwindi);
- Mgahinga Gorilla National Park (Mgahinga);
- Semuliki National Park (Semuliki) – all three of which are managed by UWA; and
- Echuya CFR (Echuya) – currently managed by MWE (until August 2025, managed by NFA).

49. In all of these PAs, a series of dedicated consultations with the Batwa communities and their representatives, in line with ESS7, have been carried out over the years, during both Project preparation and implementation. These consultations have been guided by the specific communication needs and consultation plan described in the SEP, the VMGF, and VMGPs, per ESS7, as further explained below. See also paragraphs 56-61 on meaningful consultations.

50. The Project developed a VMGF that was adopted and disclosed on March 18, 2020, as part of Project preparation. The validation consultations on the VMGF conducted in February 2020 included 254 Batwa community members (94 male and 160 female). The VMGF formed the basis for development of four site-specific VMGPs, one for each of the PAs that have Batwa communities living adjacent to them. Several rounds of consultations with Batwa-led organizations, Batwa communities, and CSOs and nongovernmental organizations (NGOs) working on Batwa issues have been conducted from 2019 to date. These included consultations to inform the development of the ESMF and VMGF during Project preparation, as well as for the development of the four VMGPs during Project implementation. The first set of VMGP consultations (2021-2022) included 467 Batwa and 87 partners. The original VMGPs were finalized in March 2023, adopted and disclosed in April 2023, and have since been under implementation.

51. The VMGPs currently being implemented are being updated following additional consultations with the Batwa and their representatives between April and October 2025. These consultations have involved 300 Batwa community members in the areas of Bwindi, Echuya, Mgahinga and Semuliki. Following these consultations, there will be further consultation and validation workshops in December 2025 in all four targeted PAs subject to this Request for Inspection with the Batwa communities and CSOs working with them to help ensure that there is a two-way stakeholder engagement process that informs, in a meaningful way, the finalization of the updates to the four VMGPs and their implementation, while at the same time providing the

Batwa communities with feedback on what can be addressed and taken on board under the Project until the closing date.

52. Under the second Project restructuring both UWA and MWE (previously NFA) have requested to re-allocate some of the original IDA financing to further scale up livelihood activities benefitting Batwa communities. The ongoing consultations with Batwa communities on updating of the VMGPs are relevant to inform these future interventions. This is also an opportunity to take stock and incorporate additional feedback from Batwa communities and see how that can be taken into account during the remainder of the implementation period, as part of adaptive management.

53. ***Management acknowledges the Batwa’s grievances regarding their displacement from lands they have historically inhabited. However, these displacements long predate the Project and were not caused by it.*** The Batwa communities living in the vicinity of Bwindi, Mgahinga, and Echuya have not resided within the boundaries of these targeted PAs since their involuntary resettlement before the early 1990s, as stated in the Request for Inspection (Batwa communities that live near Semuliki originally mostly came from the Democratic Republic of Congo in the 1970s and lived within the boundaries of the PA until the 1990s).³³ Further, such relocation from the four targeted PAs predates the Project by more than three decades and was initiated almost a hundred years ago with the gazettelement of several of these PAs in the 1930s.

54. ***Moreover, Batwa communities retain access to these four PAs for cultural practices and the sustainable harvesting of natural resources. The Project activities have supported the renewal and signing of additional CRM/CFM MoUs to promote the maintenance and increase of regularized access to PAs as established under national law.*** Infrastructure improvements supported by the Project—such as the reconstruction of a stone wall in Mgahinga—have not impeded Batwa communities’ physical access to forest resources, as the established access points remain open. The Project has also not restricted the existing, agreed or regularized terms of access, as noted earlier. In fact, Batwa communities continue not only to enjoy regularized access to natural resources within the PAs under existing regulations and new MoUs supported by the Project, but also benefit specifically from targeted livelihood support activities provided by the Project. None of these Project activities have, therefore, caused adverse impacts on the Batwa communities adjacent to these four targeted PAs, but have instead helped to improve their livelihoods.

55. Lastly, the Project also does not have any impact on any cultural heritage of Batwa communities. Instead, the Project sought to help preserve such heritage, at the request of Batwa communities and with their leadership, by supporting an inventory of indigenous medicinal plants for Bwindi, Mgahinga, and Semuliki (see paragraph 72 below).

Alleged exclusion from meaningful participation in Project

56. ***Management confirms that the consultations undertaken with Batwa communities (represented by individuals and a variety of CSOs/NGOs, including the Requesters) meet Bank***

³³ Turk, Marcos S., “A Displaced People: Documenting the History and Displacement of the Batwa Tribe in Bundibugyo District, Uganda.” (2022). Independent Study Project (ISP) Collection. 3488. https://digitalcollections.sit.edu/isp_collection/3488

policy requirements and can be considered broad and meaningful. Management further confirms that Project benefits have been provided to the Batwa. Overall, Project consultations have reached about ten percent of the entire Batwa population in Uganda. There is no indication or evidence that Batwa were excluded from Project consultations and participation.

57. The Project has worked with Batwa CSOs as well as through the District Community Development Officers in respective districts to ensure that consultations are comprehensive and that the consultative process captures all Batwa stakeholders. During Project preparation, consultations were held with Batwa communities and various local partners. For example, consultations in 2020 to validate the VMGF included 254 Batwa community representatives (94 men and 160 women).³⁴ Project consultations with the Batwa communities held in 2021 (phase 1 of consultations on VMGPs) (under the COVID SOPs) included 77 persons; a second round of consultations and validation for the VMGPs took place in 2022 (phase 2 of consultations on VMGPs) (specifically with the Batwa communities) and included 390 persons. Additional consultations were undertaken in 2022 with other partners that work to benefit Batwa communities (various CSOs and NGOs, local government partners, etc., including representatives of 16 organizations, with an aim to include all main organizations working on Batwa issues). Consultations in 2022 were facilitated by different leaders of local Batwa-led CSOs. Phase 3 of consultations on VMGPs, related to their revision, were undertaken in July and October 2025, and included 300 Batwa community members.

58. The consultations are ongoing throughout Project implementation and are guided by the specific communication needs and consultation plan described in the Project's SEP prepared and adopted in October 2021 (and recently revised and updated by the Borrower to incorporate lessons learned during Project implementation, disclosed on November 4, 2025).

59. Management notes that the 2021 consultations were undertaken during the COVID pandemic and followed the World Bank's *Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings* and the Government's sanitary requirements (COVID SOPs). Since public gatherings were banned in Uganda at the time, the consultation process relied on methods such as: key informant interviews, one-on-one physical discussions, within the recommended COVID SOPs, focus group discussions of not more than five people organized within the framework of the SOPs, and virtual or telephone interviews with representatives of some of the Batwa.

60. There was also a deliberate effort to ensure that the focus group discussions were organized in open spaces to avoid gathering and crowding. The interviews were conducted in the local languages of Rukiga and Kifumbira/Kinyarwanda spoken by the Batwa living adjacent to the four targeted PAs. Once COVID restrictions were lifted (mid-2022), additional VMGP consultations were undertaken, including in-person consultations in June, September and October 2022. Further consultations with the Batwa communities during Project implementation have taken place during April, July and October 2025 to update the four VMGPs. More validation workshops with Batwa communities are planned for this calendar year to finalize the remaining updates to the VMGPs.

³⁴ Link to the disclosed VMGF with consultation attendance records:
<https://documents1.worldbank.org/curated/en/690501584532276088/pdf/IP-SSAHUTLC-Planning-Framework-Uganda-Investing-in-Forests-and-Protected-Areas-for-Climate-Smart-Development-Project-P170466.pdf>

The Project has used local languages and/or interpretation during consultative meetings, provided translated summaries of the VMGF to facilitate the informed participation of Batwa communities, and engaged a national specialist with extensive knowledge of these communities for the preparation of the original VMGPs. The 2025 consultations related to the revision of VMGPs have been observed by the World Bank team, including an ESS7 expert.

61. ***Management wishes to emphasize that, consistent with ESS7, there were meaningful and frequent consultations that were culturally appropriate and inclusive with Batwa communities living adjacent to the four targeted PAs and that several benefits Batwa communities derive from the Project were specifically requested by them during these consultations.*** Further, Management notes that given the design of the Project, as well as the nature of the activities financed, Free, Prior, and Informed Consent (FPIC) as provided for under ESS7 was not required.³⁵ None of the activities caused relocation or had significant impacts on the Batwa’s cultural heritage and none involved adverse impacts on land and natural resources subject to traditional ownership or under customary use or occupation. Nevertheless, the Project design and implementation were participatory and provided extensive opportunities for Batwa communities to take part, including in Batwa-specific consultations and Project benefits. Batwa communities retain access to the four PAs subject to this Request for Inspection for cultural practices and the sustainable harvesting of natural resources. Infrastructure improvements supported by the Project—such as the reconstruction of a stone wall in Mgahinga—have not impeded Batwa communities’ physical access to forest resources, as the established access points remain open. The Batwa communities continue not only to enjoy regularized access to forest resources under existing regulations and new MoUs supported by the Project but also benefit specifically from targeted livelihood support activities provided by the Project as well as other activities, such as the participatory inventory of medicinal plants which was requested by and undertaken for the benefit of the Batwa.

Alleged “unauthorized representation” during consultations

62. ***The allegation that the Project allowed “unauthorized representation” misunderstands the broad consultation requirements of ESS7 and ESS10 and overlooks the diverse views and leadership structures of Batwa communities, which are not represented by a single leader or organization.*** The Request consistently misrepresents the purpose of the Project-related consultations, which are intended to give stakeholders an opportunity to express their views on the Project. The Request also suggests that these consultations failed to provide legitimate political representation of the Batwa, even though achieving such representation was neither intended nor required for the Project.

63. ***Management is aware of disagreements between various groups within the Batwa community and the challenges resulting from competing leadership claims. These predate the Project, however, and the Project is not the cause of such disagreements.*** Management also notes

³⁵ Per paragraph 24 of ESS7, since the activities of the Project do not (a) have adverse impacts on land and natural resources subject to traditional ownership or under customary use or occupation; (b) cause relocation of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (IPs/SSAHUTLCs) from land and natural resources subject to traditional ownership or under customary use or occupation; or (c) have significant impacts on cultural heritage that is material to the identity and/or cultural, ceremonial, or spiritual aspects of the lives of affected IPs/SSAHUTLCs.

that no single entity or organization represents all Batwa communities or organizations in the Project areas. While the Request claims there has been “unauthorized” representation, it fails to specify which representative or organization it considers “authorized” to speak on behalf of (all or some) Batwa communities.

64. ***The Batwa are a diverse group of ca. 4,000 individuals³⁶ living in Uganda with no single leader or joint representation.*** The majority of them live in communities adjacent to the four PAs. Their representation varies depending on their location. The Batwa do not have a single leader or organization that is recognized to represent them in their entirety as an ethnic group. The Batwa community in Bundibugyo district on the outskirts of Semuliki National Park have a king (King Nziito Geofrey). This group migrated in the 1970s from the Democratic Republic of Congo. However, this king is not recognized outside their group. There is no universally recognized “Batwa King” or leader for all Batwa people, as leadership varies by community.³⁷

65. Numerous NGOs and CSOs (both Batwa-led and non-Batwa led) and church-based organizations exist that play some role in supporting Batwa communities.³⁸ Some NGOs appear to be focused on addressing historic injustices, while others are concerned with economic and social empowerment of Batwa communities in the present. The alleged exclusion of Batwa from the Project has not been raised by Batwa community members during consultations or through the Project GM. The Requesters raised this allegation in a letter sent to MWE in October 2024, and later to the Bank.

66. ***Based on the Requesters’ desire for the Project to address historic injustices, they appear to conflate Project-related consultations with formally mandated political representation of the Batwa.*** It is in that context that they appear to view themselves as the sole legitimate representatives. This is consistent with representations they made earlier to the Bank, according to which “any Batwa consultations conducted without [their] participation are invalid.” This ongoing dispute about “legitimate representation” of Batwa spilled over into the Project, when the Requesters earlier demanded that the Project stop engaging with other CSOs working on Batwa issues, which they viewed as “unauthorized” stakeholders. However, stakeholder engagement carried out by the Borrower under the Project has complied with ESS7 and ESS10 requirements, as described in detail in Annex 1. These standards require Borrowers to hold broad and inclusive consultations. Excluding groups of legitimate stakeholders at the request of other Project stakeholders is not consistent with Bank policy requirements and consequently was not considered.

67. ***Tensions regarding the question of legitimacy of representation could be observed in meetings that the Project team convened with various CSOs/NGOs working on Batwa issues.*** The main conflict over representation seems to stem from some Batwa-led organizations not recognizing the legitimacy and value of the Government and the Bank engaging organizations for the Project that are not Batwa-led. The Bank, however, cannot be the arbiter of these disputes. The

³⁶ Republic of Uganda: National Population and Housing Census 2024.

³⁷ *Fauna & Flora International. Batwa Cultural Values in Bwindi Impenetrable and Mgahinga Gorilla National Parks, Uganda: A Report of a Cultural Assessment. Cambridge: Fauna & Flora Int’l, 2013, 51; Marcos S. Turk, “A Displaced People: Documenting the History and Displacement of the Batwa Tribe in Bundibugyo District, Uganda” (Independent Study Project [ISP] Collection 3488, 2022).*

³⁸ Kidd, Christopher (2008) *Development Discourse and the Batwa of South West Uganda: Representing the ‘Other’: Presenting the ‘self.’* Available at <https://theses.gla.ac.uk/169/>

Bank has advised government counterparts to pursue continued engagement that is as broad and inclusive as necessary to include all relevant stakeholders, either identifying as Batwa or seeking to support the Batwa. The Bank and Project officials remain open to dialogue with all Batwa stakeholders – as expressed in all engagements and communications to date.

68. ***The Project has made significant efforts to ensure that all Batwa communities, as well as CSO/NGO groups that are Batwa-led or work with Batwa issues, are included and consulted,*** as detailed in Annex 1. The invitations to consultations are issued by the local District Community Development Officers—who are knowledgeable about the local stakeholders—in addition to the stakeholder invitations issued by the implementing agencies directly. This provides for a broad coverage of those invited to participate in the consultations. The list of stakeholders for consultations is also cross-checked with other entities working on the ground to see whether additional stakeholders should be added. The Project seeks to ensure that consultations are conducted with all parties that recognize themselves as Batwa without prejudice to any group, in line with ESS7 and ESS10, to ensure that the consultations are inclusive.

Co-management and sharing of revenues generated from tourism and alleged exclusion from receiving revenues that tourism activities generate

69. ***The Request takes issue with some government schemes for tourism revenue-sharing that are separate from and unrelated to the Project.*** The Project did not develop or support the tourist products co-managed by UWA and local Batwa groups under the existing benefit-sharing schemes. Nor does the Project support or rely on UWA’s tourism revenue-sharing scheme. It is therefore incorrect to allege that the exclusionary features of these schemes, if any, are attributable to the Project.³⁹

70. ***The Project does not provide support to the so-called “Batwa trail” in Mgahinga or the “Batwa experience” in Bwindi, which are co-managed by UWA and local Batwa groups and include demonstration of Batwa cultural practices by the Batwa tour guides for tourists.*** These two tourism products predate the Project and were originally supported by donor financing from the United States Agency for International Development (USAID) and the Batwa Development Program (a non-Batwa-led support NGO) and have their own governance and revenue-sharing arrangements unrelated to the Project. The Project also does not provide support to the Batwa trail in Semuliki, which is a tourism product recently launched and co-managed by UWA and the local Batwa community. In Echuya, the Project supported a local guides group, which includes Batwa members, in response to their request for support to rehabilitate an existing trail that they operate in collaboration with NFA. The activity involved trail clearance and signage installation and provided employment for 15 people, including 10 Batwa.

³⁹ None of the supported tourism activities commercialize the culture and knowledge of the Batwa. Tourism investments in the four PAs subject to this Request for Inspection that are under consideration or implementation include the following: construction of visitor information centers in Semuliki and in Echuya; construction of new gate structures in Mgahinga, Bwindi (North) and Semuliki; upgrade of community ecotourism sites for use of community tourism guides; construction of a picnic site at a waterfall inside Bwindi (North); three peak volcano trails in Mgahinga; and construction of a bird hide (for bird watching).

Alleged disregard of Batwa traditional forest knowledge and cultural practices

71. ***Batwa communities within the Project area have been specifically targeted through outreach and inclusion measures, as well as dedicated Project interventions.*** These efforts have helped identify the priorities expressed by Batwa communities, which have been included in the VMGPs to the extent they can be addressed within the scope of the Project. It is therefore incorrect to allege that the Project disregarded the Batwa's traditional knowledge.

72. ***The VMGPs illustrate the inclusion of Batwa traditional forest knowledge and cultural practices.*** During the consultations on the VMGPs, Batwa communities had requested that an inventory of indigenous medicinal plants be prepared. The inventory was completed in 2025 for Bwindi, Mgahinga, and Semuliki under Batwa leadership with the support of the Project. Procurement of translation and printing services for the completed inventory is currently underway. This includes translation into local languages and printing to provide copies to the various Batwa groups engaged in tourism (the translation and printing costs are budgeted for under the Project). This inventory document includes explicit language clarifying that the undertaking was carried out by the Batwa communities living close to these three PAs and is intended for their exclusive use. In addition, and following feedback received from the Batwa community members during the consultations in July 2025 for the update of the Mgahinga VMGP, the Project proposes to support establishment of a demonstration plot for medicinal plants for the Batwa community group inside the park boundary (this is subject to validation of the revised VMGP in December 2025).

73. ***However, some of the requests for activities supported through the VMGP clearly exceeded the Project's scope and objective and could not be accommodated.*** This is the case, for example, for requests:

- to have land purchased and granted to Batwa communities by the Project;
- to support renegotiation of existing revenue-sharing schemes/benefit-sharing schemes between local government, UWA and Batwa communities;
- to allow Batwa-led CSOs to receive single-source contracts to carry out some of the activities that the Project procured.

The fact that such requests, which exceed the Project objective and scope, or were inconsistent with the Bank's procurement regulations, could not be accommodated, cannot be qualified as "disregarding Batwa knowledge." Nor, in Management's view, does it represent harm, as such aspirations constitute unfulfilled expectations.

Alleged exploitation of Batwa culture

74. ***The Project does not entail or support the use of Batwa cultural heritage for commercial purposes by non-Batwa. None of the activities cited in the Request ("...Batwa individuals to perform our cultural practices for tourists...") are supported by or related to the Project.***

75. ***The Project does not support interventions that commercially develop Batwa knowledge or culture for the benefit of non-Batwa.*** As part of the consultations on the VMGPs, Batwa communities had requested support for developing an inventory of indigenous medicinal plants (see paragraph 72). This inventory was done by the Batwa with support from UWA for their sole use and is neither sold nor otherwise marketed by the Project for commercial purposes.

76. ***The Request also refers to government schemes for tourism revenue-sharing that are separate from and entirely unrelated to the Project.*** The Project is not associated with the revenue-sharing schemes that exist for park fees or gorilla permits⁴⁰ or the percentage of such revenues that is shared by UWA with park-adjacent communities.⁴¹ It is therefore incorrect that the Project would be responsible for an allegedly unfair distribution of such revenues between government bodies and local communities, including Batwa communities.

77. The Project does not provide support to the so-called “Batwa trail/Batwa experience,” which are tourism products launched and co-managed by UWA. As explained in paragraph 70 above, the Project’s support for a local guides group in Echuya to rehabilitate their own trail is distinct from these tourism products, as it was offered at the request of the local guides (including the Batwa) and was implemented with their involvement.

Alleged reprisals and intimidation

78. The Bank does not tolerate reprisals or retaliation, including against anyone who shares their views about Bank-financed projects, research, activities, and their impact. The Bank considers any form of intimidation or threat against project-affected people (or other stakeholders) to be contrary to its values of integrity, stakeholder engagement, and accountability.

79. The Bank and Project counterparts have sought to engage with the Requesters on a regular basis. The Requesters had submitted a complaint to the Bank in November 2024 which prompted an extensive engagement with them.⁴² During this process, no concerns about intimidation or retaliation have been raised with the Bank. The first time the Bank was informed of such concerns was in a letter from the Requesters dated July 14, 2025, which included allegations of intimidation and reprisals, though without providing further details. The Bank made inquiries on August 7 and August 15, 2025, to discuss these concerns, including a proposal for an in-person meeting in their area. On August 15, 2025, however, the Requesters responded by email that they did not wish to be further contacted by the Bank.

80. The Bank then brought to the attention of senior government officials that the Requesters had raised concerns about reprisals and it asked that all parties involved in Project implementation be reminded of the fact that the Bank does not tolerate any form of retaliation in the projects it supports. This message was also conveyed in various technical meetings with counterpart staff

⁴⁰ *Gorilla permits* are official entry permits required to trek to and observe mountain gorillas in their natural habitat. These permits are issued by UWA and are a critical part of Uganda’s conservation framework.

⁴¹ Revenue sharing is implemented through the financing of local community development proposals, funded from a portion of the revenues (<https://ugandawildlife.org/revenue-sharing/>).

⁴² The team met with the complainants both in person: on January 28, 2025; April 22, 2025; July 11, 2025 and virtually: on November 26, 2024; January 23, 2025; February 20, 2025; and August 21, 2025.

over the past four months. Since the Requesters had declined to share further details or individuals involved, no specific actions could be requested by the Bank.

81. On October 2, 2025, the Bank received further messages from one of the Requesters alleging continued intimidation. In these messages two audio recordings were attached as evidence. Both audios were carefully studied; they contained recordings of two undated conversations. One was found to reflect tensions between the heads of different Batwa-led CSOs, rather than threats or intimidation by government officials. The other one included a monologue by an unidentified individual containing no discernible threats. On October 7, 2025, the Bank team requested again to meet with the Requesters to better understand these threats, but the Requesters once more declined and explained that they are seeking legal recourse instead.

82. At the request of the Bank, MWE, as the Project coordinating ministry, sent a letter to all district Chief Administrative Officers in districts with Project activities on October 13, 2025, reiterating that all interactions and communications in the context of the Project should be carried out with a respectful approach, as the World Bank does not tolerate reprisals or intimidation.

83. The Bank repeatedly offered to engage with the Government regarding specific allegations of intimidation and reprisals, with the aim of enabling appropriate review and targeted action. However, the Requesters did not provide information identifying specific incidents, nor did they agree to meet with the Bank team to clarify the nature of their claims. The Bank will continue to reiterate its earlier broader message to the Government, emphasizing the importance of reminding all parties involved in project implementation, as well as local authorities, of the Bank's requirement that stakeholders and complainants must not be subjected to reprisals or intimidation.

Conclusion

84. ***Management believes that the Bank has correctly applied its policies and procedures applicable to the Project as well as 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 or adversely affected by the alleged failure of the Bank to implement its policies and procedures.***

ANNEX 1
CLAIMS AND RESPONSES

No.	Claim	Response
1.	<p>The IFPA-CD project is replicating and furthering historical injustices against the Batwa people. We were forcibly evicted from our ancestral forests in 1991 without compensation and have no land of our own. This project represents a critical opportunity for co-management and benefit-sharing that could address decades of marginalization - yet we are being systematically excluded from meaningful participation. The Project is adversely affecting Uganda’s Batwa communities living near four PAs: the Bwindi Impenetrable National Park, Mgahinga Gorilla National Park, Echuya Central Forest Reserve, and Semuliki National Park. Environmental and Social Standard 7 (ESS7) on Indigenous Peoples - specifically requirements for Free, Prior and Informed Consent (FPIC) and meaningful consultation with Indigenous communities has not been followed.</p>	<p>Historical exclusion/Allegations of Harm</p> <p><i>Management recognizes the difficult situation of the Batwa communities and acknowledges that they are among the most marginalized groups, having lost access to these four protected areas and their natural resources several decades ago, which affected their original traditional livelihoods of hunting and gathering. Most Batwa communities still live in extreme poverty and struggle to preserve their culture in a rapidly changing environment.</i></p> <p><i>However, Management disagrees that the Project “replicate[s] and further[s]” injustices against the Batwa people. On the contrary, the Project has successfully supported Batwa community livelihoods and their regularized access to natural resources in PAs.</i></p> <p><i>The Request does not explain or provide evidence of how and where the Project would cause the alleged harm to Batwa communities. Participation in the community activities under the Project is voluntary and no adverse impacts on Batwa communities would result from their decision to participate, or not participate, in the Project. Project activities that support the livelihoods of communities around PAs target park-adjacent communities, including Batwa communities.</i></p> <p><i>Some of the main allegations in the Request represent unfulfilled expectation from the Project, rather than identify harm caused by it. The expectation that the Project would rectify past developments and injustices is central to the Request. In the Requesters’ view and their own words, the “project represents a critical opportunity for co-management and benefit-sharing that could address decades of marginalization.” Management notes that while the Project does indeed contribute to addressing Batwa marginalization through livelihood development, addressing “decades of marginalization” exceeds the scope of the Project. Moreover, failure to achieve such aspirations would not represent harm caused by the Project.</i></p> <p><i>The Project provides support for maintaining and expanding the Batwa communities’ regularized access to PAs rather than restricting such access. Importantly, the Project has supported the renewal and signing of additional CRM/CFM MoUs, including in Bwindi, Mgahinga and Semuliki, to maintain and expand regularized access to PAs as established under national law. The Project has actively promoted increased Batwa participation in CFM and CRM arrangements and, notably, it has helped the Batwa to have representation in some Resource Use Group Committees. Hence, the Project has sought to reduce the pre-existing access</i></p>

No.	Claim	Response
		<p><i>restrictions that were introduced with the historic gazettement and displacements in the 1990s, and maintain collaborative frameworks that allow regularized access to those areas.</i></p> <p><i>These CFM and CRM arrangements are participatory and collaborative by design so that Batwa communities are directly involved in decision-making processes regarding resource use and management within PAs. By suggesting a waiver of participation fees in CFM groups in Echuya for Batwa community members, the Project also promotes the removal of financial barriers that previously hindered Batwa involvement, thereby facilitating greater inclusion and empowerment.</i></p> <p><i>Through these arrangements, Batwa communities are able to access resources and derive tangible benefits from the PAs, such as sustainable harvesting, cultural activities, and income-generating opportunities. The Project further supports Batwa communities by providing training and inputs for alternative livelihoods, helping to diversify their sources of income and improve their overall economic and social situation.</i></p> <p><i>Management notes that the claims related to historical injustices against the Batwa people pre-date the Project by several decades, as referenced in the Request itself.</i> There is no indication that the Project has “replicated” or aggravated the cited adverse impacts stemming from the displacement of the Batwa that was carried out between the 1960s and the early 1990s. Moreover, the Project does not support any activities that could affect the Batwa’s claim to such areas, which is currently being adjudicated in the national courts. Most Batwa CSO representatives have acknowledged during consultations that this legacy issue is outside of the remit of the Project and that they appreciate the involvement of the Bank.</p> <p>Inclusion and Benefits</p> <p><i>Contrary to the allegations of exclusion, the Project has systematically included Batwa communities in the Project area through meaningful consultations and by making Project benefits accessible to them, in line with ESS7. Hence, it is not clear, based on current evidence, what harm the Project would have caused to any such communities.</i></p> <p>Project activities take place in four PAs, close to which Batwa communities currently live: (i) Bwindi Impenetrable National Park (Bwindi); (ii) Mgahinga Gorilla National Park (Mgahinga); (iii) Semuliki National Park (Semuliki) – all three of which are managed by UWA; and (iv) Echuya CFR (Echuya) – currently managed by MWE (until August 2025, managed by NFA). In all of these PAs, a series of dedicated consultations with the Batwa communities and their representatives, in line with ESS7, have been carried out over the years, during both Project preparation and implementation. These consultations have been guided by the specific communication needs</p>

No.	Claim	Response
		<p>and consultation plan described in the SEP and the documents developed for the Project, per ESS7, as described below.</p> <p>The Project developed a VMGF that was adopted and disclosed on March 18, 2020. The VMGF formed the basis for development of four site-specific VMGPs, one for each of the PAs that have Batwa communities living adjacent to them. Several rounds of consultations with Batwa-led organizations, Batwa communities, and CSOs and NGOs working on Batwa issues have been conducted from 2019 to date. These included consultations to inform the development of the ESMF and VMGF during Project preparation, as well as for the development of the four VMGPs during Project implementation. The original VMGPs were finalized in March 2023, adopted and disclosed in April 2023 and have since been under implementation.</p> <p>The consultation plan is described in the Project’s Stakeholder Engagement Framework (SEF) that was adopted and disclosed on January 27, 2020 as well as further detailed in the specific SEP prepared and adopted in October 2021 (and recently revised by the Borrower to incorporate lessons learned during Project implementation and enhancements made to the Project GM and disclosed on November 4, 2025).</p> <p>Management notes that the 2021 consultations were undertaken during the COVID pandemic and followed the World Bank’s Technical Note: <i>Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings</i> and the Government’s sanitary requirements (COVID SOPs). Since public gatherings were banned in Uganda at the time, the consultation process relied on methods such as: key informant interviews, one-on-one physical discussions, within the recommended SOPs, focus group discussions of not more than five people organized within the framework of the COVID SOPs, and virtual or telephone interviews with representatives of some of the Batwa. There was also a deliberate effort to ensure that the focus group discussions were organized in open spaces to avoid gathering and crowding. The interviews were conducted in the local languages of Rukiga and Kifumbira/Kinyarwanda spoken by the Batwa living adjacent to the four targeted PAs. Once COVID restrictions were lifted (mid-2022), additional VMGP consultations were undertaken, including in-person consultations in June, September and October 2022.</p> <p>The VMGPs currently being implemented are being updated following additional consultations with the Batwa and their representatives between April and October 2025. These consultations have involved 300 Batwa community members in the areas of Bwindi, Echuya, Mgahinga, and Semuliki. Following these consultations, further consultation and validation workshops have been scheduled for December 2025 in all four targeted PAs with the Batwa communities and CSOs working with them to help ensure that there is a two-way stakeholder engagement process that informs, in a meaningful way, the</p>

No.	Claim	Response
		<p>finalization of the updates to the four VMGPs and their implementation, while at the same time providing Batwa communities with feedback on what can be addressed and taken on board under the Project until the closing date.</p> <p>Under the second Project restructuring, both UWA and MWE (previously NFA) have re-allocated some of the original IDA financing to further scale up livelihood activities benefiting Batwa communities. The ongoing consultations with Batwa communities on updating of the VMGPs are relevant to inform these future interventions. This is also an opportunity to take stock and incorporate additional feedback from Batwa communities and see how that can be taken into account during the remainder of the implementation period, as part of adaptive management.</p> <p>The Batwa claim they have been removed and progressively alienated over nearly a century from their ancestral lands by the government without compensation. They filed a petition for redress against the Attorney General, UWA, and NFA with the Constitutional Court of Uganda in 2013. On August 19, 2021, the Constitutional Court delivered its decision recognizing that the Batwa ancestors had inhabited and held interest in the lands before displacement, and that no adequate compensation had ever been paid. The Court declined to decide on restitution of ownership or other broad remedies sought by the Petitioners (such as recognition under international law), although it found that affirmative action measures were constitutionally mandated. Following the Constitutional Court's judgement the Attorney General filed an appeal with the Supreme Court, contesting the Constitutional Court's findings. The Supreme Court has not yet delivered its decision on the appeal.</p> <p>Consultations: The Project has worked with Batwa CSOs as well as through the District Community Development Officers in respective districts to ensure that consultations are comprehensive and that the consultative process captures all Batwa stakeholders. During Project preparation, consultations were held with Batwa communities and various local partners. For example, consultations in 2020 to validate the VMGF included 254 Batwa community representatives (94 men and 160 women). Project consultations with the Batwa communities held in 2021 (phase 1 of consultations on VMGPs) (under the COVID SOPs) included 77 persons; a second round of consultations and validation for the VMGPs took place in 2022 (phase 2 of consultations on VMGPs) (specifically with the Batwa communities) and included 390 persons. As such, consultations with Batwa communities for the development of the VMGPs between 2021 and 2022 included a total number of 467 persons, approx. ten percent of the entire Batwa population in Uganda. Additional consultations were undertaken in 2022 with other partners that work to benefit Batwa communities (various CSOs and NGOs, local government partners, etc.). Consultations related to VMGP revisions also included organizations working with Batwa communities, including representatives of 16 organizations, with an aim to include all</p>

No.	Claim	Response																
		<p>main organizations working on Batwa issues. See table below – organizations highlighted in bold are part of the original complaint made to the World Bank’s Grievance Redress Service (GRS) on November 18, 2024. Consultations in 2022 were facilitated by different leaders of local Batwa-led CSOs.</p> <p>CSO/NGO Partners Engaged in Project Consultations</p> <table border="1" data-bbox="646 478 1481 1875"> <thead> <tr> <th data-bbox="646 478 1019 520"><i>CSO/NGO Consultations</i></th> <th data-bbox="1019 478 1481 520"><i>Stakeholders in Attendance</i></th> </tr> </thead> <tbody> <tr> <td data-bbox="646 520 1019 722"><i>Bwindi (Buhoma), June 2022</i></td> <td data-bbox="1019 520 1481 722">Action for Batwa Empowerment Group, Batwa Empowerment Village, Batwa Development Program, Batwa Development Organization, Pro-Biodiversity Conservationists in Uganda (PROBICOU)*</td> </tr> <tr> <td data-bbox="646 722 1019 863"><i>Bwindi (Rushaga), June 2022</i></td> <td data-bbox="1019 722 1481 863">Batwa Indigenous Development Organization, Nkuringo Cultural Center, Batwa Development Organization</td> </tr> <tr> <td data-bbox="646 863 1019 1003"><i>Echuya, Sept 2022</i></td> <td data-bbox="1019 863 1481 1003">Nature Uganda, Bwindi Mgahinga Conservation Trust, Nkuringo Cultural Center, Batwa Development Organization</td> </tr> <tr> <td data-bbox="646 1003 1019 1262"><i>Mgahinga, Sept 2022</i></td> <td data-bbox="1019 1003 1481 1262">Nkuringo Cultural Center, Batwa Indigenous Organization, Mga hinga Tourism Association, United Organization for Batwa Development in Uganda, Bwindi Mgahinga Conservation Trust, Batwa Development Organization, BFO Initiative</td> </tr> <tr> <td data-bbox="646 1262 1019 1371"><i>Semuliki, Oct 2022</i></td> <td data-bbox="1019 1262 1481 1371">Cross Cultural Foundation of Uganda, Wildlife Conservation Society, Children Foundation</td> </tr> <tr> <td data-bbox="646 1371 1019 1696"><i>Bwindi/Echuya/Mgahinga (separate meetings), Jan 2025</i></td> <td data-bbox="1019 1371 1481 1696">Nkuringo Conservation Development Foundation, BioVision Africa, Self Help Africa, The Gorilla Organization, Bwindi Mgahinga Conservation Trust, United Organization for Batwa Development in Uganda, Batwa Indigenous Development Organization, Batwa Development Organization, Batwa Indigenous Empowerment Organization</td> </tr> <tr> <td data-bbox="646 1696 1019 1875"><i>Kisoro District, three meetings, April 2025</i></td> <td data-bbox="1019 1696 1481 1875">Batwa Indigenous Empowerment Organization, Batwa Development Organization, Batwa Indigenous Development Organization, United Organization for Batwa Development in Uganda, Nkuringo Community</td> </tr> </tbody> </table>	<i>CSO/NGO Consultations</i>	<i>Stakeholders in Attendance</i>	<i>Bwindi (Buhoma), June 2022</i>	Action for Batwa Empowerment Group, Batwa Empowerment Village, Batwa Development Program, Batwa Development Organization , Pro-Biodiversity Conservationists in Uganda (PROBICOU)*	<i>Bwindi (Rushaga), June 2022</i>	Batwa Indigenous Development Organization , Nkuringo Cultural Center, Batwa Development Organization	<i>Echuya, Sept 2022</i>	Nature Uganda, Bwindi Mgahinga Conservation Trust, Nkuringo Cultural Center, Batwa Development Organization	<i>Mgahinga, Sept 2022</i>	Nkuringo Cultural Center, Batwa Indigenous Organization , Mga hinga Tourism Association, United Organization for Batwa Development in Uganda, Bwindi Mgahinga Conservation Trust, Batwa Development Organization , BFO Initiative	<i>Semuliki, Oct 2022</i>	Cross Cultural Foundation of Uganda, Wildlife Conservation Society, Children Foundation	<i>Bwindi/Echuya/Mgahinga (separate meetings), Jan 2025</i>	Nkuringo Conservation Development Foundation, BioVision Africa, Self Help Africa, The Gorilla Organization, Bwindi Mgahinga Conservation Trust, United Organization for Batwa Development in Uganda, Batwa Indigenous Development Organization , Batwa Development Organization , Batwa Indigenous Empowerment Organization	<i>Kisoro District, three meetings, April 2025</i>	Batwa Indigenous Empowerment Organization , Batwa Development Organization , Batwa Indigenous Development Organization , United Organization for Batwa Development in Uganda, Nkuringo Community
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No.	Claim	Response
		<p>Validation consultations have been scheduled in the communities and with partners involved in the July 2025 consultations, set to take place between December 8 and December 18, 2025.⁴⁴</p> <p><i>Direct Project Benefits for Batwa communities</i></p> <p><i>Management wishes to emphasize that, consistent with ESS7, there were meaningful and frequent consultations that were culturally appropriate and inclusive with Batwa communities living adjacent to the four targeted PAs and that several benefits Batwa communities derive from the Project were specifically requested by them during these consultations. Further, Management notes that none of the activities of the Project require the application of FPIC, per paragraph 24 or 30 of ESS7,</i> since, as detailed below, the activities of the Project do not (i) have adverse impacts on land and natural resources subject to traditional ownership or under customary use or occupation; (ii) cause relocation of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (IPs/SSAHUTLCs) from land and natural resources subject to traditional ownership or under customary use or occupation (the Batwa completely lost access to the four protected areas and their natural resources over thirty years ago and, since then, access these areas and their natural resources in a limited and regularized manner via CRM/CFM arrangements or upon request on an ad hoc basis, in accordance and by virtue of national law); or (iii) have significant impacts on cultural heritage that is material to the identity and/or cultural, ceremonial, or spiritual aspects of the lives of affected IPs/SSAHUTLCs. Nevertheless, as explained above/below, the Project design and implementation were participatory and provided extensive opportunities for Batwa communities to take part in Batwa-specific consultations and Project benefits. The Project relies on collaborative co-management approaches to these areas, which allows for regularized, albeit limited, access to these areas under national law.</p> <p>Management acknowledges the Batwa’s grievances regarding their displacement from lands they have historically inhabited. However, these displacements long predate the Project and were not caused by it. The Batwa communities living in the vicinity of Bwindi, Mgahinga, and Echuya have not resided within the boundaries of these targeted PAs since their relocation prior to the early 1990s, as stated in the Request for Inspection (Batwa communities that live near Semuliki originally mostly came from the Democratic Republic of Congo in the 1970s and lived within the boundaries of the PA until the 1990s). Further, such relocation from the four targeted PAs predates the Project by more than three decades and was initiated almost a hundred years ago with the gazettement of several of these PAs in the 1930s.</p> <p>Moreover, Batwa communities retain access to these four PAs for cultural practices and the sustainable harvesting of natural resources. The Project activities have supported the renewal and signing of</p>

⁴⁴ BIDO have responded to the invitation, reiterating their position of not wishing to engage under the Project.

No.	Claim	Response
		<p>additional CRM/CFM MoUs to promote the maintenance and increase of regularized access to PAs as established under national law. Infrastructure improvements supported by the Project—such as the reconstruction of a stone wall in Mgahinga—have not impeded Batwa communities’ physical access to forest resources, as the established access points remain open. The Project has also not restricted the existing, agreed or regularized terms of access, as noted earlier. In fact, Batwa communities continue not only to enjoy regularized access to forest resources under existing regulations and new MoUs supported by the Project, but also benefit specifically from targeted livelihood support activities provided by the Project. None of these Project activities have, therefore, caused adverse impacts on the Batwa communities adjacent to these four targeted PAs, but have instead helped to improve their livelihoods.</p> <p>Lastly, the Project also does not have any impact on any cultural heritage of Batwa communities. Instead, the Project sought to help preserve such heritage, at the request of Batwa communities and with their leadership, by supporting an inventory of indigenous medicinal plants for Bwindi, Mgahinga, and Semuliki, as detailed in Item 4.</p>
2.	<p>The project causes direct harm by:</p> <p>Perpetuating landlessness and exclusion: Without proper consultation, we are never allowed to come to the table to negotiate co-management arrangements or benefit-sharing that could provide sustainable livelihoods for our communities.</p>	<p><i>The Request does not present an explanation or evidence of how and where the Project would cause the alleged direct harm to Batwa communities. Participation in the community activities under the Project is voluntary: No adverse impacts on Batwa communities would result from their decision to participate, or not participate, in the Project.</i></p> <p><i>As noted in Item 1, in the absence of the Project, the situation of Batwa communities would not be better than with the Project. Key allegations in the Request represent the Requesters’ unfulfilled expectations from the Project, rather than actual harm caused by it.</i></p> <p><i>Management disagrees with the allegation that the Project would cause direct harm to Batwa communities by “perpetuating landless[ness] and exclusion.” As noted above, the Project neither caused nor required the cited evictions from these PAs, which took place between the 1960s and early 1990s. Moreover, the Project does not support any activities that could affect the Batwa’s claim to such areas, which is currently being adjudicated in the national courts.</i></p> <p><i>Many of the benefits and support being provided under the Project were requested by Batwa communities themselves during the consultations on the Project. Some of the requests for activities supported through the VMGP exceeded the Project’s scope and objective and could not be accommodated. This is the case, for example, for requests to: (i) have land purchased and granted to Batwa communities by the Project; (ii) support renegotiation of existing revenue-sharing schemes/benefit-sharing schemes between local government, UWA and Batwa communities; (iii) allow Batwa-</i></p>

No.	Claim	Response
		<p><i>led CSOs to receive single-source contracts to carry out some of the activities that the Project procured.</i></p> <p><i>The fact that such requests, which exceed the Project objective and scope, or were inconsistent with the Bank’s procurement regulations, could not be accommodated, cannot be qualified as “disregarding Batwa knowledge.” Nor, in Management’s view, does it represent harm, as such aspirations constitute unfulfilled expectations.</i></p> <p>The CFM and CRM are the established channels for providing benefits (and also regulating access to PAs) to all park-adjacent communities, including Batwa communities. CRM, under UWA, supports signing of MoUs with community groups for regularized access to resources found inside the PAs. This access is based on the resources identified in the General Management Plans (GMPs) of specific PAs and takes place in the “collaborative management”/resource use zones. In these zones, the management priority is to conserve the national park values through an integrated approach encompassing protection, education, restoration, and community conservation. Regulated harvesting of biophysical resources in a sustainable manner by community residents is allowed in agreed “collaborative management”/resource use areas but only through these negotiated MoUs. Collaborative management agreements clearly define the resources to be used, the resource user community for each agreement, and the agreed resource use area for that community, together with the agreed control and monitoring mechanisms. The zone is typically confined within a certain distance from the national park boundary where there are no tourism activities (2 km in Bwindi and Semuliki and 1 km in Mgahinga, which is a much smaller park). Resources typically accessed include firewood, grass (for roof thatching and crafts making), herbal medicine, bamboo (in Mgahinga), and fish (in Semuliki).</p> <p>Batwa access to PAs:</p> <p>Under UWA, the GMPs of the three PAs explicitly state that “access to cultural sites under agreed terms and conditions” is a permitted activity.</p> <ul style="list-style-type: none"> • Semuliki National Park GMP 2017/2018–2026/2027: page 32 • Bwindi Impenetrable National Park GMP 2014–2024 (extended to 2025): page 21 • Mgahinga Gorilla National Park GMP 2014–2024 (extended to 2025): page 15 <p>Under NFA (now MWE), the Forest Management Plan of Echuya CFR for the period July 1, 2016 –June 30, 2026 notes that cultural sites of the Batwa exist within the forest. However, the management of access is delegated to the CFM agreements, which specify that it is the responsibility of NFA “to ensure that the cultural rights and forest-based livelihoods for Batwa provided for under the agreement are realized and respected” (page 3).</p>

No.	Claim	Response									
		<p>Under the CFM agreements in Echuya and the CRM agreements in Bwindi, the Batwa have more frequent access to certain forest resources (such as fuelwood) and exclusive access to specific ones—for example, in Bwindi, only the Batwa are permitted to collect “yam.” In Semuliki, the Batwa are allowed to collect firewood from the forest twice a week (under a verbal agreement with UWA), while other community members under the CRM agreements may do so only once a month.</p> <p>In Bwindi, Mgahinga, and Semuliki, to date the Project has supported (i) training for UWA staff on how to undertake situational analysis of resource access and negotiate CRM MoUs; (ii) review of one previously concluded but lapsed CRM MoU per PA; and (iii) conclusion of one new CRM MoU per PA (in Mgahinga, two previously lapsed MoUs were reviewed, and no new agreements were concluded). UWA staff in Semuliki and Mgahinga are undertaking engagements for establishment of additional MoUs, with Project funds covering the cost of consultations (meetings and operational costs).</p> <p><i>The Project supports regularized access to park resources for the adjacent communities, including Batwa communities.</i> The Batwa are members of the community groups that have established CRM arrangements with UWA with Project support, as shown in the table below.</p> <table border="1" data-bbox="646 995 1481 1873"> <thead> <tr> <th data-bbox="646 995 834 1073">Protected Area</th> <th data-bbox="834 995 1159 1073">Resource User Groups with Renewed MoUs</th> <th data-bbox="1159 995 1481 1073">Resource User Groups with New MoUs</th> </tr> </thead> <tbody> <tr> <td data-bbox="646 1073 834 1430">Bwindi Impenetrable National Park</td> <td data-bbox="834 1073 1159 1430"> The people of Buremba, Ngaara, Mpungu and Muramba parishes, Mpungu Sub-County, Kanungu District <i>Resources to be accessed:</i> <i>firewood, herbal medicine, basketry /craft materials</i> <i>92 group members</i> </td> <td data-bbox="1159 1073 1481 1430"> Muramba-Mpungu parishes Beekeeping Group; Mpungu Sub-County, Kanungu District <i>Resource to be accessed:</i> <i>Land allocation for placement of beehives along the park boundary</i> <i>20 group members at the time of MoU negotiation</i> </td> </tr> <tr> <td data-bbox="646 1430 834 1873">Mgahinga Gorilla National Park</td> <td data-bbox="834 1430 1159 1873"> Resource Use Committee of Gisozi Parish, Muramba Sub County, Kisoro District <i>Resources to be accessed:</i> <i>Firewood, herbal medicine, bamboo rhizomes</i> <i>34 group members, including 4 Batwa</i> Resource Use Committee of Gitenderi Parish, </td> <td data-bbox="1159 1430 1481 1873"> None (One MoU is under negotiation with a Batwa community of Nyakacece, which has approximately 60 members; the MoU is for placement of beehives inside the park boundary and also (following feedback received from the Batwa community members during the consultations for the VMGP updates and subject </td> </tr> </tbody> </table>	Protected Area	Resource User Groups with Renewed MoUs	Resource User Groups with New MoUs	Bwindi Impenetrable National Park	The people of Buremba, Ngaara, Mpungu and Muramba parishes, Mpungu Sub-County, Kanungu District <i>Resources to be accessed:</i> <i>firewood, herbal medicine, basketry /craft materials</i> <i>92 group members</i>	Muramba-Mpungu parishes Beekeeping Group; Mpungu Sub-County, Kanungu District <i>Resource to be accessed:</i> <i>Land allocation for placement of beehives along the park boundary</i> <i>20 group members at the time of MoU negotiation</i>	Mgahinga Gorilla National Park	Resource Use Committee of Gisozi Parish, Muramba Sub County, Kisoro District <i>Resources to be accessed:</i> <i>Firewood, herbal medicine, bamboo rhizomes</i> <i>34 group members, including 4 Batwa</i> Resource Use Committee of Gitenderi Parish,	None (One MoU is under negotiation with a Batwa community of Nyakacece, which has approximately 60 members; the MoU is for placement of beehives inside the park boundary and also (following feedback received from the Batwa community members during the consultations for the VMGP updates and subject
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No.	Claim	Response	
		<p>Nyarusiza Sub County, Kisoro District</p> <p>Resources to be accessed: <i>Firewood, herbal medicine, Bamboo rhizomes</i></p> <p>30 group members, including 4 Batwa</p>	<p>to the VMGP validation in December 2025) establishment of a demonstration plot for medicinal plants by the Batwa community group inside the park boundary)</p>
		<p>Semuliki National Park</p> <p>Burondo, Sempaya, Ntandi, Mpulya, Bundimasoli, Ntotoro, Nyasolo, Bugando</p> <p>Resources to be accessed: <i>Firewood, handcraft materials, and fish resources</i></p> <p>126 members of Batwa community</p>	<p>Balira Gawe Beekeeping Group, Nyansoro Parish, Ntotoro Sub County, Bundibugyo District</p> <p>Resource to be accessed: <i>Land allocation for placement of beehives along the park boundary</i></p> <p>16 group members at the time of MoU negotiation (No Batwa, as there are no Batwa communities in this area)</p>
<p>According to MWE (formerly NFA), CFM is defined as a mutually beneficial arrangement in which a forest user group and the responsible agency share roles, responsibilities, rights, and returns (benefits) in a forest reserve or part of it (National Forestry and Tree Planting Act 2003). Under the CFM arrangement, a local community group, registered as a Community Based Organization (CBO) by the local authorities, enters into an MoU with MWE for co-management of a specific part of the CFR.</p> <p>In Echuya CFR, there currently are four CFM agreements (these were negotiated and signed by NFA without Project support in 2022). These agreements were negotiated after the previous agreements ended in 2018; in total, they include 1,188 members (previous agreements covered 1,103 members) and provide co-management rights over 680 ha of the CFR. These groups include 101 Batwa. Typically, the CFM groups have an annual membership fee, but as part of the re-negotiation of agreements with NFA, it was proposed by NFA that the Batwa members could be exempted, which has helped increase Batwa participation. Each of these CFM groups has at least one Batwa representative on its CBO executive committee.</p>			

Group Name	Total membership 2019*	Total membership current.	Batwa membership 2019**	Batwa membership, current.	# of Batwa on exec. comm.
Murora Echuya Forest Conservation and Poverty Alleviation Association (MEFCPAA)	169	250	Less than 15	15	1 (of 9)
Bufundi Echuya Forest Conservation and Livelihood Improvement Association (BECLA)	625	625	Less than 15	60	2 (of 9)
Kanaba Community Development and Echuya Forest Conservation Association (KADECA)	166	183	Less than 15	18	6
Muko Echuya Forest Conservation and Development Association (MECDA)	146	130	15	8	2
Total	1,103	1,188	No more than 60	101	11

* Source: CFM review report. See text of CFM Agreements for BECLA, KADECA, MECDA, and MEFCPAA). ** Source: VMGP

Many non-timber forest resources covered by CFMs in Echuya can be accessed by adjacent communities, based on need, and for those resources with regularized extraction, Batwa communities have preferential treatment. So, for example, while other communities/users can collect fuel wood and ropes once a week, Batwa can collect them 3 days per week in Echuya.⁴⁵

The Project has provided training support to the four CFM groups on governance aspects, including gender, social equity (roles, responsibilities and rights), and on financial management.

ECOTA (Echuya Ecotourism Association) is a CFM umbrella group coordinating all the CFM groups and implementing ecotourism in Echuya. It has a MoU with MWE (formerly NFA) and two Batwa representatives are on its executive committee.

The Project has to date supported establishment of 19 CFM agreements in 13 different PAs managed by MWE (formerly NFA) (not including Echuya CFR), bringing 8,238.6 ha of land under co-management by community groups consisting of close to 11,400 members. This support has significantly scaled up co-management of PAs under MWE – by September 2025, close to 35,000 ha countrywide

No.	Claim	Response
		<p>were under CFM agreements. The above 19 CFM groups as well as CFM groups in Echuya have been provided by the Project with various inputs and training to support livelihoods that do not depend on extraction of forest resources (beekeeping, tree nurseries, sewing equipment, craft making, ecotourism, etc.)</p>
<p>3.</p>	<p>Destroying community unity: The Bank’s acceptance of unauthorized representation and failure to follow ESS7 is creating damaging divisions between Batwa leaders and settlements, weakening our collective voice when unity is essential for our survival.</p>	<p><i>The stakeholder engagement carried out by the Borrower under the Project has complied with ESS7 and ESS10 requirements. These standards require Borrowers to hold broad and inclusive consultations. Excluding groups of legitimate stakeholders at the request of other Project stakeholders is not consistent with Bank policy requirements.</i></p> <p><i>Management is aware of disagreements between various groups within the Batwa community and the challenges resulting from competing leadership claims. These predate the Project, however, and the Project is not the cause of such disagreements. Management also notes that no single entity or organization represents all Batwa communities or organizations in the Project areas. While the Request claims there has been “unauthorized” representation, it fails to specify which representative or organization it considers “authorized” to speak on behalf of (all or some) Batwa communities. Based on the Requesters’ desire for the Project to address historic injustices, they appear to conflate Project-related consultations with formally mandated political representation of the Batwa. It is in that context that they appear to view themselves as the sole legitimate representatives. This is consistent with representations they made earlier to the Bank.⁴⁶</i></p> <p>The Batwa are a diverse group of ca. 4,000 individuals living in Uganda. The majority of them live in communities adjacent to the four PAs. Their representation varies depending on their location. The Batwa do not have a single leader or organization that represents them in their entirety as an ethnic group. The Batwa community in Bundibugyo district on the outskirts of Semuliki National Park have a king (King Nziito Geoffrey). This group migrated in the 1970s from a protected area in the Democratic Republic of Congo. However, this king is not recognized outside their group. There is no universally recognized "Batwa King" or leader for all Batwa people, as leadership varies by community.</p> <p>Numerous NGOs, CSOs (both Batwa-led and non-Batwa led), and church-based organizations exist that play some role in supporting Batwa communities. Some CSOs/NGOs appear to be focused on addressing historic injustices, while others are concerned with economic and social empowerment of communities in the present.</p>

⁴⁵ See text of CFM Agreement in KADECA or BECLA.

⁴⁶ Two of the organizations have expressed in a letter to the Bank that “any future BATWA consultations conducted without [their] participation are invalid and do not constitute proper Indigenous consultation under ESS7.”

No.	Claim	Response
		<p>Tensions regarding the question of legitimacy of representation could be observed in meetings that the Project team convened with various CSOs/NGOs working on Batwa issues. The main conflict over representation seems to stem from some Batwa-led organizations not recognizing the legitimacy and value of the Government and the Bank engaging organizations for the Project that are not Batwa-led. The Bank, however, cannot be the arbiter of these disputes. The Bank has advised government counterparts to pursue continued engagement that is as broad and inclusive as necessary to include all relevant stakeholders, either identifying as Batwa or seeking to support the Batwa. The Bank and Project officials remain open to dialogue with all Batwa stakeholders – as expressed in all engagements and communications to date.</p> <p><i>The Project has made significant efforts to ensure that all Batwa communities, as well as CSO/NGO groups that are Batwa-led or work on Batwa issues, are included and consulted over the years, as listed in the table on stakeholder consultations with CSOs/NGOs above in Item 2.</i> The invitations to consultations are issued by the local district community development officers—who are knowledgeable about the local stakeholders—in addition to the stakeholder invitations issued by the implementing agencies directly. This provides for a broad coverage of those invited to participate in the consultations. The list of stakeholders for consultations is also cross-checked with other entities working on the ground to see whether additional stakeholders should be added. The Project seeks to ensure that consultations are conducted with all parties that recognize themselves as Batwa without prejudice to any group, in line with ESS7 and ESS10, to ensure that the consultations are inclusive.</p>
4.	<p>Wasting Indigenous knowledge: Our traditional forest knowledge and cultural practices could greatly benefit both conservation outcomes and tourism development, but the project ignores this invaluable resource by treating us as obstacles rather than partners.</p>	<p><i>Batwa communities within the Project area have been specifically targeted through outreach and inclusion measures, as well as dedicated Project interventions. These efforts have helped identify the priorities expressed by Batwa communities, which have been included in the VMGPs to the extent that they can be addressed within the scope of the Project.</i> It is therefore incorrect to allege that the Project would have disregarded the Batwa’s traditional knowledge.</p> <p><i>The Project does not support interventions that commercially develop Batwa knowledge or culture for the benefit of non-Batwa.</i> As part of the consultations on the VMGPs, Batwa communities requested support for developing an inventory of indigenous medicinal plants. The inventory was completed in 2025 under local Batwa leadership with the support of the Project. Procurement of translation and printing services for the completed inventory for Bwindi, Mgahinga, and Semuliki is currently underway. This includes translation into local languages and printing to provide copies to the various Batwa groups engaged in tourism. This inventory document includes explicit language that makes it clear that this undertaking was carried out by Batwa and is intended for their exclusive use.</p>

No.	Claim	Response
5.	<p>Legitimizing continued marginalization: By conducting “consultations” without proper Indigenous representation, the project provides legal cover for ongoing exclusion from our traditional territories and resources.</p>	<p>See Item 3 above.</p>
6.	<p>Threatening community safety: Our attempts to assert our rights have resulted in intimidation and safety concerns for our representatives.</p> <p>This project could transform Batwa livelihoods through genuine partnership, but instead it is entrenching our exclusion and replicating the same patterns that dispossessed us. Without immediate intervention, it will further cement our marginalization for generations.</p>	<p>See Items 2 above and 8 below regarding the Requesters’ expectations regarding the Project’s potential support for livelihoods of Batwa communities.</p> <p><i>The Bank does not tolerate reprisals or retaliation, including against anyone who shares their views about Bank-financed projects, research, activities, and their impact. The Bank considers any form of intimidation or threat against project-affected people (or other stakeholders) to be contrary to its values of integrity, stakeholder engagement, and accountability.</i></p> <p>The Bank and Project counterparts have sought to engage with Requesters on a regular basis. During this process, no concerns about intimidation or retaliation have been raised with the Bank. The first time the Bank was informed of such concerns was in a letter from the Requesters dated July 14, 2025, which included allegations of intimidation and reprisals, though without providing any further details. The Bank made inquiries on August 7 and August 15, 2025, to discuss these concerns, including a proposal for an in-person meeting in their area. On August 15, 2025, however, the Requesters responded by email that they did not wish to be further contacted by the Bank.</p> <p>The Bank then brought to the attention of the Government at the highest level that the Requesters had raised concerns about reprisals and it asked that all parties involved in Project implementation be reminded of the fact that the Bank does not tolerate any form of retaliation in the projects it supports. This message was also conveyed in various technical meetings with counterpart staff over the past four months. Since the Requesters had declined to share further details or individuals involved, no specific actions could be requested by the Bank.</p> <p>On October 2, 2025, the Bank received further messages from one of the Requesters alleging continued intimidation. In these messages two audio recordings were attached as evidence. Both of these were carefully studied. One was found to reflect tensions between the heads of different Batwa-led CSOs, rather than threats or intimidation by government officials. The other one included a monologue by an unidentified individual containing no discernible threats. On October 7, 2025, the Bank team requested again to meet with the Requesters to better understand these threats, but the Requesters once more declined and explained that they are seeking legal recourse instead.</p>

No.	Claim	Response
		<p>At the request of the Bank, MWE, as the Project coordinating ministry, sent a letter to all district Chief Administrative Officers in districts with Project activities on October 13, 2025, reiterating that all interactions and communications in the context of the Project should be carried out with a respectful approach, as the World Bank does not tolerate reprisals or intimidation.</p> <p><i>The Bank repeatedly offered to engage with the Government regarding specific allegations of intimidation and reprisals, with the aim of enabling appropriate review and targeted action.</i> However, the Requesters did not provide information identifying specific incidents, nor did they agree to meet with the Bank team to clarify the nature of their claims. The Bank will continue to reiterate its earlier broader message to the government, emphasizing the importance of reminding all parties involved in project implementation, as well as local authorities, of the Bank’s requirement that stakeholders and complainants must not be subjected to reprisals or intimidation.</p>
7.	<p>Cultural exploitation and forced assimilation: The project funds tourism initiatives that exploit Batwa culture while excluding us from revenue-sharing. They position select Batwa individuals to perform our cultural practices for tourists while Uganda Wildlife Authority and non-Indigenous (Bakyiga) people collect the tourism revenue. This represents systematic cultural assimilation: they don’t want us practicing our culture for our identity and heritage, but rather as a commodified resource for government tourism income. Our sacred cultural practices become performance for others’ profit while we remain impoverished.</p>	<p><i>The Project does not entail or support the use of cultural heritage for commercial purposes by non-Batwa. None of the activities cited in the Request (“...Batwa individuals to perform our cultural practices for tourists...”) are supported by or related to the Project.</i></p> <p><i>The Request also refers to government schemes for tourism revenue-sharing that are separate from and entirely unrelated to the Project.</i> The Project is not associated with the revenue-sharing schemes that exist for park fees or gorilla permits or the percentage of such revenues that is shared by UWA with park-adjacent communities. It is therefore incorrect that the Project would be responsible for an allegedly unfair distribution of such revenues between government bodies and local communities, including Batwa communities.</p> <p><i>The Project does not provide support to the so-called “Batwa trail” in Mgahinga or the “Batwa experience” in Bwindi which include demonstration of Batwa cultural practices by the Batwa guides for tourists,</i> which are co-managed by UWA and local Batwa groups. These two tourism products predate the Project and were originally supported by donor financing from USAID and the Batwa Development Program (a non-Batwa-led support NGO), and have their own governance and revenue-sharing arrangements unrelated to the Project. The Project also does not provide any support to the Batwa trail in Semuliki, which is a tourism product recently launched and co-managed by UWA and the local Batwa community.</p> <p>The Project has provided limited support to the Batwa trail in Echuya CFR, as noted below in Item 8.</p>
8.	<p>Deepening economic marginalization: While our culture generates tourism revenue in our traditional territories, we receive no meaningful share of</p>	<p><i>Management notes that the Project does not support activities that commercialize Batwa culture to the benefit of the government or “non-indigenous” intermediaries. As noted above, the Project does not support any of the tourism products co-managed by UWA and Batwa groups under existing and separate tourism schemes.</i></p>

No.	Claim	Response																								
	<p>these benefits. The project structures ensure that conservation and tourism profits flow to government agencies and non-Indigenous intermediaries, further entrenching our economic exclusion from lands that once sustained us and which we protected.</p>	<p><i>The activities supporting Batwa communities were determined based on the VMGP consultations and the Project’s scope and objectives. Against this backdrop Management disagrees with the allegation that the Project would “deepen the economic marginalization.”</i></p> <p><i>Direct Project benefits for Batwa communities:</i> Since the VMGPs began to be implemented in 2023, 230 Batwa community members have benefitted from direct Project support through investments such as training in sewing, crafts making, and beekeeping (and required inputs); training in tour guiding; training in enterprise development, including mushroom and vegetable growing; and hands-on training in construction of fuel-efficient cook stoves. Also, 14 water tanks have been provided for rainwater harvesting systems.</p> <p>In Echuya specifically, the Project also supported the local guides group (which includes Batwa members) in response to their request for support to rehabilitate an existing trail that they operate in collaboration with NFA. The activity involved trail clearance and signage installation and provided employment for 15 people, including 10 Batwa.</p> <p>Further investments of this type (including expanding on the activities completed to date and building on the lessons learned) have been discussed as part of the consultations on updating of the VMGPs.</p> <table border="1" data-bbox="646 978 1468 1635"> <thead> <tr> <th data-bbox="646 978 792 1178">Protected Area</th> <th data-bbox="792 978 1024 1178">Number of Batwa beneficiaries</th> <th data-bbox="1024 978 1227 1178">Estimated Batwa population in park-adjacent communities (persons)*</th> <th data-bbox="1227 978 1468 1178">Estimated Batwa population in park-adjacent communities (households) *</th> </tr> </thead> <tbody> <tr> <td data-bbox="646 1178 792 1289">Bwindi</td> <td data-bbox="792 1178 1024 1289">50 (plus 10 water tanks)</td> <td data-bbox="1024 1178 1227 1289">1,403</td> <td data-bbox="1227 1178 1468 1289">277</td> </tr> <tr> <td data-bbox="646 1289 792 1337">Echuya</td> <td data-bbox="792 1289 1024 1337">62</td> <td data-bbox="1024 1289 1227 1337">Ca. 2,200</td> <td data-bbox="1227 1289 1468 1337">452</td> </tr> <tr> <td data-bbox="646 1337 792 1415">Mgahinga</td> <td data-bbox="792 1337 1024 1415">68 (plus 1 water tank)</td> <td data-bbox="1024 1337 1227 1415">362</td> <td data-bbox="1227 1337 1468 1415">80</td> </tr> <tr> <td data-bbox="646 1415 792 1526">Semuliki</td> <td data-bbox="792 1415 1024 1526">50 (plus 3 water tanks)</td> <td data-bbox="1024 1415 1227 1526">160</td> <td data-bbox="1227 1415 1468 1526"></td> </tr> <tr> <td data-bbox="646 1526 792 1635">Total</td> <td data-bbox="792 1526 1024 1635">230 (plus 14 water tanks)</td> <td data-bbox="1024 1526 1227 1635">Ca. 4,125</td> <td data-bbox="1227 1526 1468 1635"></td> </tr> </tbody> </table> <p><i>*Source: original VMGPs.</i></p> <p>In addition, Batwa communities are offered employment opportunities for field activities funded by the Project – such as renovation of the buffalo wall in Mgahinga, where 19 Batwa were employed, and removal of invasive vegetation in Mgahinga, where 21 Batwa were employed.</p>	Protected Area	Number of Batwa beneficiaries	Estimated Batwa population in park-adjacent communities (persons)*	Estimated Batwa population in park-adjacent communities (households) *	Bwindi	50 (plus 10 water tanks)	1,403	277	Echuya	62	Ca. 2,200	452	Mgahinga	68 (plus 1 water tank)	362	80	Semuliki	50 (plus 3 water tanks)	160		Total	230 (plus 14 water tanks)	Ca. 4,125	
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No.	Claim	Response
		<p>Overall, the Project has delivered direct benefits to a total of over 5,500 beneficiaries in park-adjacent communities:</p> <ul style="list-style-type: none"> • 4,415 households received energy saving stoves • 700 rainwater harvesting tanks have been installed • 180 Batwa beneficiaries and 95 beneficiaries in women’s groups trained on crafts and tailoring and provided with necessary inputs • 65 people trained on bee keeping and provided with necessary inputs • 47 community members trained on ecotourism.
9. (a)	<p>Prior contact with Bank Management: We submitted formal petitions in October 2024 and have been in ongoing communication throughout 2024-2025. World Bank staff REDACTED and REDACTED have been responsive to our concerns and attempted to facilitate dialogue. However, the fundamental problems persist:</p>	<p>Direct engagement between the Requesters and the Project team—led by MWE as the coordinating agency and including the World Bank team (comprising both the Task Team and the GRS team)—began in October 2024. This followed the submission of a petition by three Batwa-led CSOs, initially to MWE and later to the World Bank.</p> <p>The petition was submitted by the following Batwa-led organizations: Batwa Indigenous Development Organization (BIDO), Batwa Indigenous Empowerment Organization (BIEO), and Batwa Development Organization (BDO). The complaint primarily concerned legacy issues related to the displacement of the Batwa people from three protected areas in the early 1990s, some of which now overlap with the Project area: Bwindi Impenetrable National Park, Mgahinga Gorilla National Park, and Echuya CFR.</p> <p>Management notes that these three organizations do not represent all Batwa communities living near the targeted PAs.</p> <p>In response to the concerns, the GOU and World Bank fielded four missions to the three PAs mentioned in the complaint:</p> <ul style="list-style-type: none"> • In January 2025, led by the World Bank Country Manager for Uganda; • In April 2025; • In July 2025, to act as observers to consultations related to the revision of the VMGPs for Bwindi, Echuya, and Mgahinga; • In October 2025, to act as observers to consultations related to the revision of the VMGP for Semuliki. <p>MWE and the Bank team met on three occasions with the complainant CSOs to discuss the concerns: on January 28, 2025; April 22, 2025; and July 11, 2025.</p> <p>In addition, a number of online meetings were held both directly with the Government (with the Bank team observing) and with the Bank team – on November 26, 2024; January 23, 2025; February 20, 2025; and August 21, 2025.</p>

No.	Claim	Response
		<p>Engagements with BIDO and BIEO continued until they withdrew in July 2025. A meeting was held between the three original complainant CSOs and the Bank on July 11, 2025, during the period of consultations on VMGPs revisions. A few days later, the two CSOs sent a letter to the Bank informing the Bank of their withdrawal from the complaint, leaving only one CSO. No follow-up meeting was granted for the Bank to better understand the reasons for the disengagement, despite two requests from the Bank, including offers to meet in their location.</p>
<p>9. (b)</p>	<p>(1) Government implementing agencies (Ministry of Water and Environment, Uganda Wildlife Authority, National Forest Authority) continue to ignore ESS7 requirements;</p>	<p><i>Project preparation met the applicable requirement of ESS7. There is no indication or evidence supporting the Request’s statement that the Borrower ignored these requirements. It appears that the Request may not have considered key provisions of ESS7, specifically on the circumstance under which FPIC is required, which does not apply in this case.</i></p> <p>Once the Project identified Batwa as present in the vicinity of four PAs, it developed, adopted, disclosed and implemented the appropriate environmental and social instruments: i.e., the VMGF in 2020 and four site-specific VMGPs in 2023 (currently being re-consulted with the Batwa communities and CSO/NGOs and following such consultations updated to incorporate relevant feedback). It also integrated ESS7 considerations into core instruments such as the SEF, SEP, ESCP and ESMF, particularly to ensure their meaningful and culturally appropriate consultations. As detailed in Item 1 above, the Project engaged Batwa communities, Batwa-led organizations, and CSO organizations working on Batwa issues by using culturally appropriate methods (including community meetings conducted in their local languages and providing translated summaries for their informed participation), sending invitations ahead of time and reaching out to communities, organizations and their recognized local leadership where this exists (i.e., the Batwa King for the community close to Semuliki).⁴⁷ Given that Batwa communities in Bwindi, Mgahinga, and Echuya do not have a similar recognized authority over all the Batwa community members in such areas and that Batwa representation and organization is complex, the Project has engaged a broad range of communities and organizations (both led by and working with Batwa communities). Their feedback has shaped and continues to shape the Project (as reflected in the VMGPs’ development and update and in the crafting of livelihood support measures for Batwa communities). Therefore, the Project has sought to carry out meaningful consultations tailored to Batwa communities living around the four PAs targeted by the Project, in line with ESS7.</p> <p>As explained under Item 1 above, FPIC is not applicable to the Project.</p>
<p>9. (c)</p>	<p>(2) Unauthorized individuals, including non-Indigenous people</p>	<p>See also Item 3 regarding representation.</p>

⁴⁷ This king for the community in Semuliki has been engaged in Project consultations since 2020 and has been at the consultations held on October 28, 2025 in this area.

No.	Claim	Response
	like REDACTED, interfere in Indigenous consultation processes;	<p><i>The stakeholder engagement carried out by the Borrower under the Project has complied with ESS7 and ESS10 requirements. These standards require Borrowers to undertake inclusive stakeholder consultations. Management is aware of disagreements between various groups within the Batwa community and the challenges resulting from competing leadership claims. Management also notes that no single entity or organization represents all Batwa communities or organizations in these Project areas. While the Request claims there has been “unauthorized” representation, it fails to specify which representative or organization it considers “authorized” to speak on behalf of (which) Batwa communities.</i></p> <p>The Project has made significant efforts to ensure that all Batwa communities, as well as CSO/NGO groups that are Batwa-led or work with Batwa issues, are included and consulted. The invitations to consultations are issued by the local District Community Development Officers—who are knowledgeable about the local stakeholder landscape—in addition to the stakeholder invitations issued by the implementing agencies directly. This provides for a broad coverage of those invited to participate in the consultations. The Project seeks to ensure that consultations are conducted with all parties that recognize themselves as Batwa without prejudice to any group, in line with ESS7 and ESS10, to ensure that the consultations are inclusive.</p> <p>The three Batwa-led CSOs that submitted the original GRS complaint were all involved during the consultations in Echuya, Bwindi, and Mgahinga in connection with the update to the VMGPs and in the original VMGP development. However, two of the three CSOs requested that the Project not contact them further, citing concerns about unauthorized representation by Batwa individuals “without community mandate.” Bank policy requires inclusive stakeholder engagement – thus, a request from two CSOs to exclude other stakeholders that work on Batwa issues and whom they consider “unauthorized” cannot be accommodated by the Project.</p>
9. (d)	(3) The consultation framework itself treats Indigenous peoples as general “civil society” rather than applying ESS7 standards.	<p>See also item 1 above.</p> <p><i>The Borrower undertook specific focused engagements with the Batwa communities and various CSOs working for the benefit of the Batwa. ESS7 requirements have been applied to the consultations, which would not have occurred had the Project indeed treated Batwa groups as “general civil society,” as alleged in the Request.</i></p> <p>The November 2024 complaint to the Bank included a request that the Batwa be represented on the national implementation committee for the Project, i.e., the Project Steering Committee. Management notes that Batwa communities are not the only beneficiaries of the Project, nor does the Project provide benefits only to indigenous peoples groups. Moreover, the Project does not support any activities that would require FPIC. It is therefore not appropriate to include a single local group of beneficiaries at the national level. Rather, NGOs and CSOs working in the natural resources sector are organized in an environment and natural</p>

No.	Claim	Response
		<p>resources CSO network,⁴⁸ which has one representative on the Project Steering Committee.</p> <p>The Project consultations undertaken and ongoing for Batwa communities have been specifically designed and implemented on the basis of their explicit recognition as Indigenous Peoples / Sub-Saharan African Historically Undeserved Traditional Local Communities meeting the criteria of ESS7. This is clearly reflected in the SEP, VMGF, and VMGPs, as well as in the records of the consultations conducted thus far, the documentation shared with them for the purpose of their informed engagement; the use of specific guiding questionnaires for those facilitating the engagement with Batwa communities and organizations; and other culturally specific arrangements targeting Batwa communities (e.g., use of local languages and translators, Batwa-focused discussion groups, and a pre-consultation sensitization session for better information of the communities). These processes and measures demonstrate that they have not been treated as “general civil society” in the targeted consultations with them in all four PAs where Batwa live nearby.</p>
10.	<p>Despite the good faith efforts of some World Bank staff, the project structure allows government agencies to violate Indigenous rights while using unauthorized representatives to claim “Batwa consultation” has occurred. We were ultimately forced to withdraw from the process in July 2025 due to serious safety concerns and continued violations, but the project continues to operate without proper Indigenous consultation.</p>	<p>See Items 3 and 9 (b) above</p>
11.	<p>Fear of Reprisals. Our representatives have already experienced concerning incidents, including potential intimidation tactics on roads after meetings. We documented safety concerns in our formal withdrawal letter.</p>	<p>See Item 6 above.</p>

⁴⁸ This is a long-established, self-organized CSO network that is widely recognized and accepted among CSOs (<https://enrcso.org/>)