

**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

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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 gazettement 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 1024 520"><i>CSO/NGO Consultations</i></th> <th data-bbox="1024 478 1481 520"><i>Stakeholders in Attendance</i></th> </tr> </thead> <tbody> <tr> <td data-bbox="646 520 1024 722"><i>Bwindi (Buhoma), June 2022</i></td> <td data-bbox="1024 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 1024 863"><i>Bwindi (Rushaga), June 2022</i></td> <td data-bbox="1024 722 1481 863">Batwa Indigenous Development Organization, Nkuringo Cultural Center, Batwa Development Organization</td> </tr> <tr> <td data-bbox="646 863 1024 1003"><i>Echuya, Sept 2022</i></td> <td data-bbox="1024 863 1481 1003">Nature Uganda, Bwindi Mgahinga Conservation Trust, Nkuringo Cultural Center, Batwa Development Organization</td> </tr> <tr> <td data-bbox="646 1003 1024 1262"><i>Mgahinga, Sept 2022</i></td> <td data-bbox="1024 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 1024 1371"><i>Semuliki, Oct 2022</i></td> <td data-bbox="1024 1262 1481 1371">Cross Cultural Foundation of Uganda, Wildlife Conservation Society, Children Foundation</td> </tr> <tr> <td data-bbox="646 1371 1024 1696"><i>Bwindi/Echuya/Mgahinga (separate meetings), Jan 2025</i></td> <td data-bbox="1024 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 1024 1875"><i>Kisoro District, three meetings, April 2025</i></td> <td data-bbox="1024 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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⁴³ Partner engagements in Kisoro district covered Bwindi, Echuya, and Mgahinga.

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>
3.	<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="646 976 1469 1633"> <thead> <tr> <th data-bbox="646 976 792 1178">Protected Area</th> <th data-bbox="792 976 1024 1178">Number of Batwa beneficiaries</th> <th data-bbox="1024 976 1227 1178">Estimated Batwa population in park-adjacent communities (persons)*</th> <th data-bbox="1227 976 1469 1178">Estimated Batwa population in park-adjacent communities (households) *</th> </tr> </thead> <tbody> <tr> <td data-bbox="646 1178 792 1287">Bwindi</td> <td data-bbox="792 1178 1024 1287">50 (plus 10 water tanks)</td> <td data-bbox="1024 1178 1227 1287">1,403</td> <td data-bbox="1227 1178 1469 1287">277</td> </tr> <tr> <td data-bbox="646 1287 792 1335">Echuya</td> <td data-bbox="792 1287 1024 1335">62</td> <td data-bbox="1024 1287 1227 1335">Ca. 2,200</td> <td data-bbox="1227 1287 1469 1335">452</td> </tr> <tr> <td data-bbox="646 1335 792 1415">Mgahinga</td> <td data-bbox="792 1335 1024 1415">68 (plus 1 water tank)</td> <td data-bbox="1024 1335 1227 1415">362</td> <td data-bbox="1227 1335 1469 1415">80</td> </tr> <tr> <td data-bbox="646 1415 792 1524">Semuliki</td> <td data-bbox="792 1415 1024 1524">50 (plus 3 water tanks)</td> <td data-bbox="1024 1415 1227 1524">160</td> <td data-bbox="1227 1415 1469 1524"></td> </tr> <tr> <td data-bbox="646 1524 792 1633">Total</td> <td data-bbox="792 1524 1024 1633">230 (plus 14 water tanks)</td> <td data-bbox="1024 1524 1227 1633">Ca. 4,125</td> <td data-bbox="1227 1524 1469 1633"></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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		<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 Underserved 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/>)