

October 14, 2025

IPN REQUEST RQ 25/05

**Inspection Panel Notice of Registration
on a
Request for Inspection
Uganda: Investing in Forests and Protected Areas
for Climate-Smart Development Project
(P170466)**

Summary

1. On August 29, 2025, the Inspection Panel (the “Panel”) received a Request for Inspection (the “Request”) related to the World Bank (the “Bank”)-financed Uganda: Investing in Forests and Protected Areas for Climate-Smart Development Project (P170466) (the “Project”). The Request was submitted by two Batwa individuals residing near a Protected Area (PA) within the Project area, who claim to speak on behalf of the Batwa Indigenous People. The Requesters asked for confidentiality and raised serious threats and intimidation against them.
2. The Request alleges that this Bank-financed Project is perpetuating historical injustices against the Batwa people. It claims the Project has excluded the Batwa from meaningful participation in Project consultations and has not applied the Bank’s Environmental and Social Standard: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (ESS7). According to the Request, the Bank’s “*acceptance of unauthorized representation*” during the consultation process and failure to follow ESS7 is damaging relations between Batwa leaders and settlements, weakening their collective voice just when unity is essential for the survival of the Batwa people.
3. The Request states that the Project presents an opportunity for co-management and sharing of revenues generated from tourism that could support the Batwa’s livelihoods. Nonetheless, the Request alleges that the Project is systematically excluding the Batwa people from such benefits, further marginalizing them, and disregarding their traditional forest knowledge and cultural practices. Additionally, the Request claims that while the Project funds tourism initiatives that exploit Batwa culture, it excludes Batwa communities from receiving revenues these tourism activities generate.
4. Furthermore, the Requesters raise serious concerns about intimidation and reprisals arising from their engagement with the Project and Bank staff, alleging threats to their safety and violation of their rights to meaningful consultation and participation, including the requirement for Free, Prior, and Informed Consent (FPIC).

5. On September 16, 2025, the Panel acknowledged receiving the Request for Inspection by issuing a Notice of Receipt on its website. The Panel conducted its initial due diligence for the Request and met with the Requesters on September 24, 2025, and October 2, 2025, and with Bank Management on October 1, 2025. The Panel determined that the Request meets all applicable admissibility criteria. Therefore, by way of this Notice of Registration, I hereby inform you that I have registered this Request on October 14, 2025.

The Project

6. The Project was approved by the Board of Executive Directors (the “Board”) on April 23, 2020, for a total amount of US\$ 148.2 million, which includes a credit of US\$ 78.2 million and a grant of US\$ 70 million from the International Development Association (IDA). The expected Project Closing Date is June 30, 2026. At the time the Request was received the Bank had disbursed US\$ 50.01 million, or 33.41%, of the committed Project envelope.¹
7. The Project’s main implementing agencies include the Ministry of Water and Environment (MWE), the Uganda Wildlife Authority (UWA), and the National Forestry Authority (NFA).² Some components of the Project will also be implemented by targeted District Local Governments (DLG) and contracted Technical Service Providers (TSPs).³
8. According to the Project Appraisal Document (PAD), the Project Development Objective is to “*improve the sustainable management of forests and protected areas and increase benefits to communities from forests in target landscapes.*”⁴ The Project has four components:
 - ***Component 1 – Improved management of protected areas.*** This component focuses on improving management of government-managed forest and wildlife PAs to ensure they can continue to generate revenues and provide important environmental services. It supports National Parks (NP), Wildlife Reserves (WR), and Central Forest Reserves (CFR) in the Project area to strengthen their on-the-ground management. The UWA implements the activities under this component in NPs and WRs, while the NRA implements them in CFRs.
 - ***Component 2 – Increased revenues and jobs from forests and wildlife Protected Areas.*** This component aims to increase revenues and jobs from these forest and wildlife PAs through targeted investments in tourism and productive forests. It includes investments in tourism in selected NPs and CFRs within the Project area, implemented, respectively, by UWA and the NFA.
 - ***Component 3 – Improved landscape management in refugee-hosting areas.*** This component seeks to improve landscape management in refugee-hosting areas outside PAs, including by increasing tree cover on host community land and supporting sustainable forest management and landscape resilience on private and customary land.

¹ Meeting with Management, October 1, 2025.

² Project Appraisal Document (PAD), p. 2.

³ PAD, p. 25.

⁴ PAD, p. 1.

Activities under this component are led by MWE with the involvement of District Local Governments.

- **Component 4 – Project management and monitoring.** This component supports general project management and monitoring, including project reporting and evaluation.
9. The Project’s overall risks rating is now considered “*substantial*.” At the time of Project approval, the environmental and social risks rating had been “*moderate*” and was changed to “*substantial*” on April 29, 2025.⁵ On June 13, 2025, the environmental and social risk rating was further increased from “*substantial*” to “*high*.”⁶
10. At the time of appraisal, the Project identified the following environmental and social standards as applicable: ESS1 Assessment and Management of Environmental and Social Risks and Impacts; ESS2 Labor and Working Conditions; ESS3 Resource Efficiency and Pollution Prevention and Management; ESS4 Community Health and Safety; ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement; ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources; ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities; ESS8 Cultural Heritage, and ESS10 Stakeholder Engagement and Information Disclosure.⁷

The Request

11. The Request alleges that 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. The Request claims the Project is “*replicating and furthering historical injustices against the Batwa people,*” who were forcibly evicted from their ancestral forests in 1991 without receiving any compensation. The Request claims that without proper consultation, the Requesters were not allowed to come to the table to negotiate co-management arrangements or ways to share tourism revenues that could provide sustainable livelihood for their communities. It further alleges that Batwa people have been systematically excluded from meaningful participation and consultations, thereby perpetuating their economic exclusion and intergenerational marginalization.
12. The Request alleges the direct harms caused by the Project fall into three broad categories:
- i) **Exclusion from meaningful consultations and participation, deepening the marginalization of the Batwa Indigenous People.** The Request claims that by conducting consultations without genuine Indigenous representation, the Project effectively legitimizes the continuing exclusion of the Batwa people from their ancestral territories and resources. According to the Request, without “*proper*” consultations, Batwa communities have not been given the opportunity to negotiate co-management arrangements and benefit-sharing that could provide them with

⁵ Implementation Status & Results Report (ISR), Sequence 8, p. 2.

⁶ ISR, Sequence 9, p. 2.

⁷ PAD, p. 4.

sustainable livelihoods. The Request alleges that the Project’s consultation framework treats Indigenous Peoples as general civil society, thereby disregarding rather than applying the specific requirements of Environmental and Social Standard 7 regarding Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (ESS7). The Request further claims that the Bank has engaged with “*unauthorized representatives*,” including non-Batwa individuals, who the Requesters allege are interfering with the consultations occurring in Batwa communities and creating divisions between Batwa leaders and settlements. According to the Request, this weakens the collective voice and unity of the Batwa people.

- ii) **Ignoring traditional forest knowledge and cultural practices while exploiting Batwa culture and forcing their assimilation.** The Request claims that without proper consultation, the Project ignores Batwa traditional forest knowledge and cultural practices, which the Requesters believe could support both conservation outcomes and tourism development. It further alleges the Project funds tourism initiatives that exploit Batwa culture while excluding Batwa communities from receiving tourism revenues. The Request alleges systematic cultural assimilation and claims Batwa individuals are selected to perform cultural practices for tourists while UWA and non-Indigenous people collect the tourism revenue.
- iii) **Community safety and intimidation.** The Request alleges that attempts by Batwa Requesters to assert their rights during their engagement with Project and Bank staff have resulted in intimidation and attempts to silence their voices. According to the Request, the Requesters were ultimately forced to withdraw from the Project’s process in July 2025 due to serious safety concerns and continued violations of their rights.

Initial Due Diligence

13. After receipt of the Request, the Panel conducted initial due diligence and verified that the Request meets the admissibility criteria for registration. The Request is not frivolous, absurd, or anonymous, and was submitted by two individuals residing in the Project area in Uganda and who claim to be affected by the Project. The Panel received earlier correspondence between the Requesters and the Bank concerning the issues raised in this Request. The Request states that the Requesters submitted “*formal petitions*” to the Bank regarding their concerns had been sent in October 2024 and the Requesters had communicated with Bank staff from 2024 to 2025. Therefore, the Panel is satisfied that the issues raised in the Request were brought to the attention of the Bank prior to submission of the Request for Inspection. The Panel also verified that the subject matter of the Request does not concern issues of procurement, and that, at the time the Request was received the Project was 33.41% disbursed with an expected closing date of June 30, 2026. Finally, the Panel confirms this is the first Request for Inspection it received in relation to the Project and, therefore, the Panel has made no prior recommendation.

14. The Panel spoke with the Requesters on September 24 and October 2, 2025, to understand better their concerns and seek further clarifications, as well as to inform them about the Panel’s process and mandate. The Requesters repeated their belief that the Batwa people were inadequately consulted, and that the Project did not conduct specific consultations as per ESS7, including FPIC. They explained that, rather than enjoying meaningful consultations and participation as per Bank requirements, they were visited once and questioned about their livelihood activities in a perfunctory manner. According to them, they were not properly consulted as per Bank requirements for indigenous people.
15. The Requesters emphasized that the Project has engaged “*opportunistic*” individuals who do not represent the Batwa communities and who lack authorization to represent those communities or their interests; nevertheless, the Requesters claim, these people participate in Project consultations as if they speak on behalf of the Batwa communities. The Requesters also reiterated that they believe the Project furthers the exploitation of the Batwa indigenous culture by generating tourism revenue from it that is not shared with them. They raised concerns about Project activities that restrict their legitimate access to some of the PAs as well as their traditional forests and the resources located within these. The Requesters emphasized that they do not oppose the Project, but that they would like to be consulted and engaged as recognized Indigenous People.
16. According to the Requesters, the inadequate representation of the Batwa people, as well as the increasing intimidation and serious threats of retaliation they have faced, have led them to disengage from the Project. The Requesters have submitted additional documentation and audios regarding the alleged acts of intimidation and what they perceive to be the defamation directed at them.
17. As part of its initial due diligence process, the Panel also met with Management on October 1, 2025. Management briefed the Panel on the Project context and its status, while also providing its views on the issues raised in the Request. According to Management, the Request raises concerns about the overall situation of the Batwa in Uganda and cites historical injustices that predate the Project. In Management’s view, the allegations of marginalization and systemic exclusion are unrelated to the Project. Management explained that the Project has actively included Batwa communities in consultations and as Project beneficiaries. Management stated that since 2019, several rounds of consultations were held with the Batwa, as well as with organizations that work for the benefit of the Batwa people and communities. The Panel was told that the Bank estimates the Batwa population residing around the four PAs to number fewer than two thousand persons and at least fifty Civil Society Organizations (CSOs) have engaged with the Project. Management added that the Project has made all reasonable arrangements to ensure that all relevant groups have been consulted and included in the engagement process.

Registration of the Request

18. As provided in paragraph 18 of the Panel’s Resolution (the “Resolution”), “*the Chairperson of the Panel shall inform the Executive Directors and the President of the Bank promptly upon*

receiving a request for inspection.” With this notice, I hereby inform you that I have, on October 14, 2025, registered the above-mentioned Request.

19. The Panel’s registration implies no judgment whatsoever concerning the merits of a Request for Inspection. As provided in paragraph 19 of the Resolution,⁸ Bank Management must provide the Panel within 21 business days (by November 12, 2025) with a response to the issues raised in the Request for Inspection. The subject matter with which Management must deal in its response to the Request is set out in paragraph 20 of the Resolution.
20. After receiving the Management Response, the Panel will *“determine whether the request meets the eligibility criteria set out in paragraphs 13 to 15 [...] and shall make a recommendation to the Executive Directors as to whether the matter should be investigated.”*⁹ This Request has been assigned IPN Request Number 25/05.

Yours sincerely,



Ibrahim Pam
Chairperson

Attachments

The Executive Directors and Alternates
International Development Association

Mr. Ajay Banga, President
International Development Association

Requesters (Confidential)

⁸ The Resolution, para. 19.

⁹ The Resolution, para. 22.