

Complaint (Request for Inspection) Form

To:

The Chair, Inspection Panel

The World Bank Accountability Mechanism, MSN: MC 10-1007, 1818 H St., NW, Washington, DC 20433, USA. Fax: +1(202)-522-0916. Email: ipanel@worldbank.org

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

Section 1: Complaint

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

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

The project causes direct harm by:

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

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

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

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

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

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

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

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

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

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

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

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

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

4. Do you live in the project area?

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

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

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

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

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

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

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

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

Yes.

Section 2: Contact Information

9. Are you complainants or a representative of complainants*?
Complainants: Representing a complainant or community: Other: (Please explain)

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

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

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

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

Signature 1	Signature 2
[REDACTED]	[REDACTED]

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

NOTES:

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