

Inspection Panel

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

Investigation Plan

I. Introduction

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

The Project’s development objective is to improve the sustainable management of forests and protected areas and increase benefits to communities from forests in target landscapes. The Ministry of Water and Environment (MWE) is the coordinating entity for the Project along with the main implementing agencies: the Uganda Wildlife Authority (UWA) and the National Forestry Authority (NFA), the latter of which has recently been integrated into the MWE. The Project has four components; two of them are relevant to this investigation.

These two components support i) improving the management of government-managed forest and wildlife Protected Areas (PAs), including National Parks (NPs), Wildlife Reserves (WRs) and Central Forest Reserves (CFR), to ensure these areas continue to generate revenue and provide environmental services; and ii) targeted investments in tourism and productive forestry in selected NPs and CFRs with the aim of boosting revenues and jobs from the forests in these PAs. The first component includes the renewal and development of new Collaborative Resource Management (CRM) and Collaborative Forest Management (CFM) agreements which serve to allow individuals living within a certain radius adjacent to the PAs to access them in a regularized manner. In addition to supporting tourism activities, the second component includes upgrading a new wood processing training facility and expanding the scope of the forest processing industry subsidy scheme.

In substance, the Request alleges the Project perpetuated the marginalization and exclusion of the Batwa people in relation to their ancestral claim to access natural resources in the forests from which they were evicted in the 1990s. The Request claims the Project funds tourism initiatives that exploit Batwa culture but excludes Batwa communities from revenue-sharing associated with tourism. Furthermore, the Request states the Project excluded the Batwa from meaningful participation and alleges Project consultations were not “proper” indigenous consultations with specific reference to the requirement for Free, Prior, and Informed Consent (FPIC). The Requesters also raise serious concerns about their safety in connection with them raising concerns about the Project.

The Panel registered the Request on September 16, 2025, and Management submitted its response (the “Management Response” or “Response”) to the Request on December 1, 2025. On January 8, 2026, the Panel submitted its Report to the Board of Executive Directors and recommended an investigation into some of the matters alleged in the Request.¹

II. The Panel’s Investigation Recommendation

In its Report and Recommendation, the Panel determined that the Requesters and the Request met the technical eligibility criteria set forth in the Panel Resolution, except for the allegations in relation to the Project regarding i) compensation, land, and restitution for historical evictions, and ii) harm associated with tourism-related revenue-sharing schemes, unless related to the Project’s Component 2 that aims to boost revenues and create jobs via targeted investments in this sector.² Therefore, the Panel excluded these two sets of allegations from its investigation recommendation.

The Panel’s recommendation to investigate is based on its determination that the Project might be perpetuating the marginalization of the Batwa in relation to their ancestral claim to access natural resources in the forests from which they were evicted and the exclusion from participation in co-management arrangements and benefit-sharing. The Panel observed that the Project recognizes the Batwa’s collective attachment to these forests and states this as the basis for the Project to deliver benefits to Batwa communities. The Panel seeks to clarify whether the measures the Project put in place to deliver benefits may be restricting the Batwa’s collective rights. In addition, the Panel seeks to clarify whether the Project’s support to tourism expansion, under Component 2, could have a negative impact on the Batwa’s culture.

The Panel noted that the alleged harm is of a serious nature and that there is a plausible link between the alleged harm and potential non-compliance by the Bank with its operational policies and procedures. The Panel investigation would review compliance with the Bank’s Environmental and Social Policy for Investment Project Financing and related standards, particularly Environmental and Social Standards 7 and 10,³ as well as the Bank Directive on Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups, and the Bank’s Policy and Directive related to Investment Project Financing. On January 23, 2026, the Board approved this recommendation.

As per the Resolution,⁴ the Head of the Dispute Resolution Service (DRS) offered dispute resolution to the parties (Requesters and Borrower). On March 9, 2026, the Head of DRS reported to the Board and informed the Panel that no agreement had been reached to pursue dispute resolution.⁵ This has triggered the Panel to commence its Investigation.

¹ Inspection Panel, [Report and Recommendation on a Request for Inspection – Uganda: Investing in Forests and Protected Areas for Climate-Smart Development Project \(P170466\)](#), dated January 8, 2026.

² [The World Bank Accountability Mechanism: Inspection Panel and Dispute Resolution Service](#) (the “Resolution”), March 7, 2025, paras. 13-15 and 29.

³ ESS 7 relates to Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities and ESS 10 relates to Stakeholder Engagement and Information Disclosure.

⁴ The Resolution, para. 68.

⁵ [DRS Notice – No Agreement to Pursue Dispute Resolution](#), March 9, 2026.

III. Scope of the Investigation: Issues of Harm and Compliance

This document presents the investigation plan as required by the Panel's Operating Procedures.⁶ It includes the key questions and issues to be addressed during the Investigation, and a brief description of the Investigation's methodology. This plan is publicly available on the Panel's website on the [case related page](#). It is a living document and will be adjusted as needed.

The Panel's investigation relates to two aspects of the Project that are raised in the Request: first, allegations related to the perpetuation of the Batwa's marginalization and collective attachment to the forests to which they lay ancestral claim and second, the allegations related to meaningful participation in co-management arrangements and benefit-sharing, as well as representation and community safety. Therefore, the Panel's Investigation will analyze:

A. Allegations related to the perpetuation of the Batwa's marginalization and collective attachment to the forests to which they lay ancestral claim

- a. How does the Project consider the Batwa communities in the Project area, and what approach has it taken to ensure Project activities are delivered, as per the requirements set out in the relevant Bank policies?
- b. How does the Vulnerable and Marginalized Groups Framework (VMGF) consider the Batwa communities in the Project area in relation to ESS7 on Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities?
- c. Does the VMGF recognize their collective rights, including their collective attachment to the forests from to which they lay ancestral claim and have traditionally or customarily used or occupied? How do such rights relate to providing Batwa access to the Protected Areas (PAs) and the natural resources therein?
- d. If applicable, how have collective rights been considered in the development and implementation of site-specific Vulnerable and Marginalized Group Plans (VMGPs)? How have Batwa communities been considered for granting access to the forests and forest-based natural resources in the relevant PAs?
- e. Do the additional benefits considered for delivery by the Project sufficiently target the livelihoods of the Batwa communities?
- f. How do these aspects relate to Bank requirements stipulated in the Environmental and Social Policy for Investment Project Financing, the related Environmental and Social Standard 7, and the Bank Directive on Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups?

B. Allegations related to the Batwa's exclusion from meaningful participation in co-management arrangements and benefit sharing and their representation in the Project

- a. How were the Batwa communities included in the consultation process in the early stages of the process and in the preparation of the VMGF and, subsequently, in the development of the VMGPs?
- b. Is there any connection between the VMGPs and the Collaborative Resource Management (CRM) and Collaborative Forest Management (CFM) agreements?

⁶ The Inspection Panel, [Operating Procedures](#), November 2025, paras. 60 and 71.

- c. How has the participation of the Batwa communities been included in the negotiation of CRM and CFM agreements? How were the Batwa communities in the four PAs engaged to participate in the renewal of existing and the formation of new CRM and CFM groups? Has their participation evolved? Are the CRM and CFM agreements affecting Batwa's collective ancestral claims to these forests? How was the requirement for free, prior informed consultations considered?
- d. Has the Project's approach to ensuring the participation of Batwa considered the historic power imbalance between them and other more dominant social groups as well as with district authorities? How was Batwa representation determined? Were measures put in place to ensure that the Batwa communities' participation was effective?
- e. How do these aspects relate to the Bank requirements in the Environmental and Social Policy for Investment Project Financing, the related Environmental and Social Standard 7, and the Bank Directive on Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups?
- f. How, if at all, does the Project's support for tourism expansion, under Component 2, impact (positively and/or negatively) Batwa communities' livelihoods and their traditional culture?

C. Allegations related to the Requesters' and community's safety

- a. How was the engagement with the Batwa communities (participation and meaningful consultations) designed to ensure they were provided with a safe space, free of discrimination, intimidation and reprisals?
- b. How do these aspects relate to the Bank requirements in the Environmental and Social Policy for Investment Project Financing, the related Environmental and Social Standard 10, and the Bank Directive on Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups?

D. Bank Supervision

- a. Was Bank supervision of the Project adequate and in accordance with Bank policies (e.g., the quality and frequency of supervision)?
- b. Did the Bank ensure that a proper monitoring and reporting system was in place to oversee the execution of the contractual arrangements, especially the development and the implementation of the site-specific VMGPs?
- c. How do these aspects relate to the Bank requirements in the Policy and Directive for Investment Project Financing?

IV. Methodology of Fact Finding

For the purposes of this Investigation, the Panel will enlist the assistance of two expert consultants:

- An expert with substantial knowledge and expertise on the rights of Indigenous People and Vulnerable and Marginalized Groups in the Sub-Saharan African context, including the situation of the Batwa in Uganda.
- An anthropological expert with substantial knowledge and expertise in Indigenous rights and FPIC processes in relation to customary use of land and other natural resources and the forestry, agricultural and/or conservation sectors.

- Ideally, both experts will be familiar with the relevant safeguard policies and standards of the World Bank and/or other MDBs, and they have worked on issues pertaining to Indigenous Peoples with ancestral claims to land and other natural resources in Protected Areas.

The Investigation will proceed in three phases:

- (i) Investigation preparation and identification and hiring of expert consultants,
- (ii) Review of Project documentation, staff interviews, and a potential field visit, and
- (iii) Report drafting and finalization.

During its investigation, the Panel team will consult with the Requesters, other community members, Bank staff, the implementing agencies, relevant ministries, and other relevant development partners and stakeholders.

The Panel aims to conclude its Investigation within six months of this plan being disclosed. The Panel's Investigation Report and the Management Response and Recommendation (including the Management Action Plan) addressing the Panel's findings, if any, will be made publicly available after the Board meets to consider the Panel's findings and to discuss and approve the Management Action Plan.