IBRAHIM JAMES PAM
Chairperson
The Inspection Panel

IPN REQUEST 26/02

March 27, 2026

MEMORANDUM TO THE EXECUTIVE DIRECTORS AND ALTERNATES OF THE INTERNATIONAL DEVELOPMENT ASSOCIATION

Inspection Panel

Notice of Non-Registration on a Request for Inspection

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

Summary

1. In accordance with paragraph 18 of the Resolution of the World Bank Board of Executive Directors (the "Board"), the World Bank Accountability Mechanism: Inspection Panel and Dispute Resolution Service (the "Resolution"),[1] I hereby inform you that on February 12, 2026, the Inspection Panel (the "Panel") received a second Request for Inspection (the "Request") related to the Uganda: Investing in Forests and Protected Areas for Climate-Smart Development Project (P170466) ("IFPA-CD" or the "Project"). The second Request was submitted by one individual representing 10 affected co-signatories from the sub counties of Bugaaki, Uganda. This Request raises concerns regarding retaliation or threats due to a heavy militarized presence. A redacted copy of the Request for Inspection is attached as Annex I.

2. The Request alleges that the Project is earmarking plantations and paving the way for its tree-planting program that has resulted in evictions, access restrictions, loss of livelihoods, loss of property and land, and destruction of cultural and burial sites. It further claims that consultations were inadequate, and when they occurred, they were held under *"militarized and politically sensitive conditions."* According to the Request, the Project is in violation of Environmental and Social Standards (ESS) ESS5 on Land Acquisition, Restrictions on Land Use and Involuntary Resettlement, ESS8 Cultural Heritage, and ESS10 on Stakeholder Engagement and Information Disclosure. The Request adds that the concerns were reported to local authorities who promised to mediate the impact on communities, however it reports that this was never fulfilled.

3. After conducting its initial due diligence, the Panel concluded that this Request does not meet one of the admissibility criteria for Registration. The Panel is not satisfied that Management

[1] The World Bank Accountability Mechanism: Inspection Panel and Dispute Resolution Service (March 7, 2025).

Official Use Only

has been made aware of the issues raised in the Request prior to its submission. I am therefore notifying you that the Panel is not registering this Request.

The Project

4. The Board approved the Project on April 23, 2020, with a total cost of USD 178.20 million. Of this, USD 148 million equivalent financed through the International Development Association.[2] The implementing agency is the Ministry of Water and Environment, Uganda Timber Growers' Association, Uganda Wildlife Authority. The current closing date of the Project is June 30, 2026.

5. The Project Development Objective is to improve sustainable management of forests and protected areas and increase benefits to communities from forests in target landscapes.[3] The Project has three components. The first aims to strengthen the management of government-managed forest and wildlife protected areas, while the second aims to increase revenues and jobs from these areas through targeted investments in tourism and productive forests. The third promotes greater tree cover and sustainable forest management on host-community land in refugee-hosting districts, covering 17 districts that either host or are within 5 km of refugee settlements.[4] At the time of Project approval, all Environmental and Social Standards of the World Bank's Environmental and Social Framework were considered relevant with the exception of Financial Intermediaries (ESS9).[5]

The Request

6. The Request alleges that more than 200 households were displaced after boundary markers of the Itwara forest reserve were established without consultation with local community members or proper surveying. It also claims that armed patrols are restricting community members' access to their tea plantations and gardens, and that some plantations have been "*marked for cutting*" to facilitate the tree-planting program under the Project. As a result, the affected community, predominantly dependent on tea cultivation, reports loss of land, crops, and productive assets.

7. The Request adds that the alleged loss of access to tea plantations, their primary income source, has led to significant livelihood impact, including reduced household income, school dropouts, and increased criminality and domestic violence. The Request further states that no action or measure was taken to mitigate adverse impacts on the displaced persons, and that the loss of land has had significant impact on community members' livelihoods.

8. The Request adds that community members were not consulted at the time of *"introduction."* According to the Request, where consultation occurred, they were reportedly conducted under military intimidation, with some individuals coerced into accepting "*terms under which their land would be grabbed*," and in circumstances where "*community members were given instructions to adhere with limited input about their concerns such as impacts on livelihoods*."

[2] PAD, p. 2.
[3] PAD, p. 15, para 36.
[4] PAD, p.17, para 38.
[5] PAD, p. 4.

Official Use Only

9. Additionally, the Request further claims that cultural sites, essential to their cultural identity, such as places of worship and graves, were reportedly destroyed "*with no trace,*" and access to these sites is now restricted under threat of prosecution and imprisonment. The Request adds that other activities, such as collecting medicinal plants and firewood have been suspended indefinitely.

Panel's Observation and Determination

10. In accordance with the Panel's Operating Procedures,[6] and following its review of information gathered through due diligence, the Panel confirms that the Request does not meet one of the admissibility criteria for Registration. The Panel determines that the Request is not frivolous, absurd, or anonymous. The Panel also confirms that the Request was submitted by one representative on behalf of ten signatories located in the sub counties of Bugaaki, Uganda, who claim to be affected by the Project. The Panel further notes that, at the time of submission of the Request, the Project was 40% disbursed. The Panel adds that the subject matter of the Request does not concern procurement and that, although this is the second Request related to the Project, the Panel has not previously made a recommendation on these issues. During the Panel's meeting with the Requesters, they confirmed they had not yet contacted Bank Management.

11. Based on the foregoing, the Panel considers that Management was not made aware of the issues raised in the Request prior to its submission, as set out in paragraph 14 of the Resolution and paragraph 14(d) of the Operating Procedures. I therefore notify you that the Panel is not registering this Request.

12. This non-registration does not preclude the possibility of a future Request for Inspection related to this Project.

Yours sincerely,

Ibrahim Pam
Chairperson

[6] Resolution No. IDA 2025-0001 The World Bank Accountability Mechanism: Inspection Panel and Dispute Resolution Service (March 7, 2025) and Inspection Panel Operating Procedures (November 2025).

Official Use Only

Attachments

The Executive Directors and Alternates
International Development Association

Mr. Ajay Banga, President
International Development Association

Requesters (Confidential)

Official Use Only

Annex I

Request for Inspection (Redacted)

The Inspection Panel | THE WORLD BANK
IBRD • IDA | WORLD BANK GROUP

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.

1. Loss of property such as land, plantations resulting from evictions by the project implementer

Over 200 households in the sub counties of Bugaaki have been evicted/displaced from their land. The project implementer has established boundary marks without consulting with local community members. Neither there were nor any deliberate efforts to use professional services of surveyors to establish the exact boundaries of community land and Itwara forest reserve. Upon establishing boundary marks, the National Forest Authority put in place a strong armed patrolling / enforcement team that prevent community members from accessing their tea plantations and gardens. It is important to note that the impacted community is a predominantly tea cultivating community where capital and many years of investment have been committed. Some plantations have been ear marked for cutting to pave way for the tree planting a program under this project

2. Lost livelihoods due to the loss of land

Because community members can no longer access their plantations, their livelihoods have been significantly impacted adding pressure on the already strained community that is fresh from the Covid 19 pandemic. Children no longer attend school because of declined sources of income, increased criminality and domestic violence at house hold level.

3. Lack of consultations and where consultations were conducted these were insufficient

Community members were not consulted at the time of introducing. Where consultations were made, they were characterized by heavy military intimidation. Community members were coerced to accept the terms under which their land would be grabbed. Some fortunate community members were left with small pieces of land where they would put their shelters while others lost all their land and property without having a say on their land or property.

4. Cultural desecration

Cultural sites such as worshiping places, graves were destroyed with no trace. Impacted community members no longer access these places and if found they risk prosecution and imprisonment. Other activities like collecting local herbs/medicinal plants and dead wood for firewood have been indefinitely suspended.

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

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

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

The project is located at Itwara forest reserve in the [redacted]

4. Do you live in the project area?

[redacted]

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.

No. However, these concerns were reported to the local authorities who promised to mediate impacted community members with the implementer of the project. This promise was never fulfilled

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

The project is in violation of Environmental and Social Standards (ESS) ESS5, ESS8, ESS10

ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement – The project has displaced / evicted community members from their land. The Bank's policy states that any project it finances must ensure involuntary resettlement is avoided. The policy further states that where involuntary resettlement is unavoidable, it will be minimized and appropriate measures to mitigate adverse impacts on displaced persons (and on host communities receiving displaced persons) will be carefully planned and implemented. There was no action or measure taken to mitigate adverse impacts on the displaced persons. The loss of land has had significant impact on community members' livelihoods the major cause of increasing criminality such as theft and domestic violence.

ESS8: Cultural Heritage – Community members accuse the project implementers National Forest Authority of cultural desecration. The community members state that the National Forest Authority has systematically destroyed their cultural sites and burials which are they consider essential to their cultural identity. ESS8 recognizes that cultural heritage provides continuity in tangible and intangible forms between the past, present and future. While the policy is intended to set out measures designed to protect cultural heritage throughout the project life-cycle, the project implementer's acts have erased communities' cultural heritage and identity.

ESS10: Stakeholder Engagement and Information Disclosure – Some community members impacted by the project were not consulted, while those consulted state that consultations were held under militarized and politically sensitive conditions. The meetings were held in circumstances where community members were given instructions to adhere with limited input about their concerns such as impacts on livelihoods. ESS10 recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice.

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

Yes. The project has been heavily militarized and community members fear that they may be easy target in an event the enforcement officers get to know the identities of the complainants.

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. Provided it will ensure the risk of reprisal is eliminated

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]	

Address	[redacted]	
Phone	[redacted]	
Email	[redacted]	

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

[redacted]ignature 1	Signature 2

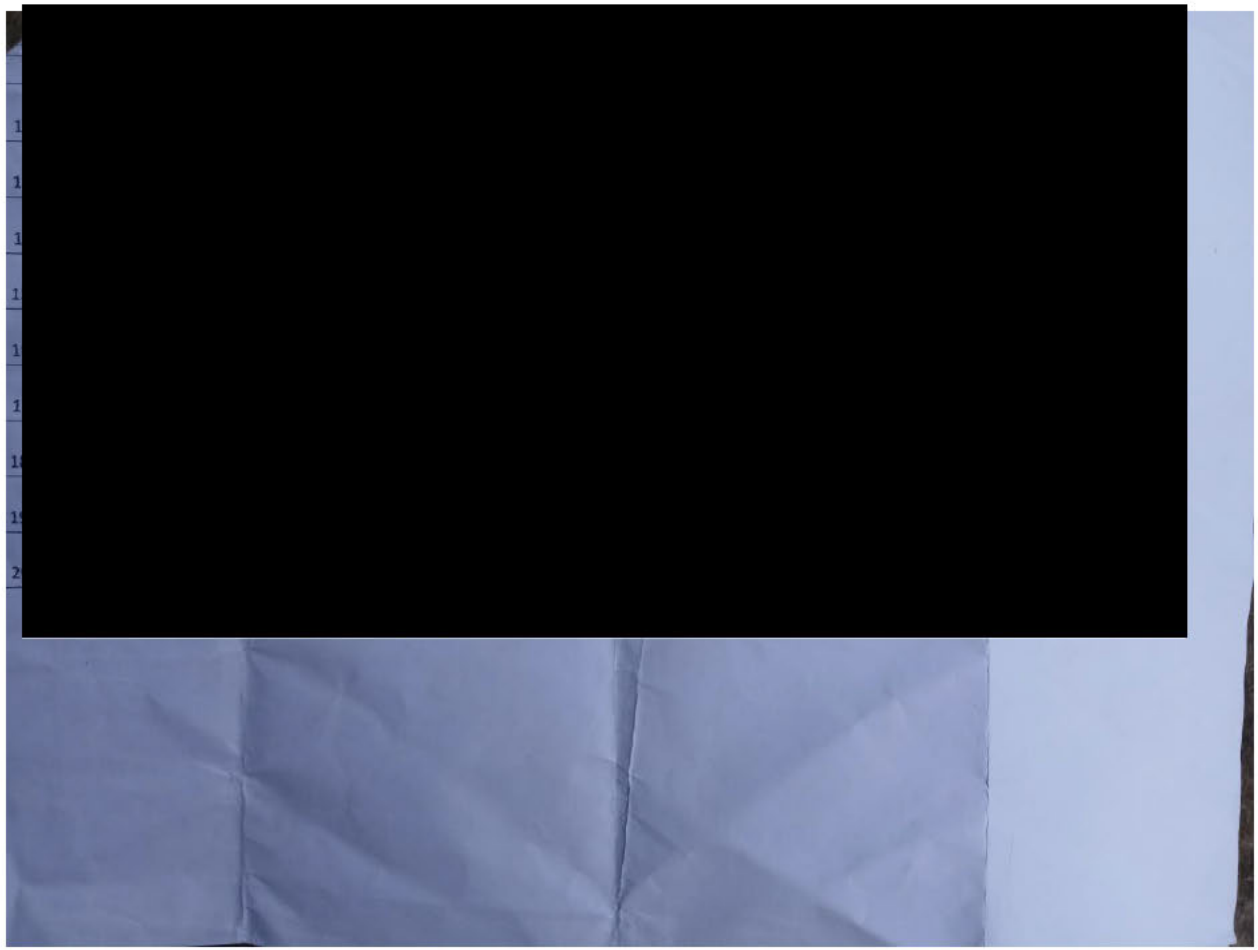
Signatures (more signatures can be sent as an attachment):

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.*

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

Complainants: [redacted]
Community representative: [redacted]

We the undersigned community members authorize [redacted] *to represent us on the complaint submitted to the World Bank's Inspection Panel*

S/N	Name	Village	contact	signature
[redacted]