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

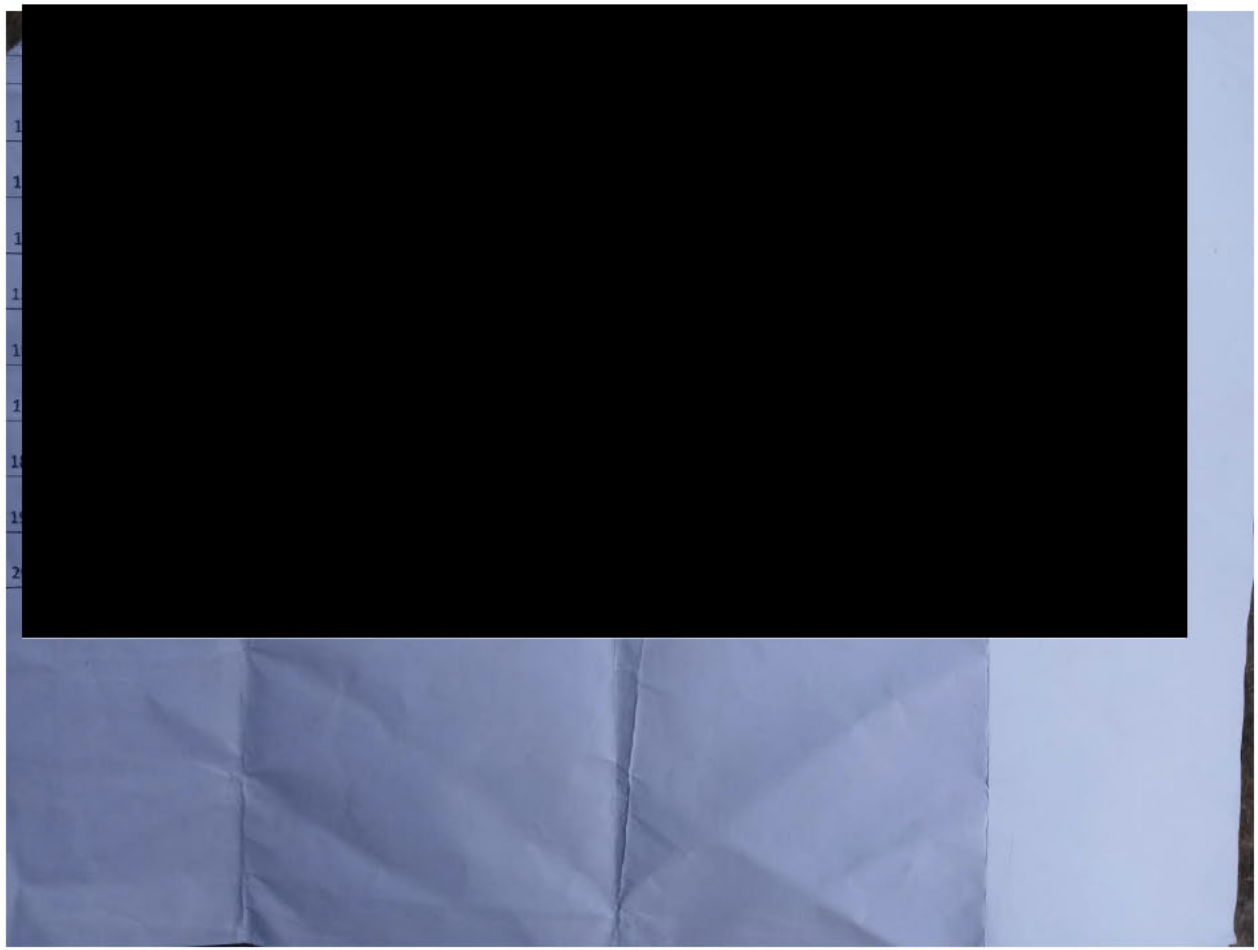
Signatures (more signatures can be sent as an attachment):

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]