

March 27, 2026

**MEMORANDUM TO THE EXECUTIVE DIRECTORS AND ALTERNATES
INTERNATIONAL BANK FOR RECONSTRUCTION AND DEVELOPMENT**

The Inspection Panel

Notice of Non-Registration on a Request for Inspection

Philippines: Support to Parcelization of Lands for Individual Titling Project (P172399)

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 March 1, 2026, the Inspection Panel (the “Panel”) received a Request for Inspection (the “Request”) related to the Philippines: Support to Parcelization of Lands for Individual Titling Project (P172399) (“SPLIT” or the “Project”). The Request was submitted by two individuals, one residing in Australia and the other in South Cotabato, Philippines. The two Requesters identify themselves as the legal heirs of land allegedly impacted by the Project, which they claim is dispossessing them of their lawful inherited land. The Request asks that their identities be kept confidential. A redacted copy of the Request for Inspection is attached as Annex I.

2. The Request alleges that the SPLIT Project has not complied with Environmental and Social Standard (ESS) 5 on Land Acquisition, Restrictions on Land Use and Involuntary Resettlement since it is disregarding a 1997 order which excludes their land from the Comprehensive Agrarian Reform Program (CARP).² It also alleges non-compliance with ESS 10 on Stakeholder Engagement and Information Disclosure since the Office of the Ombudsman Mindanao attempted to dismiss their complaint, and the Provincial Legal Chief refused to respond to their formal inquiries. Further, the Request claims that the Project only conducted a “*limited*

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

² PAD, p. 8, para 6-7: CARP is a program implemented by the implementing agency, Department of Agrarian Reform, to improve the lives of small farmers by offering them land tenure security, agrarian support services and mechanisms for social justice. CARP efforts have been primarily two-fold. First, to acquire and distribute public and private agricultural land holdings to tenants, landless farmers or tillers who qualify as Agrarian Reform Beneficiaries (ARB). Second, to provide ARBs integrated support services to these small land holders including agriculture related infrastructure, technical assistance and credit.

ocular inspection” of the inherited land.

3. After conducting its initial due diligence, the Panel concluded that the Request does not meet one of the admissibility criteria for Registration. The Panel is not satisfied that Management 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 June 26, 2020, with a total cost of US\$473.56 million. Of this amount, US\$370.00 million was financed through the International Bank for Reconstruction and Development, while the Government of the Philippines and non-World Bank financing contributed US\$103.56 million, respectively. The implementing agency is the Department of Agrarian Reform (DAR).³ At the time of the receipt of the Request, the Project was still active and 62% of the committed amount had already been disbursed.⁴ The current closing date of the Project is December 31, 2027.⁵

5. The Project’s development objective is to improve land tenure security and stabilization of property rights of Agrarian Reform Beneficiaries. The Project has three components: The first supports the parcelization of collective Certificate of Land Ownership Award; The second focuses on capacity building for the central and field offices of the implementing agency, and the third supports project management, including monitoring and evaluation.⁶ 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).⁷

The Request

6. The Request alleges non-compliance with ESS 5, claiming that the Project is being implemented in a manner that dispossesses the Requesters, who are siblings, of land they claim to have inherited from their deceased father. The Request states that the 2015 CARP survey plan (PSD-12-074960), which is the basis for the SPLIT Project, disregards the 1997 Cancellation Order of the DAR Secretary excluding their land from the CARP coverage. The Request adds in its cover letter that the SPLIT Project is being “*weaponized to validate*” the 2015 CARP survey plan, which the Requesters describe as a “*falsified survey.*” The Requesters also state that they were facing “*coordinated effort[s]*” to disregard the 1997 cancellation order, including “*destruction of permanent records,*” a 2025 order with a “*fake logo,*” and “*hiding of the of the 1998 logbook*” that would have shown proof of the finality of said 1997 cancellation order.

7. The Request claims that the Project failed to comply with ESS 10 on Stakeholder Engagement and Information Disclosure. According to the Request, the Provincial Legal Chief “*refused to respond to formal inquiries*” of the Requesters. It adds that the Office of the

³ Project Appraisal Document (PAD), p. 2.

⁴ Project Portal. Accessed on March 23, 2026.

⁵ Implementation and Status Results Report, Sequence 12, p. 1

⁶ PAD, p. 12-14

⁷ PAD, p. 4.

Ombudsman Mindanao attempted to dismiss their complaint based on a fabricated “Forum Shopping” technicality, this decision was reversed and transferred to the Ombudsman Central Office in Manila.

8. Further, the Request claims that the Project only conducted a “*limited ocular inspection*” of the inherited land to avoid documenting the absence of boundary monuments. The Request also raises concerns in relation to allegations of fraud, conflict of interest, and suppression of evidence, and requests that the Board investigates the Bank’s failure to supervise this Project.

Panel’s Observation and Determination

9. In accordance with the Panel’s Operating Procedures,⁸ 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 confirms the Request was submitted by two individuals who claim to be affected by the Project. The Panel further notes that, at the time of submission of the Request, the Project disbursed 62% of the committed financing and its closing date is on December 31, 2027. The Panel adds that the subject matter of the Request does not concern issues of procurement, and that the Panel has not previously made a recommendation on the issues raised in the Request. During its meeting with the Panel, the Requesters stated that they had contacted the Bank’s Grievance Redress Service (GRS), which referred their concerns regarding fraud and collusion to the Bank’s Integrity Vice Presidency. They also confirmed that the issues related to the alleged non-compliance with ESS 5 and ESS 10 had not been brought to Management’s attention and indicated that they would submit another complaint to the GRS raising these relevant issues.

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

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

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Ibrahim Pam', with a stylized flourish above the name.

Ibrahim Pam
Chairperson

⁸ [Inspection Panel Operating Procedures](#) (November 2025).

Attachments

The Executive Directors and Alternates
International Bank for Reconstruction and Development

Mr. Ajay Banga, President
International Bank for Reconstruction and Development

Requesters (Confidential)

ANNEX I

REQUEST FOR INSPECTION (REDACTED)

DATE: March 1, 2026

TO: The Executive Secretary, Inspection Panel – World Bank Group

RE: URGENT / CONFIDENTIAL – Request for Inspection: SPLIT Project (P172399)

Dear Executive Secretary,

We, the legal heirs of the rightful landowner in South Cotabato, Philippines, formally submit this Request for Inspection. The World Bank-funded SPLIT Project is being weaponised to validate a 2015 falsified survey through a high-level conspiracy involving the DAR Secretary, Under Secretary, several Assistant Secretaries, and a current Civil Service Commissioner (formerly DAR Undersecretary and DARAB Vice Chairman).

The severity of the institutional capture is proven by our experience with the Office of the Ombudsman Mindanao, which attempted to dismiss our complaint based on a fabricated "Forum Shopping" technicality. This decision was summarily reversed within 24 hours after we challenged its legal basis, leading to the case's emergency transfer to the Ombudsman Central Office in Manila.

We are facing a coordinated effort to "erase" a 1997 DAR Secretary's Cancellation Order. This involves the destruction of permanent records, the manufacturing of a 2025 "Fake Logo" Order, and the hiding of the 1998 Logbook [REDACTED] including the associated Registry Return Receipts to parties copy furnished by the Certificate of Finality and Implementation Order. We request the Board to investigate the Bank's failure to supervise this project, which is currently funding the salaries of conflicted legal personnel and facilitating the "zombie" substitution of deceased persons.

Sincerely,

SUBMITTED JOINTLY BY THE [REDACTED]

[REDACTED]

I. PROJECT INFORMATION

Project Name: Support to Parcelization of Lands for Individual Titling (SPLIT)

Project ID: P172399

Borrower: Republic of the Philippines (Department of Agrarian Reform)

II. THE HARM SUFFERED (ESS5 VIOLATION)

The Bank has failed to comply with **Environmental and Social Standard 5 (Land Acquisition and Involuntary Resettlement)**. The SPLIT Project is being used to dispossess us of our lawful inheritance based on a **2015 CARP Survey Plan, Psd-12-074960 (AR)** that is a physical and legal impossibility. This survey:

- Certifies a meeting with a landowner deceased since 1976 and a tenant deceased since 2009.
- Ignores a final 1997 DAR Secretary's Order that cancelled the land from CARP coverage.

III. FAILURE IN STAKEHOLDER ENGAGEMENT (ESS10 VIOLATION)

The project's **Grievance Redress Mechanism (GRM)** has failed. The Provincial Legal Chief has:

- Refused to respond to formal inquiries (8888 CCC), citing the sub-judice rule to hide administrative fraud.
- Excluded the retired MARPO from preliminary hearings and conducted a "limited" ocular inspection to avoid documenting the absence of boundary monuments.

IV. INSTITUTIONAL COLLUSION & SYSTEMIC FRAUD

The World Bank must investigate the following Prohibited Practices:

- **Fraud:** The issuance of a 2025 "Certified True Copy" of a 1997 Order featuring an updated DAR logo that was not used by the BALA Director at the time of the alleged order.
- **Conflict of Interest:** The PARPO hired a Legal RCT Officer (private counsel for the tenant's heirs) using World Bank project funds.
- **Suppression of Evidence:** The Records Management Division is hiding Pages 72 to 73 of the 1998 Logbook (Code 39/72) with associated Registry Return Receipts, which proves the 1998 Certificate of Finality and Implementation Order was served. In addition, to determine what happened to our own copy, who intercepted it and if our own counsel participated in the fraud for failing to inform us that the 1997 DAR Secretary reached finality and cancellation of CLT should

have been implemented in 1998. When did DAR Region XI, Provincial Office and Municipal Office received their copies of the COF.

V. REQUESTED RELIEF

We request the Board of Executive Directors to:

1. Authorize an independent Forensic Audit of the 2025 "Fake Logo" Order and the 1998 Logbook.
2. Suspend Project Implementation on this specific landholding with [REDACTED] to prevent the issuance of illegal e-Titles.

Ensure the confidentiality of our identities throughout this process.

Sincerely,

SUBMITTED JOINTLY BY THE [REDACTED]

