



## Setting the Record Straight about the World Bank’s Management Action Plan for the REGROW Project in Tanzania

April 2, 2025

On April 1, 2025, the World Bank’s Board of Directors approved a Management Action Plan (MAP) in response to the findings of the Inspection Panel’s investigation into the Resilient Natural Resource Management for Tourism and Growth (REGROW) project in Tanzania. The investigation followed a complaint filed by the Oakland Institute in June 2023 on behalf of impacted communities whose lives were decimated by the expansion of Ruaha National Park (RUNAPA), which was enabled by the project. The MAP fails to address the findings of the Inspection Panel report, which highlighted the project’s flagrant violation of several operating procedures (OPs) that resulted in serious harm to local communities. To justify the inadequate MAP, the Bank has published several misleading or false statements that are debunked below.

### 1. Park Expansion

**World Bank:** *“Requesters seemed to have a fundamentally different understanding regarding the Project’s objectives, scope, and supported activities. A key point was the Requesters’ belief that the Project was responsible for the 2008 expansion of the Park’s boundaries, despite the fact that these changes were completely unrelated to the Project and occurred nearly ten years before the Project was approved.”*

**Oakland Institute:** The World Bank falsely claims RUNAPA’s expansion occurred a decade before the project began when in fact it happened during the REGROW project (2017-2024). On October 20, 2023, the government modified the existing boundaries of RUNAPA through Government Notice (GN) 754.<sup>1</sup> This expanded the park from one million to over two million hectares, nearly doubling the size established by GN 436a in 1998 that local communities had accepted.<sup>2</sup> Over 84,000 people from at least 28 villages in 10 wards did not provide their Free, Prior, and Informed Consent to the decision, as required by national law.<sup>3</sup>

In December 2007, the Tanzanian government signed GN 28, in an attempt to expand the borders of RUNAPA to absorb the Usangu Game Reserve and portions of the Usangu wetlands into the park.<sup>4</sup> It, however, did not follow proper procedures for annexing legally registered village land into a national park, which resulted in the GN 28 decision never being implemented.<sup>5</sup> The boundaries of GN 28 were therefore never enforced in the following years. Additional efforts by the Mbarali District Council and legal challenges prevented evictions and local communities remained on their lands.<sup>6</sup> The REGROW project’s Appraisal Document explicitly notes that after GN 28 was announced, an “incomplete resettlement process” was halted by “conflict and nearly

2,000 complaints against the resettlement.”<sup>7</sup> In 2020, former President John Magufuli, while visiting the district, called the decision to annex villages “a serious blunder” and promised “this will never happen”.<sup>8</sup>

It was only in 2022 – a year after Magufuli’s death – that the project financing began in earnest.<sup>9</sup> From 2022 to 2024, over US\$115 million of the total US\$150 million project budget was disbursed to government agencies, primarily TANAPA, which received 74 percent of this amount.<sup>10</sup> It is also during this period that violence and livelihood restrictions escalated.

It was only in October 2022 that the Minister of Lands, Housing and Human Settlements Development (MLHSD), Dr. Angeline Mabula, announced that five villages (Luhanga, Madundasi, Msanga, Iyala, Kilambo) with a population of 21,252 and an additional 47 sub-villages from 14 villages would be evicted – with their legal registration cancelled. The following year the park’s boundaries were changed by GN 754.

The claims made in the MAP also contradict the explicit acknowledgement made by Maninder Gill, the Bank’s Global Director for the World Bank’s Environmental and Social Framework, that the project enabled the expansion of RUNAPA.<sup>11</sup>

## 2. Involuntary Resettlement

**World Bank:** *“The Requesters, as relayed by the Oakland Institute, sought assurances that no resettlement would occur in the future, whether through official boundary changes or the revocation of prior Government Notices (GN28 and GN754). Management explained that the Bank had received written confirmation from the Government that it currently had no intention of resettling communities inside RUNAPA in the foreseeable future, but that, ultimately, such guarantees are outside the Bank’s remit following Project closure, as such decisions on resettlement are sovereign matters subject to national law.”*

**Oakland Institute:** The Bank’s management shockingly places trust in the government that there will be no resettlement while it is already well underway. Villages that the government has “promised” not to resettle have had houses marked for demolition and are being deprived of basic social services. For example, in Luhanga, construction of a secondary school has been stopped by the government, construction work for electricity expansion was halted despite posts already dug, and water projects ceased. Despite the assertions made in the MAP, none of these activities have resumed to date.

The MAP refers to several instances when the Tanzanian government violated its legal obligations during the implementation of the project, which actually caused the suspension by the Bank in April 2024. Given the government’s behavior, how are the communities expected to trust that a non-binding “written confirmation” given by the government to the Bank will protect them in the future?

Concerning the physical involuntary resettlement, Tanzania’s [National Parks Act](#) clearly states that “all human settlement (with the exception of essential TANAPA personnel, essential authorized

researchers and advisors and essential hotel or permanent tented camp employees) will be prohibited in all National Parks.” As a result of GN 754, the government considers these villages to be illegally within a National Park. Until the boundaries of the RUNAPA are officially changed, or the National Parks Act is amended, these villages are at risk of eviction.

**World Bank:** *“To Management’s knowledge obtained through field missions and exchanges with community members and the Government, no physical relocations had taken place during the life of the Project, and no evidence to the contrary was presented. Although asset identification processes had begun, that planning process was stopped by the Government after the Bank expressed concerns, and Management has not seen evidence that individuals were involuntarily displaced.” “In July 2024, Management received reports of confirmation by government officials, in newspaper articles and video clips from Tanzania’s national news outlets, that the communities inside RUNAPA were not being resettled and could continue with their livelihood activities.”*

**Oakland Institute:** The MAP ignores the finding made by the Panel’s report that restriction of access represents involuntary resettlement for community members living within and adjacent to the Park whose livelihoods are based on farming and grazing livestock. According to the Bank’s Resettlement Policy Framework, “involuntary resettlement” not only refers to the physical displacement of homes, but also includes economic displacement, which is clearly the case for local communities who have been barred from farming and grazing for over three years. The assertion that resettlement will not happen therefore denies the reality on the ground, where economic displacement has already happened. The Resettlement Policy Framework states that if physical or economic displacement cannot be avoided, displaced persons (including those who have lost access to the land) are compensated at the replacement cost for land and other assets and otherwise assisted as necessary to improve or at least restore their incomes and living standards.<sup>12</sup> Despite this clear obligation, no reparations for loss of land, cattle seizures, and farm closures have been included in the MAP.

“Reports of confirmation by government officials” and media “that the communities inside RUNAPA were not being resettled and could continue with their livelihood activities” are simply false. It only takes a visit to the area to confirm that livelihood activities have been stalled for three years.

### 3. Alternative Livelihoods

**World Bank:** *“Unfortunately, the Requesters, as relayed by the Oakland Institute, did not engage in discussing the detailed and extensive livelihood support offered through the two new projects (the proposed Trust Fund and IDA projects) and the ongoing local consultation process with the communities as part of the design of these projects. Management invited feedback several times on ways to strengthen these initiatives to respond to the Requesters’ livelihood support needs. The final message that Oakland Institute communicated on February 7, 2025, was that the communities would not be “interested in alternative livelihoods.” Management maintains that providing livelihood support is the most effective way to address the underlying causes of illegal access to the park, illegal grazing, and the resulting confrontations and cattle seizures.”*

**Oakland Institute:** The “alternative livelihood” activities put forward by the MAP were not specifically designed to address harms that farmers and pastoralists have suffered as a result of the project. They fail to match the scale of the problem as over 84,000 people are now considered inside a national park and banned from farming or grazing cattle. The Bank shamefully suggests that activities such as micro-finance, community forestry, clean cooking, and honey production supported by the MAP will successfully match incomes obtained through farming and pastoralism. Reverting the park boundaries and allowing these communities to resume their primary livelihoods is the only way to address the situation.

#### 4. Compensation for Farmers

**World Bank:** *“The Requesters, as relayed by the Oakland Institute, demanded US\$ 66 million in compensation for farmers who alleged that they could not cultivate their lands over the past two years. Absent a specific Panel finding, it remains unclear whether and to what extent these farmers’ livelihoods may have been affected by the Project or instead by the 2008 extension of RUNAPA boundaries which predates the Project. The Requesters, as relayed by the Oakland Institute, declined Management’s request for details regarding these claims.”*

**Oakland Institute:**

The Livelihood restrictions enforced by TANAPA rangers that the project overlooked have decimated these communities. Thousands of farmers have been barred from farming by the government. For 551 members of two farmer associations stopped from cultivating rice over the past three years, the economic loss is over US\$66 million. The Bank never asked requestors for “details regarding these claims.” The requestors actually provided the Bank with a detailed breakdown of this calculation (acres left uncultivated, average yield of rice per acre, price of rice sold) but were continually ignored by management who stated in calls with the Oakland Institute that they were not aware of the rice farming in the area or even the existence of these farmers associations.

The requesters never demanded US\$66 million in compensation but shared with the World Bank their initial conservative estimate of the economic damage for just two farmer associations. Estimating the actual damages caused by the project would require a thorough assessment with these associations and other affected farmers, which was not been done but is required as per the obligations set by the Bank’s Resettlement Policy Framework mentioned above.

#### 5. Compensation for Herders

**World Bank:** *“The Requesters, as relayed by the Oakland Institute, also reiterated their demand for compensation (ca. US\$ 6.5 million) for herders and others affected by cattle seizures. Management clarified that the MAP includes measures to provide access to legal information to support the pursuit of such claims under national law, but that the Bank MAP is not in a position to assess the scope or legality of such seizures or provide compensation for such losses.”*

**Oakland Institute:** The Bank is willfully ignoring the absence of the rule of law in Tanzania though it has been extensively documented in the complaint and in several communications with the Bank since 2023. In many cases, herders have tried to take their cases to court which have failed to provide justice. Legal actions often require payment of bribes and even when court decisions are favorable to villagers, they are routinely not enforced.<sup>13</sup> In several court cases reviewed by the Institute, pastoralists and farmers have won legal cases on livelihood restrictions but their cattle have not been returned nor have they been permitted to return to their farms.<sup>14</sup> It is extremely unlikely that community members will be able to hold rangers responsible for abuses in court as the Bank suggests. In light of reality on the ground, the offer for legal aid to impacted villagers in the MAP offers no relief to impacted communities who have faced violent atrocities from World Bank-funded rangers.

As for farmers, the requesters never demanded US\$6.5 million in compensation but shared with the World Bank their initial conservative estimate of the economic damage for a number of herders they could identify. Again, estimating the actual damages caused by the project would require a thorough assessment for all herders in the area, which the Bank did not do but is required as per the obligations set by the Bank's Resettlement Policy Framework mentioned above.

## 6. TANAPA's Human Rights Abuses

**World Bank:** *“The Borrower will convene a workshop with development partners, including the Bank, to discuss international good practice on park management, including participatory approaches to balance conservation with support for community livelihoods. This will further inform policies and practices applicable to park management in Tanzania, including best practices relating to the use of force hierarchy; conflict avoidance; and community engagement and benefit sharing. The Bank will support the Borrower, in collaboration with other development partners, to convene this workshop to discuss relevant good international practice on protected area management including on effective and responsible enforcement of restrictions; conflict avoidance, community engagement and benefit sharing.”*

**Oakland Institute:** Management acknowledged a “key weakness of the project design” was that the project “did not sufficiently consider that, by supporting TANAPA's patrolling capacity, it contributed to an increased risk of conflict as well as involuntary resettlement arising from restriction of access to legally designated parks.” Over the course of the project, at least 11 individuals were killed by police or rangers, five forcibly disappeared, and dozens suffered physical and psychological harm, including beatings and sexual violence. The project provided the rangers with 21 different types of equipment to strengthen their patrolling capacity in the project area to reduce or eliminate illegal activities. While this did not include firearms, it did provide bush knives that the Panel found could potentially have been used to burn or strip naked Maasai women who were beaten by the rangers in a May 2023 incident. Instead of providing redress to victims of the violence the Bank directly financed, it shockingly proposes this “workshop” – a slap in the face to those who have suffered the devastating loss of loved ones.

## 7. Consultation for the MAP

**World Bank:** *“The consultations were significantly affected by the Requesters’ preferred mode of engagement in the process. While Management made repeated offers to meet with the Requesters in person or virtually in a format preferred by them to preserve their confidentiality and address their retaliation concerns, the Requesters chose to rely on their advisors. While respecting this choice, Management continued to propose multiple mechanisms to allow the Requesters to participate anonymously, but these options were deemed unacceptable by the Requesters. The Requesters also declined the opportunity to directly share with the Bank through the Panel (thereby preserving their anonymity) written feedback on the proposed MAP. All written submissions that the Bank received were sent by Oakland Institute.”*

**Oakland Institute:** The “consultation” process to create the MAP has been a complete sham – ignoring the feedback and demands of the affected people, which was reiterated to management on several occasions. In December 2024, the requestors met with many villages impacted by the project to discuss the MAP. They gathered feedback of the villagers in addition to the specific numbers of farms impacted, cattle seized and violence suffered from TANAPA. Community members were unanimous and clear: they strongly rejected the draft MAP because it did not consider any action about the park’s new boundaries established under the REGROW project, which is the core cause of their suffering. At the end of December, the communities sent a detailed breakdown of the harms caused by the project and their demands to the Bank’s management.

Directly contradicting the Bank’s statement that all communication was through the Institute, on January 31, 2025, the requestors sent management a follow up detailed response through the Inspection Panel to reiterate their concerns with the MAP. A member of the Inspection Panel confirmed this was forwarded to management the same day. To access internet, requestors had to travel for hours, making management’s incessant requests for video calls impractical. Once management made it clear the community demands would be ignored in the MAP, they saw no reason spending time discussing it with them. On March 10, 2025, the requestors sent a letter to the Inspection Panel with the subject: “Our Demands are Being Ignored,” to share frustrations with management’s efforts to check a box on consultations.

In meetings with the Oakland Institute, Bank’s Management claimed they had been consulting communities about the MAP and would share details like the villages visited and responses from communities. Two Stakeholder Consultation Summary reports (for projects P502536 and P180742) were shared with on January 12, 2025. The reports are explicit that the scope of both consultations did not consider the REGROW project, the expansion of the park or the findings of the Inspection Panel report. Only one of them claimed that the concerned communities were consulted, in a sub village and a village, out of over 28 affected villages.

## References

<sup>1</sup> *Public Government Gazette*. October 20, 2023. [https://www.utumishi.go.tz/uploads/documents/sw-1698314727-GAZETI%20LA%20TAREHE%2020%20OKTOBA,%20%202023\\_compressed.pdf](https://www.utumishi.go.tz/uploads/documents/sw-1698314727-GAZETI%20LA%20TAREHE%2020%20OKTOBA,%20%202023_compressed.pdf)

<sup>2</sup> *Government Notice 436A of 1998*. July 31, 2002. <https://tanzlii.org/akn/tz/act/gn/1998/436a/eng@2002-07-31>

<sup>3</sup> *Parks Act*. July 1, 1959. <https://tanzanialaws.com/n/239-national-parks-act>

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- <sup>4</sup> The Oakland Institute. *Unaccountable & Complicit: The World Bank Finances Evictions & Human Rights Abuses in Tanzania*.
- <sup>5</sup> International Working Group for Indigenous Affairs. *Tanzanian Pastoralists Threatened: Evictions, Human Rights Violations and Loss of Livelihoods*. 2016. [https://www.iwgia.org/images/publications/0727\\_Report\\_23\\_Tanzania\\_for\\_eb.pdf](https://www.iwgia.org/images/publications/0727_Report_23_Tanzania_for_eb.pdf)
- <sup>6</sup> The Oakland Institute. *Unaccountable & Complicit: The World Bank Finances Evictions & Human Rights Abuses in Tanzania*.
- <sup>7</sup> The Inspection Panel. *Investigation Report: United Republic of Tanzania – Resilient Natural Resource Management for Tourism and Growth (P150523)*. September 16, 2024.
- <sup>8</sup> Global TV Online YouTube. “JPM Awauliza wana Mbarali, mpewe nini Waziri Jafo apewa Zigo Zito.” May 2, 2019. <https://www.youtube.com/watch?v=EJKU-U8MvXE>
- <sup>9</sup> Magufuli died in March 2021 and the closest available “Implementation Status & Results Report” was published in June 2021. The World Bank. *Implementation Status & Results Report*. June 29, 2021. <https://documents1.worldbank.org/curated/en/678591624998855395/pdf/Disclosable-Version-of-the-ISR-Tanzania-Resilient-Natural-Resource-Management-for-Tourism-and-Growth-P150523-Sequence-No-08.pdf>
- <sup>10</sup> The World Bank. *Disclosable Restructuring Paper - Tanzania: Resilient Natural Resource Management for Tourism and Growth - P150523*. *Op. Cit.*; The United Republic of Tanzania Audit Office. *Resilient Natural Resource Management for Tourism and Growth Project – Report of the Controller and Auditor General on the Financial Compliance Audit for Fiscal Year Ended 30 June 2024*. <https://documents1.worldbank.org/curated/en/099013025073058542/pdf/P1505231613f2c0fc1b66014b10de2ddcdb.pdf>
- <sup>11</sup> Video call with the Oakland Institute, January 3, 2025.
- <sup>12</sup> Tanzania Ministry of Natural Resources and Tourism. *Resettlement Policy Framework for the Resilient Natural Resources Management for Tourism and Growth Project*. August 3, 2017. <https://documents1.worldbank.org/curated/en/429511501869554181/pdf/SFG3539-RP-P150523-Box405294B-PUBLIC-disclosed-8-4-17.pdf#page=27> (accessed January 12, 2023).
- <sup>13</sup> Direct communication, name withheld. December 4-7, 2024.
- <sup>14</sup> *Ibid*.