ACCOUNTABILITY NOW

TANZANIAN COMMUNITIES SHATTERED BY WORLD BANK-FUNDED TOURISM PROJECT





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This report was authored by Andy Currier and Frédéric Mousseau. It is based on field research conducted in collaboration with a team of researchers in Tanzania, who remain unnamed to ensure their safety.

The views and conclusions expressed in this publication are those of the Oakland Institute alone and do not reflect opinions of the individuals and organizations that have supported the work of the Institute.

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Front Cover: Women threatened by RUNAPA's expansion in Mbarali District © The Oakland Institute

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The Oakland Institute, 2025



EXECUTIVE SUMMARY

Launched in 2017, the World Bank's US\$150 million Resilient Natural Resource Management for Tourism and Growth (REGROW) project was established to increase tourism in the southern region of the country through the "development" of four protected areas. The project allocated funding to the Tanzanian government to massively expand one of them, Ruaha National Park (RUNAPA), from one to over two million hectares.

This financing provided material resources to the governmental paramilitary agency, Tanzania National Parks (TANAPA), for the equipment and operations of its rangers. In recent years, these operations have consisted of an aggressive campaign to terrorize and oppress local communities with the goal of chasing them away from their land. To remove all human presence from within the new boundaries of the park, rangers have committed egregious violence, including sexual assaults, torture, and even extrajudicial killings and forced disappearances; barred farmers from cultivating their land and conducted large-scale cattle seizures from herders. Economic damages for farmers and pastoralists impacted by livelihood restrictions run in the tens of millions of dollars.

Abuses committed by TANAPA and the expansion of the park blatantly violated the World Bank's operating procedures, which borrowing governments are required to follow. The expansion plan for RUNAPA was made official on October 20, 2023, when the government declared it was modifying the existing boundaries of the park through Government Notice (GN) 754. Over 84,000 people from at least 28 villages in 10 wards, affected by abuses, forced evictions and livelihood restrictions, were never consulted about the plan or compensated for its impact.

In June 2023, local communities filed a case at the Bank's independent Inspection Panel about harms caused from the REGROW project. On September 16, 2024, the Panel submitted its investigation report to the Bank's Board of Directors and the Bank's management. The report highlighted how the World Bank failed to identify and act upon the flagrant violation of several operating procedures that resulted in serious harm to communities living within the project area. It also documented significant failures of the Bank from the inception of the project and during its implementation, which enabled the expansion of RUNAPA while allowing material support to rangers responsible for human rights abuses and livelihood restrictions.

When initially informed of the abuses and violations of its own safeguards in April 2023, the World Bank did not take action and disbursements to the project continued unabated for a full year. The failure of the Bank to act sooner despite conclusive evidence of the harms it was causing allowed cattle seizures and farm closures to continue draining family savings, kept children out of school and let TANAPA rangers murder more people with impunity. In April 2024, disbursements were finally suspended as a result of Tanzania's noncompliance with Bank safeguards before the project was cancelled seven months later in November.



After nearly two years of steadfast advocacy by the Oakland Institute, the cancellation marked a landmark victory for courageous Tanzanian villagers. Communities, however, remain under siege – still facing evictions, crippling livelihood restrictions, and extrajudicial killings, which were put in motion and directly enabled by the Bank's financing. In a drastic turn from its initial defense of the project, the Bank has finally acknowledged its grave failure around the REGROW project, recognizing "weaknesses in the project design, preparation, implementation, and Bank supervision."

In response to the damning findings of the Inspection Panel, the Bank took the rare decision to set up specific funding to provide redress to affected communities through two new projects (amounting together to US\$112.8 million). However, these two projects, central elements of a Management Action Plan (MAP) proposed by the Bank, focus on support for "alternative" livelihoods and fail to address the past and ongoing harms it enabled.

Impacted communities rejected the proposed MAP and instead, delivered a list of demands to the Bank that included reverting park boundaries to the 1998 borders they accepted, reparations for livelihood restrictions, the resumption of suspended basic services, and justice for victims of ranger abuse and violence.

On April 1, 2025, ignoring these demands and the severity of the Panel's findings, the World Bank's Board of Directors approved the MAP. The promises from the government included in the MAP – that villages located within the expanded park boundaries would not be resettled and livelihoods could resume – were quickly broken. Between April and May 2025, two young villagers were murdered by TANAPA rangers while over 1,000 cattle were seized. Farmers have not been permitted to cultivate their lands for the third straight year as they struggle to make a living.

The government's failure to abide by commitments made in the MAP must compel the World Bank to take decisive action to hold itself accountable to the communities affected by its financing and address their demands. Local communities are determined to continue the struggle for their rights to land and life until the Bank finally takes responsibility and remedies the harms it caused.



PROLOGUE

Villagers living in the shadow of Ruaha National Park remain under siege from a rogue, World Bank-funded, paramilitary ranger force.

On April 26, 2025, six fishermen were confronted by a TANAPA platoon outside of a village in the Ihefu Basin. Terrified, the group quickly tried to escape. As they fled, 27-year-old Hamprey Mhaki was shot in the back of the shoulder. It is believed that Mr. Mhaki succumbed to his gunshot wound, as when the search party returned the following day to where he was last seen in custody, they only found a large amount of blood. He remains missing - while his pregnant wife and grieving family search for answers and demand justice.1

Just days later, on May 7, 2025, a group of herders and their cattle in Iyala village were surprised by a low-flying TANAPA helicopter that opened fire with live ammunition.² A group of rangers on the ground quickly confronted the herders who had been promised the freedom to graze their cattle despite the recent park expansion. Eyewitnesses report that Kulwa Igembe, a 20-year-old Sukuma herder, was then shot at close range in the chest by one of the rangers. He died at the scene and is survived by his widow and young daughter. Over 1,000 cattle belonging to several herders were seized and impounded at the Madundasi ranger post following the attack. Approximately 500 cattle have been reclaimed after herders paid TSh100,000 per head [US\$41] in fines - delivering a substantial financial blow.



These murders and cattle seizures shattered hope for communities that their nightmare would be over after the World Bank committed to address the harms it had caused through its REGROW project. The Bank's Action Plan (MAP) hinged upon a dubious promise from the government that there would be no resettlement "in the foreseeable future" for communities inside the park who would be allowed to resume their livelihood activities – like grazing, fishing, and farming – without being attacked, robbed, and killed by rangers. Today, cattle are still being seized by the hundreds and farmers are still banned from cultivating their fields.

On May 13, the Oakland Institute published an urgent alert about the incidents. The Tanzanian government then announced it had launched an investigation after placing four rangers into police custody.³ TANAPA in its PR operation, however, denied responsibility for the killings and did not address the key issue at stake, i.e. the breach of the government's promise that livelihood activities could continue in the park.

The Bank announced on April 2, 2025 that it will supervise the implementation of the MAP. Two weeks after being alerted by the Institute, the Bank's management responded: "We are deeply concerned by these reports of violence. As you are aware, the REGROW project was cancelled in November 2024, and the World Bank no longer finances activities in the Ruaha National Park. However, we continue to engage the Government of Tanzania for the implementation of the Management Action Plan (MAP), which includes support for community livelihoods, improved access to legal aid, and strengthened grievance redress mechanisms to ensure that concerns can be raised safely and confidentially. We understand that the incidents reported are under investigation by the Tanzanian authorities."4

Local communities were shocked to learn that the Bank was thus evading its responsibility to supervise the implementation of the MAP by relying on the government responsible for perpetrating the violence to investigate the killings. Given the absence of the rule of law in Tanzania, impacted communities have no hope they will receive justice.



INTRODUCTION

Tourism is booming in Tanzania as the government continues to implement drastic plans to attract five million tourists with the objective to bring in US\$6 billion from the sector annually by 2025.⁵ Towards this goal, "protected areas" are being created, with Indigenous and local communities bearing the cost as they face evictions, human rights abuses, and livelihood restrictions.

Located in the Southern Highlands of Tanzania, the Usangu wetlands in the Mbarali District feed the nearly 300 milelong Great Ruaha River, which plays a vital role in supporting a rich diversity of wildlife.⁶ For centuries, the area has also supported pastoralist and smallholder farmer livelihoods.⁷⁸ In recent years, the flow of the river has decreased with government plans to expand tourism and hydroelectricity, intensifying competition over the wetlands and river.⁹

The state has constrained communities' access to land and water, which has undermined their livelihoods and left tens of thousands disenfranchised. Evidence, however, shows that small farmers and pastoralists are not responsible for the river's degradation or reduced energy generation.¹⁰ Despite these findings, local communities have borne several attempts to drive them from the area.¹¹ Today, pastoralists and small farmers in the Great Ruaha River basin are suffering from plans to massively expand RUNAPA – enabled by a World Bank-financed tourism development project. In September 2017, the Bank launched the REGROW project through a US\$150 million International Development Association (IDA) credit to Tanzania. The objective of the eight-year project¹² was to "improve management of natural resources and tourism assets in priority areas of Southern Tanzania and to increase access to alternative livelihood activities for local communities."¹³ The Ministry of Natural Resources and Tourism (MNRT) and TANAPA served as the two primary implementing agencies.¹⁴

In December 2022, villagers whose lives had been upended by the government's plan to expand the park sought support from the Oakland Institute to help defend their lives and livelihoods. Since then, the Institute has served as an advisor to the affected villagers as they navigated the Bank's independent accountability mechanism through a complaint made to the Inspection Panel in June 2023. In September 2023, the Institute released *Unaccountable & Complicit*, which shattered the silence on the Bank's responsibility for the horrors unfolding to expand RUNAPA.¹⁵ The Panel launched its investigation in November 2023 and delivered its report in September 2024.¹⁶



When first informed of the serious harms caused by the project in April 2023, the Bank failed to act and continued disbursements. After a year of advocacy amidst deteriorating conditions, it finally made the decision to suspend disbursements in April 2024, citing the Tanzanian government's non-compliance with safeguards.¹⁷ In November 2024, the project was officially cancelled.

Despite acknowledging serious harms caused, the Bank has attempted to shirk its responsibility to redress the past and ongoing suffering it has inflicted. This report details the impact of RUNAPA's expansion on over 84,000 lives – enabled by the REGROW project – and the Bank's failure to remedy the harms.



"We are crying for our lands...let us be free. We don't want to leave and the World Bank should stop the government from taking our lands. Our suffering is directly because of the Bank. Let us be free."

- Farmer, Mwanavala village



TIMELINE

2017

September – The World Bank approves the REGROW project.

2022

October – The Tanzanian Minister of Lands proclaims that five villages and 47 sub-villages home to 21,252 people will be evicted.

December – Communities facing evictions and human rights abuses seek support from the Oakland Institute.

2023

April – The World Bank dismisses information from the Institute about the violation of its safeguards and continues financing the project.

June – The Institute submits a request for inspection to the Inspection Panel.

September – The Institute releases Unaccountable & Complicit, documenting abuses and evictions enabled by REGROW.

The Panel submits its eligibility report and recommends an investigation into the project.

October – The government officially expands RUNAPA through Government Notice (GN) 754.

November – The World Bank's Board of Directors approves the investigation. Villagers call on the Bank to suspend project financing.

December – The Inspection Panel launches its investigation.

2024

February – A petition signed by over 81,000 people calls on the Bank to stop funding the project.

April – The World Bank suspends disbursements for the project after US\$33 million was provided since the request for inspection was filed.

September 16 – The Inspection Panel submits its report to the Bank.

October – Nine UN Special Rapporteurs write to the Bank and government raising questions and concerns with the REGROW project.

November 6 – REGROW is cancelled.

November 26 – The Bank shares a draft Management Action Plan (MAP) with the Institute.

December – Requestors and the Institute conduct extensive consultations about the MAP with impacted communities.

2025

January – Requestors reject the proposed MAP and send a list of demands to the World Bank from the communities.

April 1 – The Board of Directors approves the MAP previously rejected by communities.



VIOLATIONS OF THE BANK'S SAFEGUARDS & OPERATING PROCEDURES

The World Bank's Operating Procedures (OPs) are designed to "ensure that the people and the environment are protected from potential adverse impacts" of its projects.¹⁸ These procedures require borrowing governments to address environmental and social risks before receiving World Bank support and during the implementation of the projects.

As part of the Involuntary Resettlement Policy (OP/BP 4.12), the Bank's projects require the preparation of contingency plans as detailed in the Resettlement Policy Framework (RPF). In the case of the REGROW project, if evictions and resettlement are considered, the safeguards stipulate that the government would first need to prepare and implement a Resettlement Action Plan and that it would be required to follow "international best practice with regards to land acquisition and resettlement."¹⁹ The Bank would then "provide technical assistance and MNRT will receive WB review, comment and approval prior to implementing any resettlement activities."²⁰ Additionally, the safeguards require public consultation meetings in the affected villages with relevant stakeholders.

The Environmental Assessment Policy (OP/BP. 4.01) requires proper assessments for a project to ensure it will be environmentally sound and sustainable. As part of this requirement, the Bank must also "take into account human health and safety and the institutional capabilities related to the environmental and social aspects" of a project.²¹ "OP/BP 4.12 stipulates that where project impacts include physical relocation, measures should be taken to ensure that the displaced persons are: (i) provided with assistance (such as a moving allowance) during relocation and (ii) provided with residential housing, or housing sites, or, as required, agricultural sites for which a combination of productive potential, location advantages, and other factors are at least equivalent to the advantages lost.

OP/BP 4.12 requires that the resettlement plan or policy include measures to ensure that the displaced persons are (i) offered support after displacement for a transitional period, based on a reasonable estimate of the time likely to be needed to restore their livelihood and standard of living and (ii) are provided with development assistance in addition to compensation measures, such as land preparation, credit facilities, and training or job opportunities.

OP/BP 4.12 requires that displaced persons are (i) informed about their options and rights pertaining to resettlement and (ii) consulted on, offered choices among, and provided with technically and economically feasible resettlement alternatives."

- REGROW Resettlement Policy Framework



Projects also must abide by the broader conditions outlined in the Bank's Investment Policy Financing (IPF) framework. These include requirements for the Bank to analyze aspects of a project's design, including the capacity of the borrowing government and any agencies that will be implementing the project in addition to other "economic, fiduciary, environmental, social considerations, and related risks."²² The IPF framework is also supposed to ensure proper monitoring and evaluation of the project.

On April 5, 2023, the Oakland Institute sent a letter to the World Bank sharing serious concerns regarding evictions, livelihood restrictions, and human rights abuses committed by TANAPA within the REGROW project area. After the Bank failed to acknowledge and take action to address these issues, the Institute filed a request for inspection on behalf of impacted communities to the Bank's independent Inspection Panel on June 20, 2023. Given fear of retribution, only two requestors signed the complaint and remained anonymous, with the Oakland Institute serving as the advisor.

The request for inspection detailed how the project was in violation of several OPs, including: Environmental Assessment (OP/BP 4.01), Indigenous Peoples (OP/BP 4.10), and Involuntary Resettlement (OP/BP 4.12). On July 20, 2023, after conducting an eligibility investigation, the Panel registered the request for inspection. On September 19, 2023, it recommended an investigation into "whether a) the Bank conducted sufficient due diligence regarding the capacity and processes of one of the Project's lead implementing agencies [TANAPA], b) risks to communities were identified in project documents, c) appropriate mitigation measures were put in place, and d) the Bank's supervision of the Project's implementing agencies was adequate."²³

Despite the presence of Indigenous Maasai and Datoga pastoralists in the project area for decades, the Panel did not recommend an investigation into whether the project violated OP 4.10 regarding Indigenous Peoples. The Bank's requirement for people to be considered Indigenous is a "collective attachment" to an area, defined as "for generations there has been a physical presence in, and economic ties to, the lands and territories traditionally owned, or customarily used or occupied, by the group concerned..."²⁴ The Panel considered that the Maasai and Datoga did not qualify for this protection.

This omission ignored that the Maasai and Datoga were displaced from their ancestral lands during colonial times and in the course of expansion of national parks since. Several communities threatened by the current expansion of RUNAPA were resettled where they live today during the previous expansion of the park that occurred in 1998. In the 1950s, the Maasai came to the area along the Great Ruaha River while the Datoga followed in the 1970s.²⁵ Stripping these communities of their Indigenous identity on the basis of past displacement severely undermines the Bank's supposed commitment to protecting these groups and violates the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).²⁶ While it voted in favor of UNDRIP in 2007, Tanzania does not recognize the presence of Indigenous Peoples in the country.²⁷



"Why is the World Bank financing tourists to see wildlife at our expense?"

- Pastoralist, Iwalanje village

Overlooking the government's publicly announced eviction plans, the Panel also initially "determined that no resettlement was taking place in the Project area, and it was not possible to establish a plausible link between the alleged or potential harm resulting from resettlement and the Project." Following continued advocacy, this omission was remedied with involuntary resettlement added to the investigation's scope in May 2024.²⁸

On September 16, 2024, the Inspection Panel submitted its report to the Bank's Board of Directors. Only after an advocacy campaign did the Oakland Institute and requestors receive a copy the following month – a departure from standard practice that shockingly does not permit communities to access the full report at this stage and creates a dangerous information asymmetry. The report highlighted the World Bank's flagrant violation of several OPs, including Environmental Assessment (OP/BP 4.01), Involuntary Resettlement (OP/BP 4.12) and the IPF that resulted in "serious harm" to communities living within the REGROW project area. The following sections discuss the Panel's findings related to evictions, livelihood restrictions and human rights abuses, and the ongoing harms caused by the project.

INDEPENDENT PANEL CONFIRMS COMMUNITIES' CLAIMS

REGROW Project Enabled Park Expansion

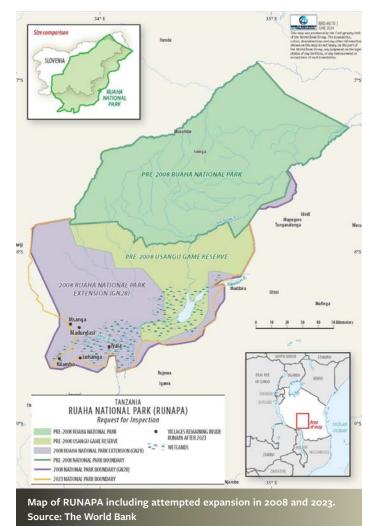
The Tanzanian government has sought to expand tourism and hydroelectricity production in the Great Ruaha River Basin for decades, undermining the rights and livelihoods of local communities.²⁹ While several previous attempts to expand RUNAPA and drive local communities from the area failed, financing through the REGROW project enabled the government to move ahead with widespread eviction plans.

On October 20, 2023, the government officially modified the existing boundaries of RUNAPA through Government Notice (GN) 754.³⁰ The decision expanded the park to over two million hectares, doubling the size established by GN 436a in 1998 that local communities had accepted.³¹ Over 84,000 people from at least 28 villages in 10 wards (Table 1) did not provide their Free, Prior, and Informed Consent to the decision, as required by national law.³² They now face forced eviction as Tanzanian law forbids permanent settlement and livelihood activities within national parks.³³

"Three key risks - resettlement, law enforcement and conflicts, and livelihood restrictions - were underappreciated during Project preparation and supervision...it is clear there were critical failures of the Bank in the planning and supervision of this Project and that these have resulted in serious harm."

- The World Bank Inspection Panel Report, September 2024

While the World Bank claims RUNAPA's expansion occurred a decade before the project began, the park's expansion was formalized and enforced only during the REGROW project. In December 2007, the government signed GN 28, expanding the borders of RUNAPA to absorb the Usangu Game Reserve and portions of the Usangu wetlands into the park.³⁴ 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.³⁵



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.³⁶ 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."³⁷ 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," at a public rally.³⁸

It was only in 2022 – a year after Magufuli's death – that the project financing began in earnest, with marginal disbursements, representing no more than 6 percent of the total project budget, spent prior to that time.³⁹ 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.⁴⁰ It is during this period that livelihood restrictions and violence escalated as material support provided by REGROW increased the government's enforcement capacity.





Ancestral burial ground in Iwalanje village, now within RUNAPA

"Where are we going to go? We depend on our cattle, where can we go with them? Our grandfathers were living here and died here. But now they are saying that we have to leave? Why?"

- Maasai woman, Vikaye village

In October 2022, the Minister of Lands, Housing and Human Settlements Development (MLHHSD), 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. She warned locals, "If you continue to be there and the village is delisted, it means you are breaking the law."⁴¹ A major conclusion of the Inspection Panel's report is that the Bank "did not adequately identify the extent of human settlement within the southern part of RUNAPA, i.e. all the villages in the Park as a result of GN-28 and GN-754 [and] that the Project is not in compliance with OP 4.01, paragraph 3, for not sufficiently considering the social risks in the southern part of RUNAPA, including the risk of resettlement."⁴² In response to the report, the Bank's management admitted there was "no clear basis" for the Bank to assume that resettlement of villages from RUNAPA was unlikely throughout the life of the project.⁴³ The Panel found that "resettlement activities were underway without its use or the application of other Bank Involuntary Resettlement Policy provisions relating to physical resettlement," in violation of OP 4.12, paragraph 3(a).⁴⁴

The World Bank's Inspection Panel's report exposes how the Bank overlooked the eviction plans within the project area and "failed to take action concerning the ongoing risk of resettlement," despite numerous opportunities. The Bank's management has openly acknowledged that the institution "should have taken notice of some incipient resettlement activity as early as April 2023, when the Oakland Institute's letter to the Bank referred to the MLHHSD Minister's October 2022 speech indicating a plan to pursue resettlement in the Project area."⁴⁵ In October 2023, the Bank was copied on a letter sent by the Tanzanian government stating that it had begun the early stages of a resettlement process for several villages within the project area.⁴⁶ Despite these clear indications and the failure of the government to abide by the Bank's resettlement safeguards, the project disbursements continued.

In March 2024 – 11 months after first being made aware of the eviction threat – the Bank's management visited the villages in southern RUNAPA for the first time. During this overdue visit, the Bank's officials saw that resettlement activities had begun while the government had still not "applied the provisions of the RPF [Resettlement Policy Framework] in the preparatory steps as required."⁴⁷ This, coupled with the lack of proper grievance mechanisms, triggered the suspension of disbursements in April 2024.

"[The Bank] did not adequately identify the extent of human settlement within the southern part of RUNAPA, i.e. all the villages in the Park as a result of GN-28 and GN-754...The Project is not in compliance with OP 4.01, paragraph 3, for not sufficiently considering the social risks in the southern part of RUNAPA, including the risk of resettlement."

> - The World Bank Inspection Panel Report, September 2024

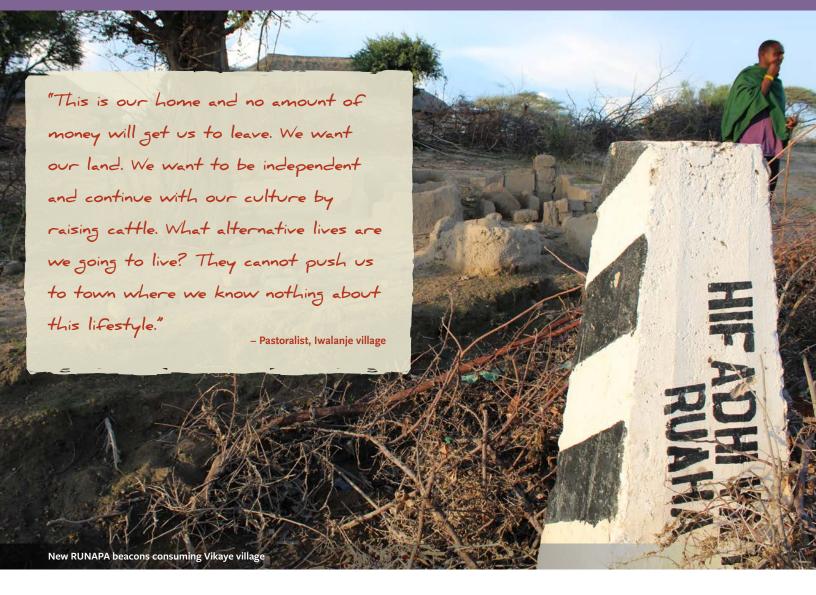
Widespread Displacement

The Tanzanian government and the World Bank failed to provide an accurate assessment of the exact number of impacted villages, sub-villages, and people considered living inside RUNAPA under GN 754. While TANAPA reported to the Inspection Panel that only five villages (Msanga, Madundasi, Kilambo, Luhanga, Iyala) are located inside GN 754's boundaries, the actual number is much higher.

Table 1. Villages fully or partially located within RUNAPA's borders established by GN 754

Ward	Village (alternative names/spelling)	Sub-villages	Estimated population inside RUNAPA
Imalilo- Songwe	Warumba Ibumila Imalilo-Songwe Mwanavala	Zimanimoto	5,719
Itamboleo	Kapunga Itamboleo Mbalino	Mpungam- moja	4,849
Mapogoro	Ukwavila	Ivaji Makondeko Ifushiro	9,438
Rujewa	Nyeregete	Magwalisi	8,398
Utengule	Muungano Simike	ltambo Mpolo Mapululu Mapula	8,406
Mwatenga	Kilambo	Mapara	6,278
Igava	Ikanutwa Vikaye (Vikae) Igunda Iwalanji (Ivalanji)	Mapelema Maguna	4,764
Luhanga	Msanga Luhanga Madundasi Iyala		25,000
Miyombweni	Myombweni Magigiwe Nyakazombe	Kinyaguru Mnyelela Makindi	2,454
Madibira	Mkunywa Nyamakuyu Nyakadete Mahango Iheha	Mlonga Kamisi Salugona Mapinduzi Amani	9,516
10 wards	28 villages		84,822 people

The total number of people in these 28 villages across 10 wards located inside the expanded park is at least 84,822. There are likely other villages partially inside the park in addition to those listed in Table 1 – including some in other districts outside Mbarali that are not included in the figure above.



The presence of more than five villages inside the expanded park is further corroborated by the ongoing legal action undertaken by local communities against the government. In January 2023, 852 smallholder farmers from Mbarali District filed a case (Land Case No. 15 of 2023) at the High Court of Tanzania in response to the October 2022 eviction announcement made by Minister Mabula. In November 2023, the applicants requested to be allowed to continue cultivating their land while the case was being decided. In March 2024, their request was denied.⁴⁸

For impoverished rural communities, the capacity to undertake lengthy legal action against the government presents many challenges, starting with legal fees and other expenses. Cases face incessant delays and favorable court decisions have rarely been enforced.⁴⁹ Lawyers who speak out against "pro-government" judges face swift repercussions and risk being forcibly disappeared.⁵⁰ As a result, villagers have been left with no faith in the domestic judicial system.⁵¹

Continued failures of domestic courts to protect community land rights against the government's rampant expansion of protected areas led villagers to take their case to the East African Court of Justice. In 2023, a case – Reference No. 46 (Dorapato Sanga, Jumaine Mwanga & 852 Others v. The Attorney General of the United Republic of Tanzania) – was brought by 23 villages and dozens of sub villages inside the new park's boundaries.⁵² Additional villages located inside the park and threatened by eviction were not included in this lawsuit because of time constraints. Funding crisis resulting in a backlog of cases at the EACJ has made the timeline for a ruling uncertain.⁵³

Many residents in villages now considered inside RUNAPA were evicted during previous expansions of "conservation" areas in the basin. In 1998, areas of the Ihefu wetland were gazetted to create the Usangu Game Reserve, leading to the forced removal of fishermen and herders.⁵⁴ In May 2006, the government launched the brutal "Anti Livestock Operation" to remove thousands of villagers and livestock from the Usangu Game Reserve and surrounding areas.⁵⁵ Pastoralists impacted by these evictions had since resettled in legally registered villages and rebuilt their lives. Now, they once again face evictions as the government further expands protected areas in the Mbarali District.



Despite all the evidence and the findings of the Inspection Panel, the Bank downplayed the threat and scale of evictions, claiming that the "government has informed the World Bank that it has no intention of resettling communities in the foreseeable future."⁵⁶ This promise has no legal basis and contradicts the Tanzanian government's public declarations and laws that forbid permanent settlement within national parks.⁵⁷ Villages across Mbarali District have been given no assurance from the government that they can remain on their lands and there is no certainty that there will not be widespread resettlement of communities inside RUNAPA in the future without an official boundary change.

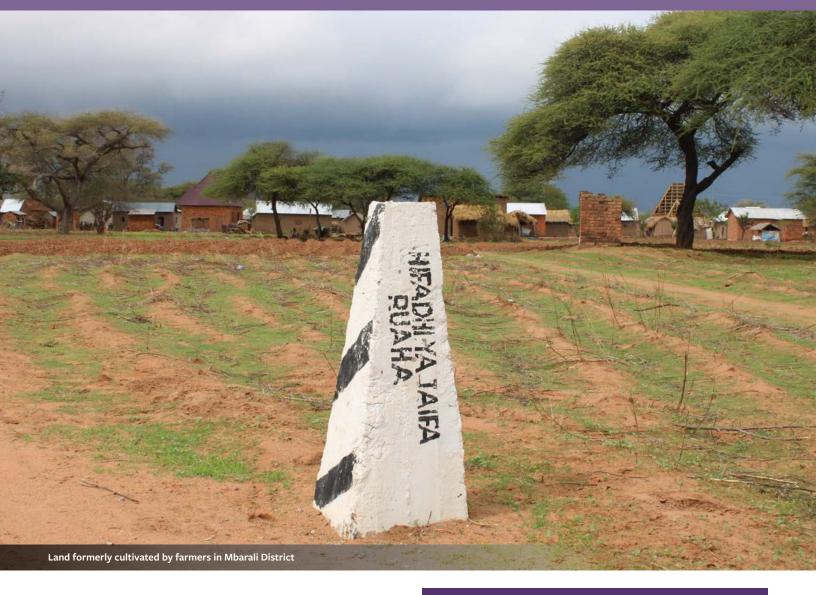
Even villages that the government has "promised" not to resettle have had houses marked for demolition and are deprived of basic social services. In Luhanga, for example, the government has halted the construction of a secondary school and stopped the expansion of electricity, even though holes for the posts had already been excavated.⁵⁸ Water projects previously run by the government in the village have stopped.⁵⁹ Students are each day forced to spend three to four hours walking to and from the nearest secondary school located 12 kilometers away.⁶⁰ As a result, many have dropped out of school.⁶¹ Primary schools in Msanga, Madundasi, Luhanga, Iyala, Mkondeko, and Kilambo are at risk of closure given the new park boundaries.⁶² The interruption of these services and activities for several years, with no indication that they will resume in the foreseeable future, add to the lack of faith in the government's promises.

"We were born here and don't know where we can go...we love our land, just want to stay here and repair our schools. But they won't let us do anything for our future."

- Maasai woman, Luhanga village

"The Bank did not adequately monitor the status of these villages or the Government's evolving plans regarding their resettlement. This meant that it missed the Government's early steps in a process to move communities outside the Park."

> - The World Bank's Management Response to Request for Inspection, June 2024



LIVELIHOODS DEVASTATED BY THE WORLD BANK

Livelihood restrictions imposed by the expansion and enforcement of RUNAPA's borders have devastated farmers and pastoralists who have suffered economic damages in the tens of millions of dollars in recent years. Considering the Bank's failure to "recognize that Project support of park management would invariably restrict access to legally designated parks, including the southern part of RUNAPA, and that this could result in adverse impacts on livelihoods linked to the Project," the Inspection Panel found the project in violation of the Involuntary Resettlement Policy OP 4.12, paragraph 3(b).⁶³

Regarding livelihood restrictions, in a response to the report, the Bank recognized that the project "narrowly focused on livelihood support to selected, beneficiary villages adjacent to the national parks," and "did not fully consider the potential impacts of improved park management on the livelihoods of communities in and near the Park, particularly in relation to Park access."⁶⁴ The result of this oversight has been catastrophic for both farmers and pastoralists.

"The Panel finds that Management did not recognize that Project support of park management would invariably restrict access to legally designated parks, including the southern part of RUNAPA, and that this could result in adverse impacts on livelihoods linked to the Project. Thus, the Panel finds the Project is not in compliance with OP 4.12 paragraph 3(b)."

- The World Bank Inspection Panel Report, September 2024

Farmers

The extent of damage to thousands of farmers who have been barred from cultivating because their lands are now inside RUNAPA is very substantial. While comprehensive figures for all affected farmers are not available, an estimate of the damage caused to the members of Mnazi and Mlonga farmer's associations provides the scale of this impact. 551 farmers of the two associations, which operated for years within rice farming schemes previously established by the government, have been stopped from cultivating rice since October 2022.⁶⁵

"Nobody consulted our association before we were stopped from farming. This is the third year of our suffering. Let us cultivate so we can live our lives again."

- Farmer, Mnazi Association

"Our children have no future. More and more of the youth are turning to crime or sex work to survive. Now this area is much more dangerous."

- Single mother, Mwanavala village

According to the members of these associations, each acre produces between 30 to 40 bags (100 kg) of rice annually. Taking a conservative estimate of 30 bags per acre, the 17,774 acres of these two farmer groups would have produced 533,220 bags of rice annually, the equivalent of 53,322 tons of rice. With an average market price per bag of TSh 100,000, this represents an economic loss of TSh 53,322,000,000 [US\$22,079,503] per year. With farmers stopped from cultivating for the past three years, the total economic loss incurred by these 551 farmers is TSh 159,966,000,000 [US\$66,238,509].⁶⁶

The inability to cultivate has imposed severe economic hardship for farmers. Many of them have loans that they are unable to pay back and some have lost their homes and other assets used as collateral.⁶⁷ Tractors and power tillers have been seized by TANAPA without any compensation.⁶⁸ Farmers have been forced to pull their children out of school as they can no longer afford fees. Small farmers have been strongly impacted, they are going hungry and struggling to survive.⁶⁹ These farms also employ laborers who have since been out of work.



Pastoralists

Pastoralists have been severely impacted by restriction of access to pasture land and cattle seizures by TANAPA rangers. The Panel concluded that "pastoralists and other community members, who have been drawing on resources to sustain their livelihoods in the southern part of RUNAPA, have been facing a resettlement risk in the form of restriction of access to a legally designated park."⁷⁰ It found that the project "failed to assess the impact of restriction of access and cattle seizures on the livelihoods of pastoralists."⁷¹ This failure has incurred a devastating cost on local herders.

Since 2021, TANAPA rangers have conducted numerous seizures of livestock claiming they were grazing within the park boundaries. Once seized, cattle were often kept at locations with no provision of pasture, water or salt licks, which has led to the death of many animals. Then, the cattle were either returned to their owners against the payment of fines or bribes or sold in a public auction.⁷²

In September 2022, TANAPA's Assistant Conservation Commissioner, Godwell Meing'ataki, stated, "We have captured 12,758 cattle in the park during 2021/2022," and the agency collected over TSh 1.2 billion [~US\$496,894] in fines.⁷³ It is unclear if these numbers include only fines paid by herders or also money collected by TANAPA through auction sales of the seized cattle. While updated comprehensive figures are difficult to gather, pastoralists in Mbarali District have documented the following damages as of May 2025:

- Since 2021, 53 families have been impacted by cattle seizures, losing 8,129 cattle for a value of TSh 16,258,000,000 [US\$ \$6,665,780].⁷⁴
- 353 goats, sheep and donkeys were also seized and auctioned.
- 42 families had to pay TSh 565,000,000 [US\$231,650] in fines to recover cattle that had been confiscated by TANAPA.





"Pastoralists have won court cases ruling that their cattle should be returned to them. But after these favorable outcomes in courts, cattle are often already gone. Even when the ruling says they should be compensated, they are still not paid. We have seen this many times over."

- Lawyer representing pastoralists in Mbarali District

Furthermore, many herders report significant financial costs incurred due to cattle seizures in addition to the value of the cattle lost and the fines paid to recover animals. These include:

- Payment of bribes and fees to the police, court, and magistrates.
- Legal fees for their lawyers.
- Long distance transport to the courts and to recover seized cattle.

The costs associated with cattle seizures are often too expensive for herders who end up losing their livestock in a devastating blow to their lives. Also, the rapid public auctions do not give them enough time to gather the necessary funds to pay the fines or buy their cattle back.⁷⁵ According to local pastoralists, the cattle are often sold far below market rate to connected individuals.

Rangers' Reign of Terror

Numerous incidents of violence – including extrajudicial killings, forced disappearances, sexual assault, and torture – have been committed by TANAPA rangers during the course of the project. Communities have been terrorized by the paramilitary force, with women and children subjected to abhorrent abuses. These attacks have been documented by local NGOs, discussed in the Tanzanian Parliament,⁷⁶ and were detailed in the initial request for inspection to the Bank's Inspection Panel.

"All violence we documented has occurred outside 1998 boundary because the community knows not to pass this point. They are being attacked by TANAPA in lands they do not consider inside the park."

- Pastoralist, Vikaye village

The Panel investigated the Bank's review and due diligence of the capacity and processes of TANAPA, the project's main implementing agency. The report documented how the World Bank provided material support to these rangers responsible for multiple human rights abuses and widespread cattle seizures. As a result of these "critical failures" of the Bank that resulted in "serious harm," the Panel found the project in violation of the "Investment Project Financing (IPF) Policy, paragraph 5"⁷⁷ and the Bank's Environmental Assessment Policy, OP 4.01, paragraph 3.⁷⁸ "The Project should have recognized that enhancing TANAPA's capacity to manage the Park could potentially increase the likelihood of conflict with communities trying to access the Park."

- The World Bank's Management Response to Request for Inspection, June 2024

The Bank was found to have failed to adequately supervise TANAPA and to be unaware that the agency's operating framework permits the rangers to use "excessive force."79 For instance, the Panel noted that the rules of engagement outlined in the agency's operating framework allows for "the shooting of potential offenders who are running away in certain circumstances."⁸⁰ The Panel observed that rangers materially supported by the Bank were allowed by Tanzanian law to shoot and kill people in a way that violates the internationally accepted standards established by the United Nations Basic Principles on the Use of Force and Firearms by Law Enforcement Officials. These standards only allow the use of force "in self-defense of others against imminent threat of death or serious injury" and stipulate that, "in any event, intentional lethal use of firearms may only be made when strictly unavoidable in order to protect life."81

In response to the findings, the Bank's management admitted "that by enhancing TANAPA's capacity to enforce the law," the project "increased the possibility of violent confrontations" between rangers and villagers.⁸² Given the fact that TANAPA began enforcing park boundaries that were not understood by communities during the project and agency officials considered a person's mere presence in the expanded protected area as "poaching,"⁸³ the risk of extrajudicial killings was extremely high. 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.⁸⁴ 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.⁸⁵ "Until the suspension of disbursement in April 2024, [the World Bank] management did not require regular reporting from TANAPA on its patrolling activities or specific incidents occurring on such patrols."

> - The World Bank Inspection Panel Report, September 2024

In 2018, a year after the launch of the project, TANAPA became a paramilitary organization, a classification that required rangers to wear military uniforms, undergo six months of paramilitary orientation training, and be subject to military, not civilian, discipline.⁸⁶ Despite this change, and a well-documented history of abuses committed by the agency,⁸⁷ the Panel observed that the Bank had "little to no discussion" about the classification change. The Panel's requests to TANAPA for a log of incidents, patrol register, and arms movements were denied by the agency on the grounds of "operational security."⁸⁸

Shockingly, the Panel found that "until the suspension of disbursement in April 2024, management did not require regular reporting from TANAPA on its patrolling activities or specific incidents occurring on such patrols."⁸⁹ When the World Bank was first made aware by the Oakland Institute of several incidents of violence, including extrajudicial killings, rapes, and torture committed by rangers during the implementation of the project in April 2023, Bank officials claimed that these incidents were not project-related.⁹⁰ They recommended that "alleged incidents of extrajudicial killings should be reported to the judicial authorities for review and action."⁹¹ Given the fear of retribution and that rangers are perceived as law enforcement by communities near RUNAPA, villagers could not risk reporting many of these abuses.

The Bank's initial dismissal and continued financing of the project despite being informed of egregious human rights abuses emboldened rangers to keep terrorizing villagers and committing killings and abuses.

"The beacon [park boundary marker] is causing sleepless nights... if we try to go to the river terrible things will happen. You will be beaten, arrested, shot, even disappeared."





TV interview with the father of Zengo Dotto after his killing by TANAPA rangers. Source: The Standard, Tanzania

The Murder of Zengo Dotto

In the early morning of October 28, 2023 – just days after GN 754 expanded RUNAPA to consume Mwanavala village – TANAPA rangers launched an attack. A low flying helicopter suddenly roared above a group of six herders at their camp in Mwanavala. Cattle scattered as rangers landed. In the ensuing chaos, rangers seized the cattle and as the pastoralists resisted to protect their herds, the rangers opened fire and killed 21-year-old Zengo Dotto. The unarmed young herder died trying to protect his families' main livelihood source from an illegal seizure. His family received no legal recourse or compensation from the government.

Just months earlier, the Inspection Panel had visited Mwanavala and heard direct testimonies from villagers who had previously been beaten and tortured by rangers. While the Panel recommended an investigation into TANAPA following the visit, the Bank continued financing the project and the rangers who would go on to murder Zengo Dotto.

The consequences of this inaction were severe. Six months after the Bank was made aware of TANAPA's abuses, rangers murdered 21-year-old Zengo Dotto in Mwanavala village during a cattle seizure on October 28, 2023.⁹² His family and those of the other victims await justice.

Since 2017, at least:

- 13 individuals have been killed.
- 5 individuals have been forcibly disappeared.
- Dozens of individuals have suffered physical and psychological harm, including beatings, torture and sexual violence.

These incidents have in some cases required medical treatment and hospitalization and have left the surviving victims physically and emotionally scarred. Fear of retribution has stopped many other people from reporting incidents of ranger violence, making the exact number of victims unknown. A comprehensive accounting of all violence inflicted by TANAPA within the disputed boundaries of the park is required to determine the full scale of harm caused.

CALL FOR ACCOUNTABILITY & JUSTICE

The Panel's report largely confirms the allegations made in the complaint filed in June 2023 and points with no ambiguity to the responsibility of the World Bank in enabling the expansion of the park and the resulting restrictions of access and severe human rights abuses faced by local communities. The project's design and preparation ignored the history of evictions and the presence of tens of thousands of people inhabiting the Great Ruaha River basin. The failure to properly supervise the project allowed the government to move ahead with eviction plans while permitting TANAPA rangers to commit atrocities with impunity.

Project Financing Continued Despite Known Safeguard Violations

Funding continued unabated for a full year after the Bank was made aware of harms caused by the project in April 2023. At the time of former President Magufuli's death in 2021, only US\$9.70 million or 6 percent of the total project budget had been expended.⁹³ After the request for inspection was filed in June 2023, the Bank disbursed US\$33 million to the project before it finally suspended disbursements in April 2024.⁹⁴ Between 2022 and 2024, US\$115,594,345 was financed by the Bank,⁹⁵ coinciding with the formalization of park expansion plans, livelihood restrictions, and escalation of violence by rangers.



BENKI YA DUNIA YAIPONGEZA TANZANIA KWA MRADI WA REGROW World Bank REGROW task team leader Enos Esikuri praising the project.

Despite receiving the shocking reports of violence, livelihood restrictions, and forced displacement related to the project, Bank officials continued to celebrate its impact. In November 2023, REGROW task team leader Enos Esikuri publicly expressed that the Bank was "very impressed with what is going on," when meeting with government agencies implementing the project.⁹⁶ Again, on July 1, 2024, the World Bank's VP for Eastern and Southern Africa, Ms. Victoria Kwakwa, praised and congratulated the existing cooperation between Tanzania and the Bank during a meeting on conservation and tourism.⁹⁷

Ongoing disbursements coupled with these statements were a clear message to the government that its gross violations could continue. It also downplayed the scope and severity of the Inspection Panel's ongoing investigation. The failure of the Bank to act sooner allowed cattle seizures and farm closures to continue draining family savings, kept children out of school, and let TANAPA rangers kill without fear of repercussions.

Communities Demand Justice

The impacted communities and the Oakland Institute have worked over the past two years to make the situation known, denounce the violence and wrongdoings of the Tanzanian government, and expose the World Bank's responsibility for the widespread suffering caused by its financing. Additional pressure to hold the Tanzanian government and the Bank accountable came on October 18, 2024, when nine United Nations Special Rapporteurs sent a communication to them demanding answers about evictions and human rights abuses to expand RUNAPA.⁹⁸ The UN experts "urge[d] that all necessary interim measures be taken to prevent any irreparable harm" to affected villagers.⁹⁹

"Money from the World Bank gave the government the power to hurt us. The Bank should stop all loans to the government that is driving our nightmare."

- Farmer, Mbarali District

In a drastic turn from its initial denial of wrongdoings, the Bank finally acknowledged "weaknesses in the project design, preparation, implementation, and Bank supervision" in response to the Panel's investigation.¹⁰⁰ However, the devastation that the World Bank and Tanzanian government created continues to decimate lives in the area and must urgently be addressed.

Source: REGROW Instagram

In response to the Inspection Panel's report, the World Bank prepared a draft Management Action Plan (MAP) that was shared with the requestors and the Oakland Institute on November 26, 2024. In the following weeks, the requesters held extensive consultations with communities to discuss the proposed MAP. In February 2025, after having their feedback to the draft MAP repeatedly ignored by the Bank's management, affected communities sent a letter to the Bank rejecting the MAP, given its failure to address the findings of the Inspection Panel report.

Communities impacted by the project since 2017 sent the following demands to the World Bank in response to the proposed Action Plan:

- 1. Remove beacons placed marking the expansion of the park and officially revert park boundary to the 1998 borders established by GN 436a.
- 2. Provide comprehensive compensation for damages incurred by livelihood restrictions and violence inflicted by TANAPA rangers. Reparations to include:
 - a. Value of fines paid by pastoralists to reclaim cattle illegally seized.
 - b. Value of cattle auctioned from pastoralists.
 - c. Compensation for the loss of agricultural production for three seasons (2023, 2024, 2025).
 - d. Compensation for the victims of violence by TANAPA or the family members of people murdered by TANAPA.
- 3. Establish a multistakeholder independent mechanism to oversee reparations.

Communities do not trust the government to distribute reparations and demand an independent mechanism that includes community-elected representatives, civil society representatives, and lawyers to be formed to fairly identify the victims of livelihood restrictions and violence and adjudicate the distribution of compensation payments.

4. Restore social services to villages impacted by GN 754.

- a. Complete construction on Luhanga Secondary School and provide it with government teachers.
- b. Reopen Mlonga Primary School that was closed in October 2022.
- c. Ensure all villages previously located within GN 754 boundaries are provided with the power, water, and social services they are entitled to like other villages.

"We call on the World Bank to fully assume its responsibility and urgently take these necessary steps to answer our pleas for justice. Our lives are on hold as the threat of eviction looms over us every single day. Our livelihoods have been undermined for years, our children are out of school, our farms sit fallow and our cattle are still being forcibly seized. We cannot continue living like this. The Bank must adequately address our past and ongoing suffering."

- Letter to the World Bank from Impacted Communities in Mbarali District



Bank's Redress Fails to Answer Community Demands

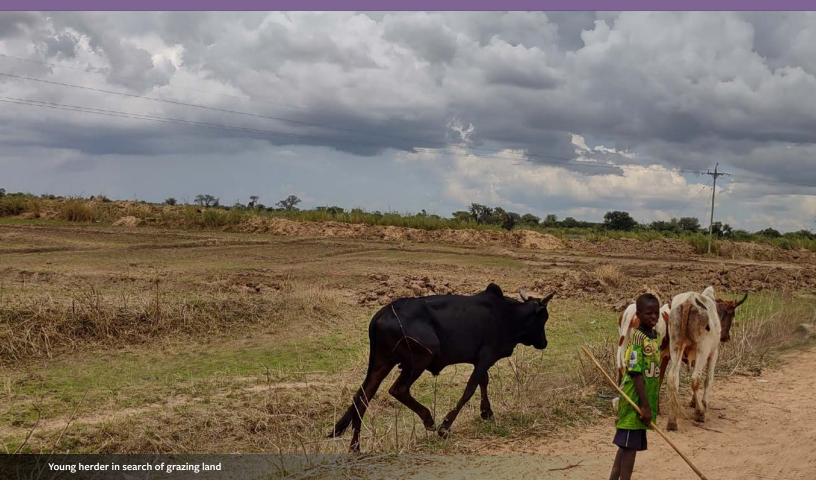
On April 1, 2025, the World Bank's Board of Directors approved a MAP meant to address the findings of the Panel's Investigation Report. While the final MAP incorporates lessons learned from the project to change broader procedures, it fails to remedy past harms suffered by the impacted communities and relies on promises from the Tanzanian government that were broken within a month.

First, the MAP takes the government at its word that there will be no resettlement for villages within GN 754 – a promise that as detailed in this report, contradicts Tanzanian law and offers little protection to over 84,000 people from violence, killings, and evictions. The Bank claims the government has provided written confirmation to communities inside RUNAPA that they will not be resettled "in the foreseeable future."¹⁰¹ Communities, however, have received no such guarantee from the state.

When pushed on this serious issue, the Bank maintained that "GN754 has not and will not result in any legal restrictions being imposed on the residents of the villages and hamlets within RUNAPA with respect to the use or disposal of their assets and resources within the respective villages and hamlets."¹⁰² Again, the Bank chose to take the government at its word despite the findings of the Inspection Panel and evidence directly shared with the Bank over the past two years. The government has already broken its promise. Between January 23-24, 2025, 490 cattle belonging to three pastoralists were seized by TANAPA near Iwalanji village (within GN 754 boundaries). The herders were forced to pay fines of Tsh 100,000 [~US\$41] per head of cattle to reclaim them, delivering a debilitating economic blow.¹⁰³ Just a few months later, over 1,000 more cattle were seized on May 7, 2025 outside of Iyala village. During this cattle seizure, a ranger shot and killed Kulwa Igembe, a young pastoralist whose family's cattle were taken (see Prologue).

Neither the Mnazi or Mlonga farmer associations have been permitted to return to their farms despite the government's assurances to the Bank. As a result, hundreds of farmers are suffering as tens of thousands of acres remain uncultivated. Debts continue to grow as farmers enter their third year of not being able to plant on their lands.

The MAP is silent on the need to bring redress for the economic losses caused by the REGROW project on farmers and pastoralists living in and around the new park boundaries. The Bank's 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.¹⁰⁴ Despite this clear obligation, no reparations for loss of land, cattle seizures, and farm closures have been included in the MAP. As the government has not permitted communities to reclaim their farming and pastoral livelihoods in full as it promised, it is imperative that impacted villagers are provided with comprehensive compensation.

Instead of offering compensation for past economic damages, the MAP instead details two "new" projects to address challenges that have arisen from restricted access to the park.

First, it proposes a US\$2.8 million project financed by the Japan Social Development Fund (JSDF) to offer support for "alternative livelihoods" and water management to five villages and several sub-villages inside the park and 45 across Mbarali District.¹⁰⁵ The activities proposed include the development of alternative livelihoods and a range of additional services, such as the "promotion of community empowerment, awareness raising on gender-based violence, and legal information and psycho-social support," implemented by a local NGO.¹⁰⁶

It also includes "innovative, climate-resilient community infrastructure" such as rainwater harvesting and storage systems, climate-resilient cattle troughs for livestock keepers, solar-powered boreholes, river training activities to enhance downstream water flows and mitigate flooding, and buffer zone restoration through tree planting.¹⁰⁷ While some of this infrastructure can be useful to communities, it cannot be overlooked that the JSDF project is a completely separate initiative that was not designed to address the harms caused by the REGROW project, as confirmed by the Executive Director's office representing Japan and openly acknowledged by the Bank.

The MAP also includes a new countrywide US\$110 million¹⁰⁸ operation financed by the International Development Association to "scale up locally led community climate actions and strengthen capacity to manage climate risks."¹⁰⁹ The new project is national in scope and it is currently unknown how much of it will accurately target villages impacted by REGROW. The operation is being prepared for Board consideration in 2025¹¹⁰ and focuses on support to "alternative live-lihoods, including micro-finance, community forestry, clean cooking, and will be supported by legal information, social services and community empowerment, among others."¹¹¹

The impact of both projects hinged on the government's promise that livelihood activities would resume for farmers and herders now living inside the park. Without their primary livelihood activities, over 84,000 people will not be able to make a living on the proposed alternative livelihoods. As evidenced by the aforementioned cattle seizures, farming restrictions, and murders, the situation on the ground has not changed for villagers, as promises made in the MAP have already been broken.



Next, instead of holding TANAPA rangers accountable and providing reparations to villagers who have lost loved ones to these violent crimes, the MAP only proposes a new grievance mechanism and the organization of a workshop on international best practices for park management. The workshop will focus on "practices relating to the use of force hierarchy; conflict avoidance; and community engagement and benefit sharing."¹¹² As detailed in this report, the violence inflicted by Bank-funded rangers has been severe and rampant and was the direct result of the Bank's failures to properly monitor TANAPA. The steps taken by the Bank are aimed at preventing future violence, yet offer no justice to those who have already lost loved ones to TANAPA's unchecked abuses of power that it enabled. As seen in April-May 2025, the Bank has also failed to prevent "future" violence.

The Oakland Institute had warned that given the extent of TANAPA's past human rights abuses, a workshop would be completely inadequate in preventing future harms. During the first month of the MAP's implementation TANAPA rangers killed two villagers in separate incidents (see Prologue). Emboldened by the Bank's ongoing failure to hold them accountable, rangers continue to terrorize communities with impunity.

Despite the MAP's assurance that a grievance mechanism in the project area had been "strengthened" and would be maintained despite the cancellation of the project, the communities impacted by the April and May 2025 TANAPA murders have no knowledge of any reporting mechanism. On May 13, 2025, the Oakland Institute shared an urgent alert with the Bank's management regarding the latest TANAPA murders. After two weeks, the Bank responded that it is relying on the Tanzanian government to conduct an investigation into the violence while continuing to engage the state on the implementation of the MAP. The communities were shocked to learn that the Bank is relying on the perpetrators of violence to investigate the killings.

Impacted villagers maintain their calls for reparations for violence, farm closures, and cattle seizures they have suffered. The Bank, however, continues to avoid responsibility, stating in a January 2025 communication that "to the extent that the Requesters believe that Tanzanian authorities engaged in unlawful acts, the Requesters should pursue such claims in Tanzanian courts...Similarly, the allegations of violence involving TANAPA officers, which are serious, should be investigated and adjudicated by a court of law with due process, which includes determining accountability under Tanzanian law."¹¹³

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 and farmers 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.¹¹⁴ 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.¹¹⁵ It is extremely unlikely that community members will be able to hold rangers responsible for abuses in court as the Bank suggests.

While the MAP fails to address past harms of the REGROW project, the Bank has made several key commitments around its portfolio to reflect the lessons it has learned moving forward. In Tanzania, the Bank signaled it has no plans to engage further with TANAPA and called for "broader policy and organizational review and adjustments within the Borrower's framework for protected area management."¹¹⁶ Globally, the Bank has announced a review of its active portfolio to "identify similar operations supporting national parks and protected areas and to assess whether risks similar to those identified in REGROW are present and are being properly managed."¹¹⁷ This process has identified projects in the active portfolio in other regions, which will now be "reviewed and retrofitted as necessary," to strengthen grievance mechanisms, incident reporting, enhanced training, and due diligence.

In response to the communities' rejection, the Bank has maintained their plan to be a "robust" response.¹¹⁸ Management has affirmed that that "the Bank is committed to support the Government of Tanzania to address relevant issues relating to resettlement, livelihood restrictions and confrontations."¹¹⁹ While reverting RUNAPA's boundaries to where communities accepted them in 1998 permanently resolves all three of these pressing issues, the Bank's management claims it carries no influence over the Tanzanian government's decisions regarding the boundaries of RUNAPA.

This attempt to wash its hands of the crisis it created overlooks that as of March 2025, the World Bank's financing commitments for operations in Tanzania amounted to US\$10 billion.¹²⁰ As one of Tanzania's largest financers, the Bank holds major leverage and undeniable influence over decisions made by the government, especially as they directly relate to Bank-funded projects. After spending two years willfully looking the other way as its own safeguards and procedures were trampled by the government, the Bank finally cancelled the REGROW project in November 2024. In addition to the MAP, the Bank still has the ability to answer the communities' call for justice – including full reparations for economic damages and ranger violence.

Given the Tanzanian government has already broken its commitments, the Bank must respond with decisive action to hold itself accountable to the communities affected by its financing and address their demands. The Oakland Institute remains committed to continue to advocate on behalf of the courageous villagers who will not give up their struggle to defend their rights to land and life.

"Perhaps we are now living in hell because this is not the world we used to know."

Pastoralist, Vikaye village



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