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**MANAGEMENT REPORT AND RECOMMENDATION  
IN RESPONSE TO THE  
INSPECTION PANEL INVESTIGATION REPORT**

**TANZANIA**

**RESILIENT NATURAL RESOURCE MANAGEMENT FOR TOURISM AND  
GROWTH (REGROW) PROJECT (P150523)**

February 28, 2025

**MANAGEMENT REPORT AND RECOMMENDATION  
IN RESPONSE TO THE INSPECTION PANEL INVESTIGATION REPORT  
OF THE  
TANZANIA  
RESILIENT NATURAL RESOURCE MANAGEMENT FOR TOURISM AND  
GROWTH (REGROW) PROJECT (P150523)**

Pursuant to paragraph 23 of the Resolution Establishing the Inspection Panel (IBRD Resolution 93-10 and IDA Resolution 93-6), attached for consideration by Executive Directors is Management's Report and Recommendation in response to the findings set out in the Investigation Report No. 192945-TZ dated September 16, 2024, of the Inspection Panel on the captioned Project (Tanzania: Resilient Natural Resource Management for Tourism and Growth (REGROW) Project (P150523)).

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**TANZANIA  
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**CONTENTS**

ABBREVIATIONS AND ACRONYMS .....	iv
EXECUTIVE SUMMARY .....	v
I. INTRODUCTION .....	1
II. PROJECT BACKGROUND .....	2
III. PANEL FINDINGS .....	6
IV. MANAGEMENT RESPONSE.....	9
V. MANAGEMENT’S ACTION PLAN IN RESPONSE TO THE FINDINGS .....	29
VI. CONCLUSION.....	38

**Annexes:**

Annex 1. Findings and Responses

Annex 2. Summary of Stakeholder Consultations for the Trust Fund Project

**Map:**

Map 1. IBRD 48170 – Ruaha National Park and the areas that were incorporated in the Park during the 2008 Park expansion

## **ABBREVIATIONS AND ACRONYMS**

AMS	Accountability Mechanism Secretary
CPF	Country Partnership Framework
CSO	Civil Society Organization
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
GN	Government Notice (Tanzania)
GPS	Global Positioning System
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
IBRD	International Bank for Reconstruction and Development
IDA	International Development Association
IEC	Information, Education and Communication
IPF	Investment Project Financing
IPN	Inspection Panel
MLHHSD	Ministry of Lands, Housing and Human Settlements Development
MAP	Management Action Plan
MNRT	Ministry of Natural Resources and Tourism
NGO	Nongovernmental Organization
OP	Operational Policy
PAD	Project Appraisal Document
PIM	Project Implementation Manual
RBWB	Rufiji Basin Water Board
REGROW	Resilient Natural Resource Management for Tourism and Growth (the Project)
RPF	Resettlement Policy Framework
RUNAPA	Ruaha National Park
SCDP	Stakeholder Consultation and Disclosure Plan
TANAPA	Tanzania National Parks
UN	United Nations
US\$	United States Dollar

## EXECUTIVE SUMMARY

### *Project Background*

- i. The REGROW Project was approved by the Board of IDA on September 28, 2017, for a US\$ 150 million Credit. The Project's development objectives were to improve management of natural resources and tourism assets in priority areas (including four national parks) of southern Tanzania, and to increase access to alternative livelihood activities for targeted communities.
- ii. Wildlife-based tourism was and remains a major component of Tanzania's economy, contributing more than one quarter of the country's foreign exchange earnings in 2019. However, tourism in the network of parks in the southern part of the country was not sufficiently developed, which also meant that people living near the parks could not benefit from it. In addition, wildlife poaching, which also degraded the environment, was widespread. The Project aimed to help address these interrelated issues, through four components: *(1) Strengthen management and improve infrastructure in priority Protected Areas; (2) Strengthen alternative livelihoods for targeted communities in proximity to the priority Protected Areas; (3) Strengthen landscape management and infrastructure investments in and upstream of RUNAPA; and (4) Project management, institutional strengthening, quality assurance and control, and monitoring and evaluation.*
- iii. In response to the Project's noncompliance with Bank policy requirements, the Bank invoked its contractual remedies on April 17, 2024, and suspended disbursements, as explained in more detail below. On November 6, 2024, the Borrower informed the Bank of its decision to cancel the Project.

### *Request for Inspection*

- iv. On July 20, 2023, the Inspection Panel registered a first Request for Inspection concerning the Project, submitted by two individuals who live in the Project area in Tanzania. In its Eligibility Report to the Board on September 19, 2023, the Panel recommended an investigation, which the Board approved on November 15, 2023. The Inspection Panel received a second Request for Inspection on May 3, 2024, from the same individuals, with additional information. The Panel recommended to the Board, on May 17, 2024, that this second Request be added to the then ongoing investigation, which the Board approved on May 24, 2024.
- v. On September 16, 2024, the Panel issued its report presenting the findings of the investigation. This Management Report and Recommendation responds to the findings of the Panel's investigation report (see Section III). It also includes a Management Action Plan to address the Panel's findings (see Section V).

*Management's Response*

- vi. Management appreciates the insights provided by the Panel's Investigation Report. The Panel's account of the complex Project context is useful and provides important lessons.
- vii. As explained in its Management Response to the second Request for Inspection, Management has carefully reviewed the Project and concluded that key risks were not fully appreciated during Project preparation and supervision. The three key risks that were underappreciated are the following:
  - *Resettlement*: Sizeable communities found themselves included inside Ruaha National Park (RUNAPA)—one of the four parks supported by the Project—as a result of a government expansion of the Park in 2008, which almost doubled its area, and which was completely unrelated to the Project. Consequently, they were at risk of resettlement during Project implementation. While Management identified this risk at preparation, it could have done more, especially during implementation, to monitor and address the situation.
  - *Law enforcement and conflicts*: Management has reassessed the connection between some of the violent incidents in and around the Project area and the Project. It has determined that Component 1 of the Project enhanced the capacity of Tanzania National Parks (TANAPA) to enforce existing park rules, and that such enforcement can involve violent confrontations between rangers and community members.
  - *Livelihood restrictions*: Enhancing the enforcement of park rules likely had an adverse socio-economic impact on community members in and around RUNAPA who relied on park resources for their livelihoods (e.g., grazing, hunting, fishing).
- viii. Despite the Project's broad objectives and geographical scope, the Bank's interpretation of Project risks and impacts during preparation and implementation focused narrowly on the Project's infrastructure and community support activities in limited sections of the Project area. Specifically, inadequate appreciation of TANAPA's law enforcement role and mandate, exclusion of a large number of villages from the Process Framework and the Grievance Redress Mechanism (GRM), and failure to monitor the situation of villages susceptible to potential resettlement, posed risks that should have been more seriously considered.
- ix. This meant that Project design and implementation did not provide for all the appropriate mitigation measures. This caused the Bank to overlook critical information it received during the course of Project implementation. These shortcomings, which pertained to involuntary resettlement, conflicts arising from law enforcement activities, livelihood restrictions, and Bank supervision, led to several instances of non-compliance with the Bank's Operational Policies. Management regrets that Project preparation and supervision did not fully

- appreciate these key risks, and hence they were not sufficiently assessed and addressed.
- x. The instances of non-compliance led to the Bank to invoke its contractual remedies in April 2024 and suspend disbursements. This was followed by the Borrower's decision to cancel the Project in November 2024. Nevertheless, the Borrower has reiterated full commitment to working with Management on the implementation of a Management Action Plan (MAP).
  - xi. *Involuntary Resettlement.* Management agrees with the Panel's finding that Project documents did not adequately identify the extent of human settlements within the southern part of RUNAPA. At the outset, the Bank assumed that the resettlement of villages from within RUNAPA was unlikely to occur during the life of the Project even though there was no clear basis for this assumption. In 2008, the Government had expanded RUNAPA in a way that caused several legally registered villages to become located within the boundaries of the Park. During Project preparation in 2017, the Bank identified that these villages might be relocated in the future but assumed that such resettlement was unlikely to occur during the life of the Project. This view was based on indications given by the Government, and the Bank did not adequately assess the situation of these villages inside the Park's boundaries during preparation. However, Management agreed with the Government that the Government would follow the Project Resettlement Policy Framework (RPF) as a mitigation measure to guide any potential future resettlement of these communities.
  - xii. During implementation, the Bank did not adequately monitor the status of the villages inside the Park 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 Bank received information on the Government's preparatory steps to resettle communities in April 2023, when the Oakland Institute, a US-based non-governmental organization that is advising the Requesters, wrote to the Bank expressing concerns about imminent relocation of villages inside RUNAPA. The Bank followed up with a field mission but did not visit the communities mentioned in the letter at that time even though, during the mission, it received indications that some preparatory activities for resettlement may have been initiated. In October 2023, the Government completed adjustments to RUNAPA's boundaries by issuing Government Notice 754 (GN 754). This boundary adjustment was in part meant to address concerns from local communities and removed 27 villages from the Park but kept within it five full villages and settlements of eighteen other villages. Management received information that the Government had begun identifying houses and assets in those villages; however, it was only in March-April 2024 that a Bank team visited the communities slated for resettlement for the first time as the Bank did not consider this to be part of the Project area. Management acknowledges that through regular supervision of the Project's resettlement aspects in the entire Project area, the Bank would have likely identified the ongoing process related to resettlement much sooner. This would have helped the Bank ensure that the Government applied the RPF to the

- resettlement planning process, which would have included extensive consultations with affected people, and agreement with the Bank on the timeline for the preparation and disclosure of resettlement action plans (RAPs).
- xiii. Following the Bank mission in March-April 2024 to two of the villages, the Bank suspended disbursements under the Project on April 18, 2024, and requested the Government to clarify its plans regarding resettlement. The Government, through the Minister of Finance, assured the Bank in writing on June 18 and June 26, 2024, that the Government had no intention of resettling the people living in the registered villages inside RUNAPA for the foreseeable future. It also stated that no communities had been physically resettled so far (despite the initiation of preparatory steps) and agreed to publicly communicate this decision to the residents inside RUNAPA.
- xiv. *Conflicts resulting from enhanced enforcement of restrictions of access to RUNAPA.* Management acknowledges that Project preparation and supervision did not sufficiently consider the implications of supporting TANAPA, a government agency with a law enforcement mandate. The Project financed resources for TANAPA's patrols, but consistent with Bank policy, did not finance firearms or ammunition. Under Tanzanian law, TANAPA is mandated to undertake the enforcement of rules and is authorized to use force in some limited circumstances to protect resources in the country's national parks. This includes guarding against poachers and individuals who bring their livestock into the parks and thereby threaten the ecosystem and wildlife. This enforcement role entails potential encounters and confrontations between rangers and individuals who make unauthorized use of park resources. Despite this significant risk, the Project did not include adequate mitigation measures to address the conflict potential that could result from patrolling, even though it was flagged in various Project assessments carried out during preparation and implementation. 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, and should have identified measures to help prevent, promptly report, and mitigate such conflict. Such measures should have included enhancing TANAPA's capacity to liaise with communities, conducting sensitization training, carrying out a security risk assessment, and preparing conflict prevention measures.
- xv. In addition, the Process Framework—one of the safeguard instruments under the Project intended to address the potential curtailment of economic activities that result from restrictions of access to national parks— did not cover all the relevant parts of the Project area or all the necessary measures. It should have covered not just the beneficiary villages under Component 2 of the Project but also the villages adversely affected by activities under Component 1. It also should have provided for specific measures to help prevent or minimize the likelihood of confrontations.
- xvi. Prior to the Project, parts of TANAPA already had a law enforcement mandate and a paramilitary structure. Then, in 2018, TANAPA was included in the new Tanzanian Wildlife Forest Service, together with other Government agencies, making the entire agency paramilitary. The Bank did not undertake a robust

- assessment of TANAPA at the start of the Project; nor did it conduct such an assessment of the 2018 re-organization and the resulting changes for TANAPA's operating procedures and practice. This was another missed opportunity to address a gap in Project preparation. After violent incidents were reported to the Bank, it should have undertaken an assessment of TANAPA's capacity and operating procedures and identified where its Code of Conduct and other instruments needed strengthening.
- xvii. *Livelihood restrictions.* The Project also aimed at improving park management, which can result in restricting communities' access to park resources. TANAPA's mandate to guard against unauthorized use of park resources includes preventing illegal grazing by cattle, which compete with wildlife for forage. However, grazing cattle and fishing are also essential livelihood activities for some communities that have lived in and around areas that are now part of national parks. Such access to park resources may be important to them, particularly during times of drought or scarcity, even though they are illegal.
- xviii. The Bank did not consider the potential impacts of improved park management and protection on the livelihoods of many communities in and around the Project-supported parks. Analysis during Project preparation did indicate that the economic activities of some communities could be curtailed by the improved park management measures supported by the Project. The Project undertook significant efforts to assess the situation of a subset of communities surrounding the Project-supported parks to gauge the impact of the enforcement of access restrictions on them and to address those through targeted livelihood support. To address this potential impact, the Project allocated US\$ 17 million to benefit 61 villages around the Project-supported parks, which were identified based on several criteria, including being "hot spots" for poaching. However, the support was limited to selected beneficiary villages and did not extend to communities living inside the Park and many other communities living all around the Park. The Process Framework that was prepared during Project preparation and the Project's GRM should have covered these communities as well, while also including measures to prevent and mitigate conflicts between Park rangers and herders, as well as other potential users of park resources.
- xix. The tension between park protection and livelihood activities is particularly apparent in the case of cattle. Cattle illegally grazing inside the Park is a major conservation challenge and such cattle are typically impounded by TANAPA, as required by law. This has caused confrontations that have led to injuries and even fatalities of community members and rangers. This source of conflict was not sufficiently considered during Project preparation, or during supervision. The Process Framework developed for the Project should have included specific provisions to manage conflicts stemming from access to park resources and guide interactions between Park authorities, communities, and other stakeholders.
- xx. *Tanzania portfolio.* While REGROW was cancelled at the request of the Government, there is an understanding and agreement with the Government to cooperate on the broader issues that surfaced in the Project, including promoting

sustainable and inclusive conservation. While no new Bank engagement is currently envisaged with TANAPA, the Bank has agreed with the Government to convene a workshop, which will bring various stakeholders together to discuss international best practices on park management. The challenges of the REGROW Project have highlighted systemic issues that cannot be addressed within the scope of a single project or park. Instead, these challenges call for broader policy and organizational review and adjustments within the Government's framework for protected area management, towards which the workshop could be an important contribution. Any potential future Bank engagement with TANAPA or another law enforcement agency would require a thorough institutional assessment, specifically considering and assessing the law enforcement agencies' capacity to engage in participatory processes as would be required under a Process Framework, as well as their codes of conduct and protocols for use of force, and their alignment with Bank standards and international best practices.

- xxi. *Lessons on law enforcement in protected areas.* The Bank has identified several lessons regarding projects related to law enforcement in and around protected areas, based on the REGROW experience and a global portfolio review. The insights have since undergone further analysis and discussion, also incorporating findings from the Panel investigation, to ensure a comprehensive understanding of the challenges and to identify best practices going forward. This process has contributed to establishing staff guidance and targeted staff training, which will better equip task teams involved in the planning, preparation, and supervision of similar projects in the future.
- xxii. Specifically, greater attention should be paid to establishing robust Process Frameworks to regulate access to restricted areas and associated resources in a manner that addresses potential negative impacts on communities. These are essential tools, required under Bank policies, for mitigating potential adverse livelihood impacts on communities, and for addressing disagreements and potential conflicts around access to such protected areas or national parks. Moreover, where national laws prohibit individuals from living within or accessing national parks or protected areas, this aspect should be taken into account when deciding whether the Bank should support such projects, and the conditions under which support can be provided. In such cases, it will be essential for the Bank to assess whether a sustainable solution can be identified that aligns with its policies. Bank-financed projects that aim to support the improved management of protected areas, such as national parks and wildlife reserves, often require a degree of support for law enforcement measures, especially for situations where communities or other stakeholders do not abide by the mechanisms to resolve potential conflicts that are provided in the Process Framework. These initiatives, which might include strengthening the capacity of local authorities to monitor and enforce conservation laws, can be essential in preventing activities like poaching, illegal logging, or unauthorized land use within protected zones. However, the involvement of law enforcement brings with it a distinct possibility of confrontations with individuals or groups who may resist conservation regulations. These risks must be carefully

considered and assessed during the project's planning, preparation and implementation stages.

- xxiii. In this context, it is critical that the Bank proactively discuss these security-related challenges with the borrower. Rather than avoid this sensitive subject, having open discussions about potential risks enables both the Bank and the borrower to establish a clear understanding of any sensitive or unresolved legacy issues, such as prior disputes over land rights or unresolved claims from affected communities, and design appropriate mitigation measures.

#### *Management Action Plan*

- xxiv. ***The Bank and the Borrower have agreed on a MAP to address the Panel's findings, as detailed in Section V of this report.*** The Borrower has committed to implementing the MAP and has provided written assurances to that effect. Management has also made extensive efforts to consult with the affected communities as well as the Requesters and their advisors on the proposed MAP.
- xxv. ***The proposed MAP places a strong emphasis on addressing livelihood challenges that potentially have arisen from restrictions of access to Park resources.*** The MAP seeks to help mitigate these challenges by focusing on support for livelihoods and water resource management for affected communities. This, in turn, would help reduce the risk of conflict and violence within the Park, which to some extent is driven by community members' access to protected Park resources. Since the Borrower's decision to cancel the REGROW Project, Management has worked with the Borrower to identify suitable operational platforms to implement and deliver the MAP actions. Management and the Borrower have agreed on the financing of US\$ 2.8 million through a Trust Funded project which has been developed independently from the REGROW Project objectives and scope for the implementation of a set of activities delivering immediate support for alternative livelihoods prioritized by communities in the villages and sub-villages inside RUNAPA and some communities around the Park. The targeted beneficiaries will include community groups, water user associations, smallholder farmers, and livestock keepers. The activities proposed would include the development of alternative livelihoods and the provision of a range of additional social services, which will be implemented through a reputable local non-governmental organization (NGO).
- xxvi. ***The MAP also includes a new community-led operation, financed by the International Development Association (IDA), that is fully aligned with the Tanzania CPF and which will support livelihoods through job creation.*** The proposed operation is to help address the adverse effects of conservation efforts by supporting alternative livelihoods and engaging with communities, including villages around RUNAPA that may have experienced livelihood restrictions associated with the REGROW Project. The operation is under preparation in consultation with the communities and other stakeholders and is being prepared for Board consideration in FY25. While national in scope, it will build upon support provided under the Trust Fund grant to vulnerable communities in the Usangu

- Catchment, including Mbarali District. The design of this operation will be based on a socio-economic assessment of the relevant communities, which will be done in consultation with the residents of villages affected by livelihood restrictions. The operation will also include an updated GRM for the Park's neighboring communities. The proposed community-based activities under this operation will support alternative livelihoods, including micro-finance, community forestry, social services and community empowerment, among others.
- xxvii. ***With regard to the challenges around sustainable and inclusive conservation, the Borrower will convene a workshop with development partners, including the Bank, to discuss international good practice on park management and protection of biodiversity.*** 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.
- xxviii. ***Management made substantial efforts to engage with the Requesters regarding the proposed MAP, including multiple rounds of communication and consultations with their advisors.*** However, these discussions were challenging partly because the 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. Based on this misconception, the Requesters put forth demands, through their advisors, to reverse the Park's expansion and seek compensation for past impacts from it. These demands are not supported by the Panel's findings and exceed the Bank's mandate and hence could not be considered for the MAP.

### *Conclusion*

- xxix. Management believes that the proposed MAP addresses the Panel's compliance findings. As indicated above, the Bank remains committed to supporting the Government of Tanzania to address the challenges of protecting biodiversity. The Bank has also derived useful lessons from this Project which will inform its engagement in the sustainable and inclusive conservation sector going forward, which will help to better assess and manage the potential impacts and risks stemming from access restrictions and law enforcement.

## **I. INTRODUCTION**

1. On July 20, 2023, the Inspection Panel registered a first Request for Inspection, IPN Request RQ23/02 (hereafter referred to as “the First Request”), concerning the Tanzania: Resilient Natural Resource Management for Tourism and Growth (REGROW) Project (P150523), (“the Project”), financed by the International Development Association (IDA, or “the Bank”). The First Request for Inspection was submitted by two individuals who live in the Ruaha National Park (RUNAPA) area of Tanzania, advised by the Oakland Institute, a United States-based civil society organization.
2. The Executive Directors and the President of IDA were notified by the Panel of receipt of the Request. Management responded to the claims in the Request on August 18, 2023. In its Eligibility Report to the Board on September 19, 2023, the Panel recommended an investigation, which the Board approved on November 15, 2023. The Panel did, however, discard two of the three allegations (Indigenous Peoples and Resettlement) as it did not consider them relevant at this stage.
3. Following Board approval of the Panel’s recommendation to investigate, the Accountability Mechanism Secretary (AMS) offered the Requesters and the Borrower the opportunity to participate in dispute resolution. On December 11, 2023, the AMS informed the Board, the Panel, and Bank Management, in a “Notice of No Agreement to Pursue Dispute Resolution,” that there was no agreement from either Party to pursue dispute resolution. The Panel posted its Investigation Plan online on December 11, 2023 and commenced its investigation.
4. The Inspection Panel received another Request for Inspection (“the Second Request”) on May 3, 2024 from the same individuals, with new information. The Panel recommended to the Board on May 17, 2024 that this Request be added to the then ongoing investigation, which the Board approved on May 24, 2024. The AMS offered dispute resolution to the Parties, which was declined on May 31, 2024. The Panel updated its Investigation Plan to include the Second Request on June 1, 2024. Management provided a response to the Second Request on June 27, 2024 (the “second Management Response”).
5. On September 16, 2024, the Panel issued its report presenting the findings of the investigation. Management appreciates the Panel’s clear and thorough presentation of its findings. This report, responding to the findings of the Panel, is organized in six sections. Following this Section I, Introduction, Section II provides Project background information. Section III summarizes the findings of the Panel. Section IV contains Management’s responses to the Panel’s findings. Section V presents Management’s Action Plan in response to the findings, and Section VI contains the conclusion. The Panel’s findings, along with Management’s responses, are described in detail in Annex 1. Annex 2 contains a summary of stakeholder consultations for the grant-supported activity that is part of the Management Action Plan.

## II. PROJECT BACKGROUND

6. **The Project.** The REGROW Project was approved by the Board of IDA on September 28, 2017, for a US\$ 150 million Credit. The two main implementing agencies were the Ministry of Natural Resources and Tourism (MNRT), and Tanzania National Parks (TANAPA). As of November 6, 2024, the Project is closed, following the Borrower's cancellation of all outstanding undisbursed amounts, and the advancement of the closing date to the same date.

7. **Context in which the Project was prepared.** Wildlife-based tourism was and remains a major component of Tanzania's economy, contributing more than one quarter of the country's foreign exchange earnings in 2019. However, tourism in the network of parks in the southern part of the country was not sufficiently developed, which also meant that people living near the parks could not benefit from it. In addition, wildlife poaching, which also degraded the environment, was widespread. The Project aimed to help the Government tackle these interrelated issues.

8. **Project Objectives.** The Project Development Objective 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 targeted communities.

9. **Project Components.** The Project had four components:

- **Component 1 – Strengthen management and improve infrastructure in priority Protected Areas (US\$ 97 million).** The objective of Component 1 was to improve the management and sustainability of natural resources inside the four priority protected areas in southern Tanzania, namely RUNAPA, Nyerere National Park, Udzungwa Mountains National Park, and Mikumi National Park. This was expected to be achieved through infrastructure investments, policy and regulatory support, and capacity/skills development grouped under three sub-components: 1.1 – Improve protected area infrastructure; 1.2 – Strengthen management capacity and infrastructure maintenance of Protected Areas; and 1.3 – Strengthen “Destination Southern Tanzania.”
- **Component 2 – Strengthen alternative livelihoods for targeted communities in proximity to the priority Protected Areas (US\$ 17 million).** The overall objective of this component was to provide access to improved economic opportunities to enhance livelihoods, reduce vulnerability to climate shocks, and reduce pressure on natural resources and wildlife. There were three sub-components: 2.1 – Improve the governance framework of conservation-related community-based initiatives; 2.2 – Enhance alternative community livelihoods by improving economic opportunities and linking them with conservation of wildlife and landscapes; and 2.3 – Skills development for local access to jobs in tourism and conservation.
- **Component 3 – Strengthen landscape management and infrastructure investments in and upstream of RUNAPA (US\$ 27 million).** The component focused on short-term infrastructure measures for the restoration of dry season

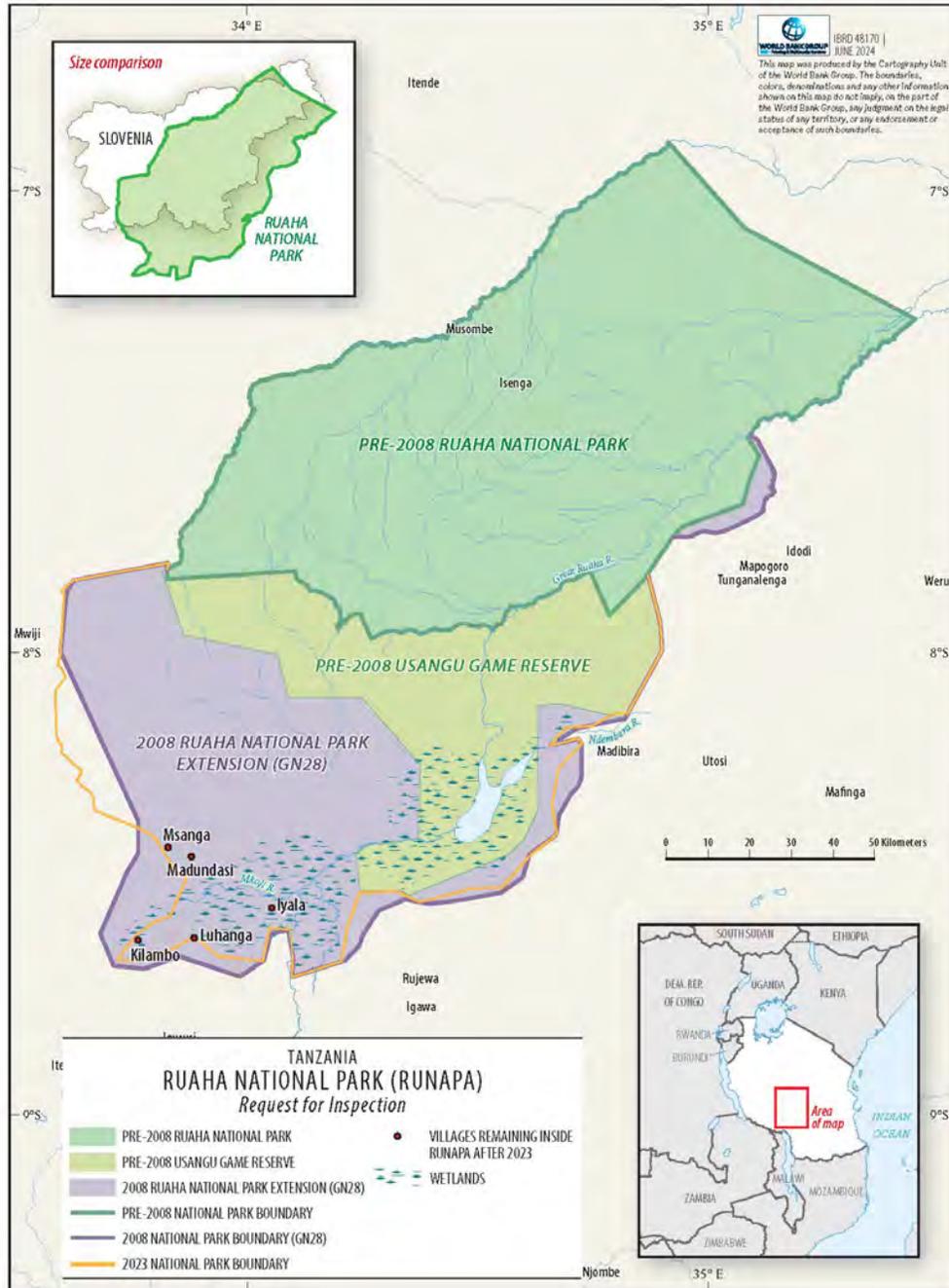
flows in the Great Ruaha River, which were considered critical for continued and expanded tourism in RUNAPA. As a secondary focus, the component laid the groundwork for mitigating future degradation of RUNAPA resulting from climate change impacts, excessive abstraction of water upstream of the Park, deteriorated water quality, and increased sediment in inflowing rivers, through water controlling structures and water sources protection. The sub-components were: 3.1 – Support infrastructure measures to augment dry-season flows to RUNAPA; 3.2 – Improve efficiency of irrigation systems; 3.3 – Enhance catchment conservation activities in selected sub-basins; and 3.4 – Support the consensus-building process for land and water management and climate change adaptation in the Usangu plains.

- **Component 4 – Project management, institutional strengthening, quality assurance and control, and monitoring and evaluation (US\$ 9 million).** This component financed supplemental support for Project management, to ensure coordinated and timely execution of infrastructure and other Project activities. It included Project oversight and coordination; establishment and operation of a Project Coordination Unit; fiduciary management, including external/internal audits and accounting; quality control and assurance systems; environmental and social safeguards management; development and implementation of a communications and stakeholder engagement plan; and short-term training on Project management. The component also financed a monitoring and evaluation system.

10. **On April 17, 2024, the Bank invoked its contractual remedies under the Project’s Financing Agreement and suspended disbursements.** The suspension was based on the Government’s initiation of preparatory activities for resettlement without following the requirements of the Project’s Resettlement Policy Framework (RPF). The Bank was also concerned about shortcomings in establishing an adequate Project Grievance Redress Mechanism (GRM) as per the requirements of the Stakeholder Consultation and Disclosure Plan (SCDP) and the Environmental and Social Management Framework (ESMF)<sup>1</sup>; confrontations between villagers living in the Project area and TANAPA’s rangers; and the absence of a reporting system for the Borrower to promptly inform the Bank of any such incidents. This followed reminders from the Bank to the Government on the subject during missions and in letters, first in August 2023, then in December 2023 and March 2024. The Bank required all three issues to be resolved before disbursements could resume. This suspension was followed by a high-level Bank mission to Tanzania in April-May 2024, where Management met with representatives of the Ministry of Finance, Ministry of Lands, Housing and Human Settlements Development (MLHHSD), MNRT, Mbeya Region and Mbarali District, to discuss the Government’s resettlement plans and incident reporting systems, among other issues.

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<sup>1</sup> The SCDP, ESMF, along with the Resettlement Policy Framework, and Process Framework were disclosed prior to project approval in 2017. The ESMF, SCDP and RPF were subsequently updated to correctly reflect the project area but were not disclosed due to closure of the project in November 2024.



Map 1: Ruaha National Park and the areas that were incorporated in the Park during the 2008 Park expansion. (The villages' exact boundaries are not shown in the map due to unavailability of confirmed cartographic sources)

11. **On November 6, 2024, the Borrower informed the Bank of its decision to cancel the Project.** The IDA General Conditions allow the Borrower to request such a cancellation. The Government's cancellation and the Project's closure mean that the Project can no longer serve to finance and implement the actions addressing the findings

in the Panel's Report. Nevertheless, the Borrower has reiterated its full commitment to working with Management on the implementation of a Management Action Plan (MAP). Given that the Project is now closed, Management and the Borrower have agreed to use trust fund resources and a new IDA operation as a suitable alternative operational platform to enable the Borrower to implement and deliver on MAP actions.

### III. PANEL FINDINGS

<p><b>Involuntary Resettlement</b></p>
<p><b><i>Identification of Project’s Area of Influence</i></b></p> <p>The Environmental Assessment Policy requires evaluation of a project’s potential impacts in its area of influence, which it defines to include areas used for livelihood activities (hunting, fishing, grazing, gathering, agriculture, etc.). <b>The Panel finds Management’s definition of the Project area of influence to include the four park areas and their surroundings is in compliance with OP 4.01, Annex A, paragraph 6.</b></p>
<p><b><i>Environmental Assessment and Consideration of Social Aspects.</i></b></p> <p><b>The Panel finds that the Project documents 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 Panel finds 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.</b> The Panel notes that in March and April 2024, Management visited some of the five villages to understand better the social risks facing them.</p>
<p><b><i>Involuntary Resettlement from Land Take</i></b></p> <p>The Panel observes that project documents reported earlier efforts of resettling people out of RUNAPA based on GN-28, and that these had been discontinued. The Panel, therefore, observes that the Bank was aware of the legacy issues but did not gather sufficient information on the villages and sub-villages remaining within the Park and the livelihoods sustained by Park resources. Without such information, the Bank was unable to identify the extent of the livelihoods impacts resulting from enforcement of Park boundaries.</p> <p>The Panel observes that during project implementation there was evidence of resettlement planning for communities living in the Park. The Panel further observes that the Government and the Bank had agreed that any resettlement taking place in the Park during the life of the Project would comply with the Bank’s Involuntary Resettlement Policy. The Panel notes that for non-Project related resettlement in the Project area the RPF was to be used on a voluntary basis for Government-sponsored involuntary resettlement activities. The Panel observes that in this case, and in the context of park management across RUNAPA, the application of the resettlement instruments is mandatory for all involuntary resettlement and/or loss of assets or access to assets and livelihoods within the Project area during the life of the Project, even if Project documents state that it is voluntary.</p> <p><b>The Panel finds that while a RPF was prepared for the Project, early resettlement activities were underway without its use or the application of other Bank Involuntary Resettlement Policy provisions relating to physical resettlement. The Panel finds this is not in compliance with OP 4.12, paragraph 3(a).</b></p>
<p><b><i>Involuntary Resettlement – Restriction of Access to Legally Designated Parks</i></b></p> <p>The Panel observes that although the Project included a Process Framework, until March 2024 Management did not identify that Project support to park management would increase the enforcement of restriction of access with implications for livestock grazing and other resource uses from within the Park. Moreover, the Project’s Process Framework was not designed to cover the Project area in its entirety nor was it used to help mitigate the negative impact on livelihoods. <b>The Panel finds that Management did not recognize that Project support of park management would invariably restrict access to legally</b></p>

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).

**Park Management and Law Enforcement**

*Assessment of the Implementing Entity’s Capacity and Consideration of Human Health and Safety; and Social Aspects as a result of Project Activities*

The Panel observes that, during Project preparation, background information on serious incidents committed by TANAPA prior to the Project and in relation to restriction of access was publicly available. The Panel also observes that the Project identified existing and ongoing conflicts in RUNAPA, principally related to Park boundary changes and restriction of access. Furthermore, in November 2018, TANAPA officially adopted a paramilitary system.

The Panel reviewed the capacity assessment of the Project’s implementing agencies conducted by the MNRT which the Project used to deem TANAPA’s capacity adequate. The Panel observes that this assessment did not evaluate TANAPA’s mandate and legal framework, its law enforcement role for the management of national parks, and the implications of its activities on the health and safety of community members. The Panel also observes that the Project’s lack of consideration of these aspects, especially as it was supporting patrolling with equipment, is a serious omission which led to no specific measures being identified to address potential weaknesses in TANAPA’s capacity.

**For these reasons the Panel finds the Project is not in compliance with the IPF Policy, paragraph 5, which requires the Bank to assess the appropriateness of the needs and capacity of the borrower and any project implementation entity. The Panel also finds the Project is not in compliance with the Bank’s Environmental Assessment Policy, OP 4.01, paragraph 3, which requires a project to take into account human health and safety and the institutional capabilities related to the environmental and social aspects.**

The Panel further observes that the Project provided equipment and infrastructure to improve TANAPA’s ability to patrol RUNAPA and to combat illegal activities, including cattle grazing. Given the history of conflict in relation to the management of and the restriction of access to national parks and other PAs, the Panel also observes that TANAPA personnel would be expected to engage people in RUNAPA and there could be associated risks of serious incidents occurring. The Panel observes that no mitigation measures to manage this risk were included in Project documents.

*Assessment of Project- related Risks Resulting from Park Management and Law Enforcement*

The Panel observes that the Project did not adequately consider that several registered villages, with thousands of people whose livelihoods depend on resources located inside the Park boundary, live in and around RUNAPA. The Panel also observes that the Project did not adequately consider the implications of pre-existing conflicts over the use of Park resources. The Panel further observes that the Project did not 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.

**Therefore, the Panel finds that Management did not adequately assess the Project risks in the Project area of influence as they relate to these observations, which increased the exposure of communities to the potential use of excessive force by TANAPA rangers. As such, the Panel finds the Project is not in compliance with IPF Policy, paragraph 4, which requires a project to take into account social considerations, and related risks. The Project is also not in compliance with the Environmental Assessment Policy, OP 4.01, paragraph 2, and the Involuntary Resettlement Policy, OP 4.12, paragraph 3(b), as analyzed in Chapter 2, above.**

## Project Supervision

### *Bank's Supervision of the Project*

The Panel observes that the Bank undertook regular, biannual supervision visits. In addition, the Bank conducted four interim missions that reported progress on environmental and social implementation performance. The Panel observes, however, that although social specialists were included on missions, they narrowly focused on the implementation of Component 2 in the priority villages outside the national parks. The Panel also observes that after the allegations of TANAPA's use of excessive force against community members were first made in April 2023 to Management, the composition of the Bank supervision team did not include relevant expert support. **The Panel finds the expertise engaged during supervision was not commensurate to the risks and reported allegations of involuntary resettlement and the use of excessive force until December 2023. The Panel also finds that before December 2023, Management supervision was insufficient and did not recognize that an involuntary resettlement process had been initiated. Management also did not identify or record the serious reports of excessive violence, including during cattle seizures related to restriction of access to legally designated parks and other incidents. The Panel finds this is not in compliance with Bank Policy on Investment Project Financing, paragraph 20.**

### *Bank's Exercise of Remedy in Relation to Borrower's Contractual Obligations*

The Panel observes that, following the March 2024 supervision mission, Management suspended the Project on April 18, 2024. **The Panel finds Management in compliance with the Bank's policy on Investment Project Financing, paragraph 27 (December 2021), for having exercised the Bank's legal remedy by suspending disbursements of unwithdrawn amounts of the Bank Loan.** The Panel observes that while the intent of the suspension of disbursement is to bring the Project back into compliance with Bank policies, the Panel notes that the measures suggested to lift the suspension may not fully address the shortcomings of this Project identified by this investigation.

#### IV. MANAGEMENT RESPONSE

12. Management appreciates the insights provided by the Panel in its Investigation Report. The Panel's account of the complex Project context is useful and provides important lessons.

13. As explained in Management's Response to the second Request for Inspection, Management concluded that there were key risks that were not fully appreciated during Project preparation and supervision, which meant that Project design and implementation did not provide for the appropriate risk mitigation measures. This caused the Bank to overlook critical information it received during Project implementation, which it believed, incorrectly, was not relevant for the Project. These shortcomings during preparation and implementation, which pertained to *involuntary resettlement, law enforcement and confrontations, livelihood restrictions, and Bank supervision*, led to several instances of non-compliance with World Bank Operational Policies (OPs), including OP 4.01, OP 4.12 and the Policy on Investment Project Financing (IPF). Management regrets that Project preparation and supervision did not fully appreciate key risks related to resettlement, enforcement activities and livelihood restrictions in and around RUNAPA, and hence those risks were not sufficiently assessed or addressed.

14. The analysis of impacts and supervision of the Project focused too narrowly on the Project components dedicated to infrastructure and community support, and not sufficiently on other Project activities that could have a connection to enforcement activities and livelihood restrictions. Management also erroneously concluded that the actions of the park rangers in the course of their duties were not connected to the Project.

15. Additional mitigation measures could have helped reduce the risk of violence, even if Project-level interventions alone likely would not have been able to prevent or resolve such conflicts and confrontations. Because of the risk of possible use of force by law enforcement agencies that is to be expected for any national park project that entails enforcement of existing park rules in the context of poaching or prohibited use of park resources, the Project should have applied additional and necessary due diligence, monitoring and enhanced mitigation measures.

16. Management made significant efforts to help restore compliance with Bank policies and support the Borrower in addressing the identified issues of concern. The Borrower made good progress in revitalizing the GRM, adopted an improved incident reporting system, and provided additional information on past incidents. However, because limited progress was made on resettlement issues as set out in the Bank's April 2024 letter suspending disbursements, the suspension could not be lifted. Furthermore, implementation of some additional corrective actions that the Bank had discussed with the Borrower has been limited, including the Bank's offer to review the updated Process Framework, TANAPA's General Orders (code of conduct), its governance framework, and staff training. Efforts to improve Project implementation and supervision were rendered moot with the Borrower's decision to cancel the undisbursed Credit proceeds and close the Project effective November 6, 2024.

17. The Bank and the Borrower have agreed on a MAP to address the Panel’s findings, as detailed below in Section V. The Borrower has committed to implementing the MAP and has provided written assurances to that effect.

18. ***The proposed MAP has a strong emphasis on addressing livelihood challenges that potentially arise from restrictions of access to Park resources. The MAP seeks to help mitigate these challenges by focusing on support for livelihoods and water resource management. This in turn would help reduce the risk of conflict and violence within the Park, which to some extent is driven by community members’ access to Park resources.*** Following the Borrower’s decision to close the Project, Management has worked with the Borrower to identify suitable operational platforms to implement and deliver the MAP actions. Management and the Borrower have leveraged financing of US\$ 2.8 million from a Trust Fund that has been developed independently from the REGROW Project objectives and scope, for the implementation of a set of activities delivering support for alternative livelihoods prioritized by communities in the villages and sub-villages inside RUNAPA and some communities around the Park. The targeted beneficiaries will include community groups, water user associations, smallholder farmers, and livestock keepers. The activities proposed would include the development of alternative livelihoods and the provision of 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, which will be implemented through a reputable local nongovernmental organization (NGO) to be engaged by the Government.

19. Building on the Trust-Funded activities and experience gained, a proposed new IDA-financed operation for scaling up locally led community climate actions will help address adverse effects of environmental degradation and conservation by supporting alternative livelihoods and engaging with communities across Tanzania, including villages around RUNAPA that may have experienced livelihood restrictions associated with the REGROW Project. The operation is under preparation in consultation with the communities and other stakeholders and is being planned for Board consideration in FY25. It is fully aligned with the Tanzania CPF.<sup>2</sup> The proposed community-based activities under the forthcoming IDA-financed operation will also support alternative livelihoods, including micro-finance, community forestry, clean cooking, social services and community empowerment, among others.

20. Management is also using experience and lessons from the REGROW Project to inform current and future Bank-financed operations that support national parks and protected areas globally. This is described in paragraphs 63-65 below.

21. The following paragraphs provide Management’s response to key findings of the Panel in more detail.

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<sup>2</sup> CPF Objective 3 focuses on strengthening resilience to shocks and climate impacts (paragraphs 59–61) and managing natural resources to support resilient economic growth. The increased emphasis on resilience reflects the significant risks that climate change and other shocks pose to Tanzania’s growth trajectory.

### **Involuntary Resettlement – Physical Relocation**

22. ***Management agrees with the Panel’s finding that the definition of the Project area of influence as including the four parks and their surroundings was in compliance with OP 4.01, Annex A.***

23. ***Management agrees with the Panel’s finding that Project documents did not adequately identify the extent of human settlement within the southern part of RUNAPA.*** Indeed, as explained in the second Management Response, at the time of Project preparation, the Bank was aware that several villages were located within RUNAPA, but it did not gather sufficient information to determine the location and size of the villages, nor did it sufficiently identify the livelihood sources of village residents.

24. ***To the Bank’s knowledge based on field visits and consultations with the Borrower and communities, since Project appraisal to date, no physical resettlement has taken place. However, the potential relocation of the villages from within the Park following the pre-Project Park extension was never ruled out by the Government, and hence has remained a possibility throughout the Project’s life.*** Although the Government had expanded RUNAPA in 2008 in a way that caused several legally registered villages to become located within the boundaries of the Park, the Project was not intended to resettle, nor did it require the resettlement of, those villages and it did not support the Park’s extension.<sup>3</sup> During Project preparation in 2017, the Bank identified the possibility that these villages might be relocated in the future but relied on government officials advising that such resettlement was unlikely to occur during the life of the Project.

25. ***The Panel finds that the early resettlement activities underway inside RUNAPA without following the RPF were not in compliance with OP 4.12. Management acknowledges that it should have ensured that the Government applied the RPF to the early stages of the resettlement planning process in RUNAPA, which it was required to follow under the terms of the Financing Agreement for any future resettlement of communities in the Project area.*** The due diligence for the Project assessed the history and status of resettlement of villages within the Park. At the time of Project preparation, the Park boundaries were set by Government Notice (GN) 28, which was issued in 2008.<sup>4</sup> A preparation mission in 2016 indicated that the number of people living inside the Park was not known, and that the Government had not fully determined whether they would need to relocate at all, and, if they did, when that might take place. The Project Appraisal Document (PAD) stated that the Government might choose to resettle some households

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<sup>3</sup> Inspection Panel Investigation Report, paragraph 223, observes that “while the early Project concept focused on improving watershed management of the Greater Ruaha River in southern RUNAPA, during Project preparation the focus shifted towards park management.” Management wishes to clarify that watershed management remained part of the Project activities.

<sup>4</sup> The villages (and sub-villages) within RUNAPA (as defined by GN 28) at the time of Project approval were Nsonyanga, Udindilwa, Nyamakuyu, Magulula, Nyakazombe, Mpolo, Mlungu, Miyombweni, Mbalino, Mpogoro, Wimba, Mahango, Igava, Simike, Kapunga, Ukwavila, Waruma, Imalilosongwe, Azimio, Ibumila, Mahango, Mkunywa, Lualaje, Vikaye, Mwanamvala, Iwalanje Ikanutwa and Igunda.

living within the Park. If that were to happen, the Bank and Government agreed that the Government would follow the Project's RPF, whose provisions are consistent with OP 4.12 on Involuntary Resettlement. This agreement was properly reflected in the RPF (and by reference in the Financing Agreement), thus enabling Management to invoke it and apply contractual remedies upon confirming the Borrower's breach.<sup>5</sup>

26. ***Management did not take notice of some incipient resettlement planning activity when, in April 2023, the Oakland Institute's letter addressed to the Bank referred to the MLHSD Minister's October 2022 speech indicating a plan to pursue resettlement in the Project area.*** Similarly, in October 2023, Management was copied on a letter from the Government to the Executive Director representing Tanzania which stated that: (a) the Government had begun identifying houses and assets in several villages in RUNAPA as one of the early steps of a resettlement process; and (b) the Government had decided to redraw the boundaries of RUNAPA. Later that month, the Government issued GN754/2023, which superseded GN28 and redrew RUNAPA's boundaries.<sup>6</sup> At that point – after submission of the first Management Response – it became clear that the Government intended to pursue the preparatory activities to resettle communities from inside RUNAPA based on the redrawn official park boundaries. The letter also acknowledged that a valuation process was underway to compensate the residents of the affected villages, and that the Government had set aside land to be re-allocated to them. Despite these indications, Management failed to take immediate notice and proper action. During a supervision mission that took place in December 2023 Management again reiterated to the Government its legal obligation to follow the RPF, without making any reference to the Government's October 2023 letter or the new GN754.

27. ***In February 2024, the Bank was informed of a legal challenge to GN754 initiated against Tanzania before the East African Court of Justice by a group of residents from the villages remaining within RUNAPA.*** On March 7, 2024, the Bank wrote to the Government requesting clarity on the status of the villages inside RUNAPA<sup>7</sup> and asking to be informed if any relocations were planned. In the same letter, the Bank expressed

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<sup>5</sup> Inspection Panel Investigation Report indicates that the application of the RPF was "mandatory" rather than "voluntary." Management agrees and wishes to clarify that, notwithstanding the use of the term "voluntary" in the RPF, the Financing Agreement for the Project *required* the Borrower to comply with the RPF for any resettlement in RUNAPA during the life of the Project. In that sense, application of the RPF to early resettlement planning activities in RUNAPA was "mandatory," and it is on this basis that the Bank invoked contractual remedies to suspend disbursements under the Project in April 2024.

<sup>6</sup> GN754/2023 was issued on October 20, 2023, and published in the Gazette on October 20, 2023, as well. The new GN754 redrew the official boundaries of RUNAPA and reduced its extension by 404 km<sup>2</sup> (from 20,226 km<sup>2</sup> to 19,822 km<sup>2</sup>), thereby carving out twenty-seven (27) villages that were previously located inside the Protected Area, in an attempt to reduce conflict and minimize potential resettlement. Despite this effort by the Borrower, at least 5 villages and various hamlets, pertaining to other villages contiguous to the Park, remained within new park boundaries and, accordingly, potentially affected by resettlement.

<sup>7</sup> The remaining villages inside RUNAPA are: Msanga, Madundasi, Luhanga, Kilambo, and Iyala. Additionally, the scattered hamlets or sub-villages that also remain (albeit partially) inside RUNAPA belong to the villages of Nyamajojoro, Mwenge, Manispaa, Mshikamano, Kipangala, Ukwava, Mfwalulenga, Mgona, Mapelemehe, Salukova, Mkindi, Mnyelela, Majengo, Mwaniungu, Mnazi, Mapinduzi, Chang'ombe, Mavumbini, Ujamaa, Mapogoro 'B', Liembelali 'A', Magwarisi, Unyanyembe 'B', Mlonga, Amani (Kinyasuguni), Tambaragosi, Ifushiro, Lwanjili, Mkanada, Mpunga Mmoja, Itambo Mpolo, Ugandilwa, Mapula 'A', Mapula 'B' and Mapululu.

willingness to work with the Government's teams to ensure that the work and all related communications followed the agreed procedures. The Government responded on March 22, 2024, that any resettlement was on hold due to the legal challenge.

28. ***In March-April 2024, a Bank team visited some of the communities remaining inside RUNAPA. The difficult access due to seasonal floods and large footprints of the villages meant that it was not possible for the Bank team to visit all five villages in the time it had available.*** The team visited one village and a sub-village of a second one, where it saw evidence, confirmed by Government officials, that official meetings and a process of identification of assets in those villages had begun. The Bank was also informed by Government officials that resettlement planning had re-commenced early in 2022 after it had previously stalled. However, the Government had not applied the provisions of the RPF (e.g., notifying the Bank on resettlement plans, and initiating resettlement plan preparation, baseline census and socio-economic survey) in these preparatory steps as required under the Financing Agreement and RPF.

29. ***In light of this information, on April 17, 2024, the Bank invoked its contractual remedies under the Financing Agreement and suspended disbursements as of April 18, 2024.*** The suspension was followed by a high-level Bank mission to Tanzania in April-May 2024, where Management met with representatives of the Ministry of Finance, MLHSD, MNRT, Mbeya Region and Mbarali District, to discuss the Government's resettlement plans, grievance redress mechanisms and incident reporting systems, among other issues.

30. ***On May 16, 2024, the Bank requested a legal opinion from the Borrower confirming whether the issuance of GN754 mandated the relocation of communities from within RUNAPA.*** On May 23, 2024, the Government sent a legal opinion from the Attorney General's Office to the Bank stating that there was no legal decision to resettle the five villages and the sub-villages from the Park and that residents could legally remain in place. Moreover, the same legal opinion stated that GN754, by itself, did not affect the villagers' rights and that no process of de-registering the villages had begun.

31. ***The Bank then sent the Government a letter seeking to clarify its intent regarding future resettlement activities. In a letter dated June 18, 2024, signed by the Minister of Finance, the Government stated that it had no intentions to resettle communities in the foreseeable future and that no communities had been physically resettled so far (despite the initiation of preparatory steps).*** In a letter dated June 26, 2024, the Government confirmed once again that all resettlement activities had been stopped, including stock-taking, asset marking and valuation, and further committed to make its position public, including clarifying the scope of economic activity that can be carried out by the villagers living within RUNAPA. A Bank team visited the remaining villages within RUNAPA on June 18–20, 2024 and met with groups of 50 to 300 villagers in each village, including village leadership and sub-village heads. The Bank mission did not observe any ongoing resettlement activities on the ground. The villagers consulted said that although public notification of the intention to acquire land (e.g., through public meetings and notices) and asset identification activities (e.g., distribution of inventory forms) were initiated at one point, no one had been relocated or involuntarily displaced, and the communities were

continuing with their livelihood activities. In two villages, some residents stated that TANAPA was unclear on the location of the boundaries between the village land and the Park, though Management was not able to confirm this further. Schools and public services also appeared to be functioning normally, and power lines and cellphone towers were in place.

32. ***Notwithstanding the foregoing, the Project GRM was strengthened to receive any complaints related to potential park management and resettlement-related impacts for the villages and sub-villages inside RUNAPA.*** In July and August 2024, Bank missions provided training to the regional, district, ward and village government officers, as well as the existing Village Grievance Redress Committees (GRCs), on the strengthened GRM. The update was intended to ensure that GRCs in the expanded GRM take into consideration REGROW-specific grievances as part of their existing mandate. The GRM was further reinforced with additional grievance uptake channels, including seven toll free lines and the Government’s *e-mrejesho* (<https://emrejesho.gov.go.tz>) platform. Information about the GRM was also extensively disseminated in the southern region through Information, Education and Communication (IEC) materials and media broadcasting. At the Bank, a hotline and email address were established to receive and manage grievances. In addition, in September 2024, the Bank engaged a firm to provide media monitoring services to ensure that the Bank is promptly notified of any public information signaling or suggesting the re-initiation of resettlement activities inside RUNAPA.<sup>8</sup>

33. ***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.***<sup>9</sup> These media reports reflected official communications shared by district authorities at community level. The Panel’s report also confirms the Government’s intent to allow communities to remain in RUNAPA. According to the report by the Panel, the Government informed the Panel that it had “*stopped the resettlement process and will not resettle the five villages inside southern RUNAPA in the ‘foreseeable future.’*”<sup>10</sup> The Panel was further informed that community members “*faced no land-use restrictions and would continue to be provided with public services.*”<sup>11</sup> Local district authorities affirmed to the Panel that “*community members were informed they could continue their lives as usual.*”<sup>12</sup>

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<sup>8</sup> The firm is monitoring mainstream media and social media in English and Swahili to alert the Bank to any information relating to potential resumption of resettlement activities for the villages and sub-villages within RUNAPA. It is also monitoring for any violent incidents that may occur in or around any of the four Project-supported parks.

<sup>9</sup> Tanzania Times: “Five Villages in Mbarali Allowed to thrive on seceded part of Ruaha National Park.” Link: <https://tanzaniatimes.net/news-ruaha-national-park-allows-five-villages-to-thrive-on-its-seceded-parts/>; Mwananchi: “Only Five villages remain in Ruaha from 33.” <https://www.mwananchi.co.tz/mw/habari/kitaifa/vijiji-ndani-ya-ruaha-vyabakia-vitano-kutoka-33-4682640>.

<sup>10</sup> Inspection Panel Investigation Report, paragraph 88.

<sup>11</sup> *Id.*

<sup>12</sup> *Id.*, paragraph 89.

34. Between August 14-16, 2024, a Bank team visited one of the villages in RUNAPA and held discussions with the GRC members from all five villages along with officials from the regional and district governments. The team found that the progress made in strengthening the GRM was satisfactory. However, when following up with the communities on the messages conveyed by the Government regarding the potential resettlement of the five villages and sub-villages within RUNAPA, only a limited number of community members demonstrated an understanding and awareness of the Government's position and intention not to resettle the villages for the foreseeable future. Consequently, the Bank requested the Government to provide further clarity regarding its dissemination mechanism and the message that was being communicated to the affected communities.

35. Between September 23-28, 2024, a Bank team visited the other three national parks also covered by the Project to verify whether there were any resettlement activities and examine other issues between TANAPA and the communities as well as possible challenges faced by communities regarding restrictions on their livelihoods. The Bank team was informed that there were no villages within the three national parks and no resettlement issues reported. Key challenges to people's livelihoods among the communities surrounding the parks involved human-wildlife conflict and cattle incursions into both the villages and the national parks.

#### MAP Actions

- *The Borrower will provide written confirmation that the communities inside RUNAPA will not be resettled in the foreseeable future (completed).*
- *The Borrower will maintain the strengthened GRM (comprising GRCs, toll free lines and the Government's digital complaints platform, e-Mrejesho).*
- *The Borrower will retain the GRCs, which have been strengthened through training, the adherence to a GRM Manual that has been updated and agreed with the Bank (with an addendum for the villages and sub-villages inside the Park), and continuous dissemination of IEC materials.*
- *The Bank will maintain in its Tanzania office a hotline and e-mail ("Tanzania Alert") for direct grievance reporting to the Bank in relation to its lending portfolio.*

#### Law enforcement and conflicts

36. ***Management acknowledges 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.*** This was a key weakness in the Project design, because the possibility of confrontation between TANAPA rangers and communities in the area should have been

recognized as an inherent risk related to the enforcement of conservation rules and the associated use of force by park authorities. An analysis of past practice and conflicts would have highlighted the pertinent risks and helped to consider how those risks could be adequately managed within the Project.

37. ***As noted in the second Management Response, Project preparation and supervision did not sufficiently consider the implications of supporting TANAPA, a government agency with a law enforcement mandate that includes the use of force in certain circumstances.*** The Project financed infrastructure and equipment to be used during TANAPA’s patrols, but consistent with Bank policy, it did not finance firearms or ammunition. Under Tanzanian law, TANAPA is authorized to use force in some limited circumstances to protect resources in the country’s national parks. This enforcement role entails encounters and sometimes confrontation between rangers and unauthorized users of park resources, such as poaching for wildlife trophies or bushmeat, or livelihood-related activities such as gathering fuelwood or grazing livestock.<sup>13</sup> These encounters can become violent. Despite this significant risk, the Project did not include adequate mitigation measures to address the conflict potential that could result from patrolling. The Project should have recognized that enhancing TANAPA’s capacity to manage the Park better could potentially increase the likelihood of conflict with communities accessing the Park, and should have identified measures to help prevent, promptly report, and mitigate such conflict. Such measures should have included enhancing TANAPA’s capacity to liaise with communities, conducting sensitization training, carrying out a security risk assessment, and preparing conflict de-escalation measures. In addition, the Process Framework should have provided for conflict-specific measures, to help reduce the likelihood of violent encounters.

38. ***Management notes that cattle grazing in the national parks is a significant conservation challenge. TANAPA’s role under Tanzanian law is to seize such cattle, in order to protect the biodiversity of the national parks. This inherently presents a risk of conflict with the herders and was not sufficiently considered during Project preparation. In addition, the Bank’s implementation support efforts did not adapt to the reality of these risks.*** This was due to an excessive focus on addressing wildlife poaching, which was rife at the time. In addition, the issue of herders entering the Park was not identified in the Project’s safeguard documents. Since then, TANAPA’s focus of attention has shifted from wildlife poaching to illegal grazing (also considered a poaching activity under Tanzania’s Wildlife Conservation Act), in light of the rapid increase in the number of cattle incursions into the parks. Conversely, wildlife poaching incidents have decreased.

39. ***At Management’s request and pursuant to the Bank’s April 2024 letter suspending Project disbursements, TANAPA has updated the reporting protocols in the Project Implementation Manual (PIM) and has reported to the Bank all incidents of cattle found illegally grazing in the parks and seized in accordance with applicable law since 2013 and up to the advanced Project closing date of November 6, 2024.*** Several incidents involve the confiscation of cattle, attempts by herders to recapture confiscated cattle and ensuing violence leading to injuries and fatalities of herders and occasionally

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<sup>13</sup> The Government of Tanzania uses the term “poaching” to refer to any illegal use of National Park resources, whether it be trophy hunting, illegal fishing, hunting for bushmeat or illegal grazing.

also of rangers. A Bank team visited a stockade for confiscated cattle during its April-May 2024 mission to RUNAPA and observed that the process is complex and leaves both rangers and herders open to violence.

40. ***As detailed in the Panel’s report, confrontations between TANAPA and communities have been documented over the last 20 years, and Tanzania’s park management sector has received “significant criticism for its approach to managing parks and related law enforcement.”***<sup>14</sup> Management agrees that the Bank did not pay sufficient attention to this aspect, as these pre-existing challenges and the history of conflicts should have been considered more prominently in the design and implementation of the REGROW Project.

*Institutional assessment*

41. ***During Project preparation, the Bank conducted a limited institutional assessment of TANAPA and other implementing partners. The assessment did not address risks related to conflict or the potential for disproportionate use of force.*** The assessment recommended engagement of additional outreach workers to improve relations between TANAPA and local communities, which was implemented. The Project SCDP listed roles and responsibilities for TANAPA but did not examine TANAPA’s role in enforcing park rules or consider its track record, or lessons learned from past confrontations between rangers and communities.

42. ***Prior to the start of the Project, TANAPA rangers already had a law enforcement mandate and a paramilitary structure.*** The institution was included in the new Tanzanian Wildlife and Forest Conservation Service on November 17, 2018, together with other existing Government agencies, making the entire agency paramilitary. The Bank did not undertake an assessment of the new organizational structure and the resulting changes for TANAPA’s operating procedures and practice. During implementation, but before Project-financed works began, Environmental Impact Assessments were prepared for each park to identify and mitigate risks associated with Project-financed activities. The *Environmental and Social Impact Assessment* for RUNAPA was produced in November 2022. It stated that if the rangers were not sensitized appropriately in community relations and awareness of human rights, situations could result in unrest or violence and conflict. It mentioned that TANAPA should develop policies to help rangers conduct community relations responsibly, with responses proportional to the threat. However, this recommendation was made in relation to security incidents on Project-financed construction sites, rather than incidents relating to the enforcement of park rules. Nevertheless, these recommendations were not implemented.

43. ***After the second Management Response, the Bank offered to work with TANAPA to help review and address the issues of concern regarding confrontations resulting from law enforcement efforts.*** The Bank engaged a firm with expertise in ranger security to conduct an evaluation of TANAPA’s institutional capacity and law enforcement rules and approach, as well as its training relating to de-escalation of conflict and human rights-based

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<sup>14</sup> Panel Investigation Report, paragraph 45.

approaches. The firm helped the Bank to conduct a desk-based evaluation in September-October 2024, which established a benchmark for assessing TANAPA, based on international best practices across criteria such as organizational structure, staffing, training, and applicable rules for use of force. This report has not been discussed with the Government, nor have any potential resulting recommendations been implemented, as the Project has closed. As noted in the MAP, however, the Government has agreed to convene a workshop to discuss international good practices in park management, including use of force in the enforcement of park rules. This report will be an important input into that workshop.

#### *Incident reporting*

44. ***The Government reported several incidents to the Bank starting in 2023. The Bank has also been notified of alleged additional incidents either by third parties (e.g., NGOs, UN Human Rights Council Special Procedures) or through alternative channels (World Bank Grievance Redress Service (GRS), media and social media screenings, etc.).*** At the Bank's request, the Government sent detailed information about cattle seizures and violent incidents that occurred throughout the implementation period of the Project up to closing on November 6, 2024. The Bank has reviewed and discussed all these incidents with the Borrower, as well as all additional incidents that have come to the Bank's attention from other sources (i.e., the advisers to the Requesters, independent NGO reports, media and social media, and anonymous grievances lodged through the GRM and GRS). The Bank does not have a mandate to investigate the attribution of responsibilities for these incidents. Nevertheless, it has worked with the Government to review each one of them and to determine root causes and corrective actions.

45. ***The level of detail about the incidents varies, and obtaining confirmation of facts is challenging.*** During the April-May 2024 mission, the Government shared with the Bank GPS locations self-reported by rangers, photographic evidence, and a more detailed account of what was alleged to have happened in several of the reported incidents. In other cases, however, the Bank received little additional or corroborating information, or none at all, and is therefore not in a position to verify whether the alleged incidents occurred. The Bank has logged each incident in accordance with applicable internal Bank requirements. During the course of its incident reviews, the Bank purposely decided not to speak directly with affected people whose identities were known, because of community concerns about reprisals. Instead, the Bank conducted media and social media searches on each of the alleged events for which the Government did not have information or was unable to share additional information with the Bank. Some of the incidents had considerable media and social media coverage, while some had little, and several had none.

46. As agreed with the Bank during the April-May 2024 mission, the Government established a protocol in the updated PIM for reporting to the Bank any serious Project-related incident. This protocol established the criteria for reportable incidents, outlined the steps to be taken when an incident occurred and against what timetable, including a root cause analysis and corrective actions. The Government confirmed that it has reported to the Bank all incidents meeting the established criteria that have occurred in any of the four Project-supported parks from the effective date of the Project until November 6, 2024 (i.e.,

the advanced Project closing date). According to the Government, applicable protocols were followed for all incidents related to patrolling and law enforcement.

47. Neither Management nor the Panel has been able to confirm the details of violent incidents that were raised in the Request. As outlined in the Panel's report, violent confrontations also predated the Project and are related to TANAPA's law enforcement mandate and the way it manages the protected areas. While the Bank's efforts to work directly with TANAPA on that issue have had limited success, Management has agreed with the Government on several actions that are detailed in the MAP.

#### MAP Actions

- *The Borrower will maintain the strengthened GRM (comprising GRCs, toll-free lines and the Government's digital complaints platform). This GRM has strengthened the existing GRCs through training, adherence to an updated GRM Manual and continuous dissemination of IEC materials. The Borrower has submitted to the Bank a report on implementation of the GRM.*
- *The Borrower will convene a workshop with development partners, including the Bank, to discuss international good practice on park management. 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.*
- *Moreover, the Bank has agreed with the Borrower to provide, through trust funds, targeted support for the broader local communities in Mbarali District. This will include the provision of legal information and psycho-social support to people residing in and around RUNAPA, which will be provided through a reputable local NGO.*

#### Livelihood restrictions

48. ***Management acknowledges the Panel's finding of non-compliance with OP 4.12 paragraph 3(b), which covers direct economic and social impacts that both result from Bank-assisted investment activities and are caused by the involuntary restriction of access to legally designated parks and protected areas that adversely affects the livelihoods of the displaced persons.***

49. ***As explained in the second Management Response, the Project aimed at improving park management, which can result in restricted access to park resources.*** While TANAPA's mandate includes guarding against the unauthorized use of park resources, raising cattle and fishing are basic livelihood activities for some communities that have lived in and around the national parks for decades, even though those activities are illegal inside the parks. By focusing selectively on some Project areas, the Bank did not consider the potential impacts of improved park management on the livelihoods of all communities in and around the Project-supported parks.

50. ***The Panel concluded that the Bank failed to consider that support towards enhancement of law enforcement in park management directly leads to restrictions of access for local communities to resources in legally designated parks.<sup>15</sup> While this risk was considered by the Bank, Management acknowledges it was not adequately assessed and mitigated.*** As the Panel noted and Management explained in the second Management Response, the PAD, the ESMF and the Process Framework all indicated that the Project would enhance TANAPA's ability to enforce park rules and reduce the illegal use of park resources, including grazing. The PAD stated that a Process Framework would be applied as a precautionary measure to the extent that surveillance activities would "*marginally contribute*" to increasing existing restrictions of access, with a focus on communities where illegal activities were prevalent. However, the Process Framework did not cover any villages outside of Component 2 and was silent on how enforcement activities could restrict communities' livelihoods and potentially exacerbate tensions in all villages nearby the parks, or inside it. That said, the ESMF did note tensions between villages inside the Park and TANAPA. Other analysis pointed to community members' complaints about periodic raids by park rangers, cattle seizures, contested boundaries and rangers firing warning shots during confrontations with herders. ***A Project GRM, as well as a comprehensive Process Framework establishing resource management parameters covering all relevant villages adjacent to all four Project-supported parks, should have been put in place.***

51. ***While the effort was too geographically limited, the Project did undertake significant efforts to assess the situation of a subset of communities surrounding RUNAPA to gauge the impact of the enforcement of access restrictions on them and to address those through targeted livelihood support.*** To address this potential impact, the Project's Component 2 allocated US\$ 17 million to benefit 61 villages around the Project-supported parks, which were identified based on several criteria, including being "hot spots" for poaching. A secondary objective was to mitigate the impacts resulting from TANAPA's curbing of illegal livelihood activities inside the parks under Component 1. Component 2 of the Project includes financing for education, training, small businesses and recruitment of village members to be Village Game Scouts who help prevent poaching and human-wildlife conflict. The Component (within its limited geographic scope) has been implemented successfully. The targeted communities therefore have significant incentives to not encroach or illegally use park resources. Still, the support under Component 2 was limited to these selected beneficiary villages, whereas a Process Framework governing resource access, as well as the GRM, should have covered all other communities in and around all four Project-supported parks.

52. ***Since the second Management Response, Management has confirmed that the Government expanded the GRM beyond the villages directly supported by the Project.*** The Panel reported that it was informed by the Government that the GRM expansion would be limited to the five registered villages within RUNAPA. Management confirms that the GRM has in fact been expanded not only to the villages directly supported by the Project but also to all 5 villages and 39 sub-villages inside RUNAPA. Further, IEC materials developed on the GRM that include information on the availability of GRCs, toll-free lines and the Government's digital complaints platform have been disseminated widely to all

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<sup>15</sup> Panel Investigation Report, Executive Summary, paragraph 68.

villages within and around RUNAPA and the broader Project area. The Bank team observed the training and expansion process of the GRM, and training of GRCs for all 5 villages and 39 sub-villages. During the April-May 2024 mission, the Bank had agreed with the Government that the subsequent extension of the GRM to all the remaining villages (210 in total, inclusive of the five villages in RUNAPA) adjacent to the four national parks supported by REGROW would take place in phases. Since the Project was closed by the Borrower, the strengthening of the GRCs was only accomplished in those five villages inside RUNAPA. However, information on the toll-free lines and the Government's digital complaints platform has been disseminated in the broader Project area.

53. ***In addition, the Bank had recommended that the Government update and expand the Project's Process Framework to cover villages inside RUNAPA and relevant villages adjacent to the Project-supported parks.*** Management acknowledges that in light of the Project's early closure, this Process Framework may not be updated by the Borrower as recommended. Instead, the potential impacts on communities' livelihoods that were not mitigated through REGROW's limited Process Framework aim to be addressed through the activities proposed under the new Trust Fund operation, which has been developed independently from the REGROW Project objectives and scope but has significant overlaps in its beneficiaries.

#### MAP Actions

54. *The Borrower will work with the Bank to support the communities in and around RUNAPA by addressing potential livelihood challenges arising from restrictions of access to the Park. The action will not only seek to mitigate these challenges but potentially also help reduce the risk of conflict and violence within the Park. It involves the following:*

***(a) The design and implementation of a project financed by a Trust Fund, which has been developed independently from the REGROW Project objectives and scope and will include support for alternative livelihoods activities prioritized by communities in the villages and sub-villages inside RUNAPA and some communities around the Park.***

*The project is supported by a US\$ 2.8 million grant from a Trust Fund. The project will be implemented by the Rufiji Basin Water Board (RBWB) assisted by a reputable NGO to be identified. The communities of focus will be 45 vulnerable villages in Mbarali District, including the five villages and several sub-villages inside RUNAPA. The Project Development Objective is to promote community-led solutions to climate change adaptation in the Usangu Catchment. The project activities to be selected by communities themselves will be structured into two components:*

*Component 1 aims to improve water resource management in response to shortages within RUNAPA. This will help to reduce water-related conflicts. It will support the implementation of participatory, climate-resilient, and nature-based catchment management actions by local governments and RBWB officers. These*

*efforts will ensure that both existing and newly developed water resources are managed in a coordinated manner, addressing the prioritized needs of local communities. This component will fund the feasibility, design, and implementation of innovative, climate-resilient community infrastructure, including:*

- 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.*

*Tree planting activities will engage community members, with a focus on job creation for youth and women. Indigenous plant and tree species, drought-resistant crops, and pollinator-friendly vegetation will be prioritized to ensure sustainability and resilience.*

*Component 2 will support a participatory assessment to identify alternative community livelihood needs. The findings from this assessment will guide the establishment and training of new local self-help groups and the provision of seed money. This seed money will fund small grants for group members to develop sustainable community livelihoods, such as honey production and alternative energy solutions. By fostering these initiatives through grants and training, the project aims to reduce pressure on water resources, enhancing economic resilience and adaptive capacity*

*As part of component 2, the project will engage a highly qualified and respected local non-government organization (NGO) to provide legal information, social services and empowerment to communities in the Usangu catchment, including training existing GRCs on legal information and psycho-social support. The NGO will be hired by the RBWB to work with the local government and the local communities.*

*While the type of physical interventions has been determined during project preparation, their exact location and further specifications will be determined through consultations with the relevant communities. Once determined, the activities will be implemented in collaboration with local communities, including water committees. New community groups will be mobilized, trained, and receive technical support from RBWB. Funded livelihood activities will be overseen and coordinated by village committees of local communities. Beneficiaries will be actively involved in prioritizing, planning, implementing, and monitoring project interventions and they will be the key beneficiaries of job-focused interventions, including skill training.*

***(b) The preparation of a new community-led IDA-financed operation that will support livelihoods through job creation.***

*The proposed Program is a nationwide operation that will help address adverse effects of conservation efforts by supporting alternative livelihoods and engaging with communities, including villages around RUNAPA that may have experienced livelihood restrictions associated with the REGROW project. The operation is under preparation in consultation with the communities and other stakeholders and is being prepared for Board consideration in FY25. While national in scope, it will build upon support provided under the Trust Fund grant to vulnerable communities in the Usangu Catchment, including Mbarali District. The design of this operation will be based on a socio-economic assessment of the relevant communities, which will be done in consultation with the residents of villages affected by livelihood restrictions. The operation will also include the updated GRM for the parks' neighboring communities. The proposed community-based activities under this operation will support alternative livelihoods, including micro-finance, community forestry, clean cooking, social services and community empowerment, among others. It is worth noting that program activities and planned interventions will take place outside park areas.*

*There will be a strong focus on livelihoods and jobs. The program will further support strengthening local systems and support for scaling up local climate actions in selected priority areas with high vulnerability to climate risks. There will be additional focus on vulnerable and marginalized communities in critical watersheds and around protected areas in the southern part of the country, specifically the Usangu Catchment.*

*Initial Stakeholder Consultations for the Trust Fund project took place between November 18 – 22, 2024, while the design stage consultations for the IDA project took place between December 4 – 13, 2024. Further detailed consultations for both projects will continue, including during implementation. The summary of the initial consultations is contained in Annex 2 of this report.*

***(c) In addition, the Borrower has agreed to maintain the strengthened GRM for the communities inside RUNAPA beyond the closing date of the Project. This will allow communities in and around RUNAPA to bring to the GRM concerns they may have related to restrictions of access to the Park.***

**Project Supervision**

55. As noted in the second Management Response, key risks for the REGROW Project were not fully appreciated during Project preparation and in the Project design, which also caused the Bank to overlook critical information it received during implementation.

56. Notably, regarding the tensions between local communities and TANAPA officers, Management initially did not identify a connection between the Project activities and the

incidents of conflict and confrontation, as similar incidents had also occurred before the Project began and in other parts of the country. Consequently, during implementation, there was insufficient attention paid to these incidents and no follow-up to identify and address their root causes within the context of the Project. Proper identification and follow-up would also have required including staff with relevant conflict-management expertise in the supervision missions.

57. Nonetheless, upon the suspension of the Credit and during the April-May 2024 mission, the Bank worked with the Government to set up a system for it to promptly report to the Bank all violent incidents associated with the Project, that involved TANAPA rangers and/or occurred inside the parks supported by the Project. In addition, the Bank requested the Government to report on cattle seizures as part of regular Project progress reporting, and to report immediately on any seizure that involved a violent altercation. The Government updated the PIM to include this expanded incident reporting protocol. The incident reporting protocol and templates agreed upon during the April-May 2024 mission were immediately implemented by the Government, which used them to report any such events to the Bank up to the Project closing date.

58. The Bank also created a context-specific media screening and alert system focused on TANAPA, with the intention of keeping the Bank informed of any violent incidents and resettlement activities in the four parks. In addition, as also noted in paragraph 0 above, the Bank hired a firm to systematically monitor and collect media reports on these topics from both mainstream and social media. These efforts enabled the Bank to verify and/or supplement the list of incidents captured by the Government's monitoring systems (i.e., TANAPA's occurrence book) and reported to the Bank. All incidents that have come to the Bank's attention have been logged and raised with the Government.

59. **Management notes the Panel's finding that the frequency of Project supervision missions was adequate.**<sup>16</sup> Nonetheless, Management highlights that after the suspension of disbursements, in April 2024, the Bank significantly bolstered its supervision and attention to this Project, including through five additional technical missions. These included two missions to the five villages in RUNAPA, two missions to strengthen the GRM, and one mission to the three other national parks supported by the Project. The Bank team also held several technical discussions with the Government. The Bank's supervision at the time was supported by a firm specializing in security and conflict in the context of protected area management.

60. With the Project's cancellation on November 6, 2024, efforts to improve supervision were no longer relevant. However, the Borrower has expressed to the Bank its commitment to implementing the agreed actions in the MAP.

#### MAP Actions

- *The Borrower will maintain the strengthened GRM (comprising GRCs, toll free lines and the Government's digital complaints platform). The existing GRCs have*

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<sup>16</sup> Inspection Panel Investigation Report, paragraph 198.

*been strengthened through training, adherence to an updated GRM Manual and continuous dissemination of IEC materials.*

- *The establishment of a program financed by a Trust Fund and developed independently from the REGROW Project, which will include legal information and psycho-social support to be provided through a reputable local NGO.*

### **Next steps for the Tanzania portfolio**

61. Despite the cancellation of the Project, the Bank will continue to engage with the Borrower on the broader issues that have arisen in its context. The next step is the agreed workshop, which will consider how Tanzania is managing national parks and protected areas overall.

62. Currently no new Bank engagement with TANAPA is planned. The implementation and supervision challenges of the REGROW Project have highlighted systemic issues that cannot be addressed within the scope of a single project or park. Instead, these challenges call for broader policy and organizational review and adjustments within the Borrower's framework for protected area management. Any potential future Bank engagement with TANAPA or other law enforcement agency would require a thorough institutional assessment, specifically considering and assessing TANAPA's law enforcement activities and their alignment with Bank standards and international best practices. This would include a review of the agency's legal and operational framework, as well as staffing levels, staff capacity and training needs. In addition, any future project that involves access restrictions and their enforcement will implement the lessons of REGROW.

### **Steps relating to the Bank's overall portfolio**

63. For all new engagements that support law enforcement efforts in protected areas and/or which may restrict people's livelihoods by limiting their access to natural resources, the Bank is applying the lessons of REGROW. Where necessary, task teams will ensure that thorough institutional assessments for counterparts involved in project activities are undertaken, and standard operating procedures (SOP), Codes of Conduct (CoC) and Action Plans are developed to define the obligations of the staff of project implementation agencies in alignment with the Bank's environmental and social requirements as well relevant international best practices. In addition, the Bank will ensure that borrowers develop a Process Framework that establishes resource management parameters among communities and the government as well as multi-stakeholder mechanisms to resolve potential disagreements or conflicts.

64. Management has reviewed the Bank's 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. In the East and Southern Africa portfolio, Management has identified several relevant projects. Each one has been reviewed to determine which measures are needed to fully apply the lessons of

REGROW. This review confirms that many risk mitigation measures are already in place but also identifies additional risk mitigation measures that are now being adopted (e.g., strengthening GRMs, incident reporting, enhanced due diligence and institutional assessment). A global review has identified projects in the active portfolio in other regions which will now be reviewed and retrofitted as necessary.

65. Based on the key lessons learned from REGROW, the Bank plans to conduct Environmental and Social Risk Management training for Bank teams and government project teams Bank-wide. The training will emphasize *ex ante* assessments and risk mitigation measures that must be built into projects based on the REGROW experience, as well as project supervision and implementation.

**Lessons for the design and supervision of future projects supporting or involving national parks and/or protected areas**

66. Based on its review, the Bank has identified several lessons regarding projects of this nature. These insights have since undergone further analysis and discussion, also incorporating findings from the Panel investigation, to ensure a comprehensive understanding of the challenges and to identify best practices. This process also includes the rollout of staff guidance and targeted training, which will better equip teams involved in the planning, preparation, and oversight of similar projects in the future.

67. ***As required by the Environmental and Social Framework, greater attention should be paid to establish robust Process Frameworks to regulate access to restricted natural resource areas and associated resources in a manner that addresses potential negative impacts on communities.*** These are essential tools for addressing disagreements and potential conflicts around access to such protected areas or national parks. They can provide structured, transparent, and inclusive mechanisms to identify, address, and resolve disputes while balancing conservation priorities with the needs of different stakeholders. Inclusive participation processes can help ensure that all relevant parties—local communities, indigenous groups, government agencies, businesses, and conservation organizations—are identified and included in such discussions. These processes should involve local communities whose cultures or livelihoods are closely tied to the land. Early and ongoing engagement helps foster mutual understanding; reduces the risk of conflicts; establishes clear rules for access; and enables agreements on usage and management of protected areas, minimizing misunderstandings. Adaptive zoning within protected areas, for example, can allow for multiple uses that balance conservation priorities with the needs of local communities. Process Frameworks should provide clear, transparent guidance on accessing and managing park resources. To further reduce conflicts and potential confrontations, the frameworks should include mechanisms for facilitated dialogue and mediation, which can allow stakeholders to discuss concerns in a neutral setting, enabling communities and other parties to voice their issues and seek resolutions before tensions escalate. Robust monitoring and GRMs should help ensure that communities have the ability to flag concerns or deviations from the agreed process.

68. ***Where national laws prohibit individuals from living within or accessing national parks or protected areas, this aspect should be taken into account when deciding whether***

***the Bank should support such projects, and the conditions under which support can be provided.*** In such cases it will be essential for the Bank to assess whether a sustainable solution can be identified that aligns with Bank policies. However, if no viable solution can be found that satisfies both the Bank's requirements and the legal framework governing the park, the Bank may ultimately decide that the inclusion of the specific national park in the project is not feasible.

69. ***Bank-financed projects that aim to support the improved management of protected areas, such as national parks and wildlife reserves, often require a degree of support for law enforcement measures.*** These initiatives, which might include strengthening the capacity of local authorities to monitor and enforce conservation laws, can be essential in preventing activities like poaching, illegal logging, or unauthorized land use within protected zones. However, the involvement of law enforcement brings with it a distinct possibility of confrontations with individuals or groups who may resist conservation regulations. In some cases, the enforcement of these rules might require the legitimate and lawful use of force, which raises complex and significant risks. These risks must be carefully considered and assessed during the project's planning and preparation stages. This assessment process is essential for the Bank to make informed decisions on the viability of such projects and to evaluate whether the associated security risks can be managed effectively within the project's framework and in accordance with Bank policies.

70. ***The Bank should proactively discuss these security-related challenges with the borrower (typically the government or organization responsible for managing the project).*** Addressing potential security risks proactively enables both the Bank and the borrower to establish a clear understanding of any sensitive or unresolved legacy issues, such as prior disputes over land rights or unresolved claims from affected communities. These discussions provide a foundation for designing effective risk management strategies that can anticipate, mitigate, and manage potential security challenges in the project area.

71. Furthermore, for such projects, the Bank should require the establishment of a system to regularly receive and review information about security-related incidents that occur within the project's area. This system should define exactly what type of incident is reportable (location, people involved, type of encounter), and give a precise timeline for reporting, developing root cause analyses and implementing corrective actions if necessary. Such a review process will help monitor the effective operation of the Process Framework and the safeguards and risk management systems in place, and promote the responsible pursuit of the project's objectives. By monitoring participatory processes and potential incidents and tracking responses, the Bank will be able to work closely with the borrower to address emerging issues and determine whether additional platforms of engagement and risk mitigation measures may be required. This ongoing communication allows the Bank to remain responsive to the evolving nature of participatory processes and security dynamics within the project area and to take corrective action if necessary.

72. Given the complex and sensitive nature of projects of this type, additional institutional assessments of the implementing agencies or entities will often be required. These assessments are designed to evaluate the capacity of the agencies to engage in meaningful participatory processes, manage potential security risks effectively, and

implement mitigation measures consistently throughout the project lifecycle. If the Bank ultimately decides to proceed with support for such a project, it will likely be necessary to prepare and implement a range of mitigation measures. These may include the development of procedures for engagement, grievance redress, conflict resolution, incident response, worker training on handling potential conflict and confrontations, and strategies for collaborating with local communities to reduce conflict. These measures will also guide project teams on maintaining a balance between promoting participatory processes, enforcing conservation policies and ensuring that community rights and safety are upheld.

73. By incorporating such measures, the Bank aims to support the sustainable management of protected areas in a way that respects both ecological goals and the rights of local communities, while ensuring that security risks and the potential for conflict are managed responsibly and transparently. Interim guidance was issued to Bank staff in January 2025, while a more comprehensive Good Practice note is being developed.

**Specialized Bank staff training on environmental and social risk management of future projects supporting or involving national parks and/or protected areas**

74. Management is also expanding its staff training program on the Environmental and Social Framework (ESF), which is provided by the Operations Policy and Country Services team, to include a dedicated module focused on national parks and protected areas. This new module, which is based on the interim guidance referred to in paragraph 73, is designed to enhance the capacity of staff working on projects related to these ecologically sensitive areas. It covers a range of important topics, including the identification and management of typical risks associated with such projects.

75. The module aims to provide detailed, practical guidance to staff on applying the Bank's policy requirements to manage risks specific to these protected environments. This includes training on the mitigation of broader community impacts and risks relating to the enforcement of park rules and access restrictions through participatory processes and mechanisms for conflict prevention and management. This addition to the ESF training program reflects Management's commitment to equipping staff with the knowledge and tools necessary to help borrowers manage the environmental and social risks in projects involving national parks and protected areas.

## V. MANAGEMENT'S ACTION PLAN IN RESPONSE TO THE FINDINGS

76. Management undertook significant efforts to engage with the Requesters regarding the proposed MAP. These efforts, whose length and depth extended significantly beyond the typical consultation process for MAPs in Inspection Panel cases, involved a series of communications with the Requesters and consultations with their advisors, the Oakland Institute.

77. The discussions about the proposed MAP actions were complicated by the fact that the Requesters, as relayed by the Oakland Institute, had a very different understanding of the Project's objectives and scope, as well as of the activities supported by the Project. This difference in understanding could not be addressed without a detailed dialogue and discussion with the Requesters, which could not take place in spite of repeated attempts and offers by Management.

78. Based on the Requesters' continued assertion that the Project was responsible for the expansion of the Park boundaries, they – through the Oakland Institute – put forth demands that far exceed the Panel's findings and go beyond the Bank's mandate altogether. Specifically, they demanded that the MAP contain actions to: *(a) remove Park beacons and officially revert park boundaries to the 1998 borders, (b) provide compensation for cattle seizures and related fines issued, (c) provide financial compensation to farmers for the loss of agricultural production for three seasons, (d) provide compensation for victims involved in violent confrontations with TANAPA rangers, (e) establish a multistakeholder independent mechanism to oversee reparations, (f) restore services to villages impacted by GN 754, (g) construct Luhanga Secondary School and provide teachers, (g) reopen Mlonga Primary School closed in 2022, and (h) ensure all villages within GN 754 boundaries are provided with the power, water, and social services.*

### *Chronology of engagements*

79. Management initiated engagement well in advance of the Panel issuing its Investigation Report. Initial telephone conversations between the Bank and Oakland Institute took place on May 28, June 15, August 11, August 13, September 9, November 2, and November 6, 2024. These discussions served to establish a foundation for collaboration and provide preliminary information about the proposed MAP and the related process.

- On November 12, 2024, Management formally invited the Requesters to participate in consultations on the draft MAP. To maintain their anonymity, the invitation was relayed through the Panel, which served as an intermediary. The Requesters confirmed receipt of the invitation on November 18, 2024.
- On November 29, 2024, a consultation meeting on the draft MAP was held via teleconference, with participation from both the Requesters and the Oakland Institute. Prior to the discussion, a written copy of the MAP was shared with the Requesters on November 26, 2024, to allow sufficient time for their review.

- On December 4, 2024, Oakland Institute responded stating that they had shared the draft MAP with the Requesters and the communities, and relayed written questions requesting a response from the Bank.
- On December 15, 2024, the Bank offered a follow-up meeting to respond to the issues raised and to discuss the MAP with the Requesters.
- On December 16, 2024, Oakland Institute responded with additional written questions but did not engage on the meeting proposal.
- On December 18, 2024, the Bank repeated its offer for a meeting to discuss the MAP with the Requesters and any questions they might have.
- On December 20, 2024, Oakland Institute relayed a list of written demands stating that those came from the Requesters and outlining recommendations and questions for the MAP.
- On December 26, 2024, the Bank responded, expressing appreciation for the Requesters' views and offered again to meet and discuss the MAP, as the questions indicated the need for broader clarifications regarding the Project's scope and objectives, and the activities supported by the Project.
- On December 27, 2024, another written submission was received from Oakland Institute stating that the Requesters would agree to have a call with the Bank, once they had received a written response to their demands.
- On December 29, 2024, the Bank responded, assuring that it would be glad to discuss the written demands in a consultation meeting.
- This meeting ultimately took place on January 5, 2025, but only the Requesters' advisors, the Oakland Institute, participated. The Oakland Institute stated that the Requesters had chosen not to attend. While Management had requested their inclusion in the discussion, the Oakland Institute indicated that the Requesters did not wish to engage.
- To confirm whether the Requesters no longer wished to engage in the consultation process, Management sent a follow-up message to the Requesters via the Inspection Panel on January 8, 2025. The message reiterated Management's willingness to meet with the Requesters to provide further clarifications or address any unresolved concerns, ensuring that all necessary precautions would be taken to protect their anonymity and safety.
- In their response on January 13, 2025, the Requesters asked for additional written clarifications before considering further engagement. On January 27, 2025, the Bank provided these clarifications to the Requesters through the Panel and Oakland Institute.

- On January 31, 2025, Oakland Institute responded by expressing its disagreement with the answers provided by the Bank and stating that both the Requesters and Oakland Institute rejected the MAP.
- On February 7, 2025, the Bank reached out again to Oakland Institute to follow up on the meeting offer. The same day Oakland Institute responded and criticized the consultations carried out on the ground for the proposed Trust Fund- and IDA-financed projects, which are a part of the MAP, as an attempt to “separate” the Requesters from the broader community.
- On February 10, 2025, the Bank shared with the Requesters the feedback received from local communities during consultations on the two proposed projects and reiterated its invitation for the Requesters to participate in further MAP consultations.
- On February 12, 2025, Oakland responded by criticizing the Bank’s handling of the REGROW Project, alleging that affected communities were neither consulted on nor accepted the Project, which in their view led to land theft, loss of farms and livestock. The communication further complained that the Bank would not address the demands raised earlier by the Requesters. It also stated that the communities would “*denounce and reject*” the consultation process and the MAP, which they considered flawed.

### *Consultation feedback*

80. 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.

81. In addition, to ensure that the proposed actions in the MAP are responsive to needs in the area, Management also conducted consultations with the broader community regarding the proposed new projects. As outlined in Annex 2 below, these consultations indicated strong support for the proposed projects.

82. The following summary was shared by Oakland Institute, which said that it was relaying feedback from the Requesters and “the Mbarali Communities.” Management sought to incorporate the Requesters’ feedback, as relayed by the Oakland Institute, into the revised MAP where possible, however, their demands exceeded the scope of the Panel’s findings, the Project’s scope and the Bank’s mandate, as explained below.

83. **Revising the RUNAPA Boundaries.** The Requesters, as relayed by the Oakland Institute, demanded that the park boundaries be reverted to its pre-2008 boundaries, well before the Project commenced. Management clarified that the Park's extension was unrelated to the Project and occurred well before its initiation. Moreover, the Bank has no authority to alter park boundaries, as this is the prerogative of the sovereign Government.

84. **Guarantees Against Future Resettlement.** 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.

85. **Risk of Physical Displacement.** 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. Management committed to discussing with the Government of Tanzania allegations regarding disrupted access to services (e.g., halted school construction or electricity connections).

86. **Livelihoods Support.** 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.

87. **Compensation for Farmers and Herders Affected by Cattle Seizures.** 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. Although the Bank should have recognized the Park extension as a risk at the outset of the Project, and assessed this risk as part of Project preparation and implementation, the expansion itself was a Government initiative not caused by the Project, and the Bank has no role in altering the Park boundaries.

88. 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.

### *Conclusion*

89. Overall, the consultations revealed significant barriers to dialogue, including the Requesters' preference not to engage or respond directly, and demands exceeding the Project's scope, Panel findings and the Bank's mandate. Nevertheless, Management believes the MAP that follows addresses the specific findings presented in the Panel's report and provides meaningful support to local communities in and around RUNAPA.

### *Community-based consultations*

90. Substantial consultations have also been conducted directly with the communities affected by the activities planned under the Trust Fund and the proposed IDA operation, the "Scaling-up Locally Led Climate Action Program (SCALE)" (see also Annex 2). These consultations, some of which occurred in and around RUNAPA, were designed to gather a wide range of stakeholder perspectives on the challenges posed by climate change, and collaboratively develop solutions tailored to regional needs. The consultation process incorporated a variety of interactive and participatory methods. These included presentations by representatives from the Bank and Government, thorough desk reviews, on-the-ground field visits, open discussions, question-and-answer sessions, and Focus Group Discussions (FGDs). Systematic collection of feedback and participant insights was achieved with the help of Civil Society Organizations (CSOs). These consultations, which centered on the proposed new operations, represented an initial step in the process. Further engagement and dialogue with the affected communities will be conducted to ensure their perspectives and concerns are thoroughly addressed.

91. The table below lays out the actions that the Bank has agreed with the Borrower in response to the Panel findings.

Issue/Finding	Borrower Action	Management Action
<p>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).</p>	<p>The Borrower will work with the Bank to support communities in and around RUNAPA in an effort to balance conservation and development, including reducing incidences of conflict and violence in the Park and providing alternative livelihoods.</p> <p>This will involve:</p> <p>(a) <b><i>The establishment of a project financed by a Trust Fund, which has been developed independently from the REGROW objectives and scope. It will include support for alternative livelihoods prioritized by communities in the villages and sub-villages inside RUNAPA and some communities around the Park.</i></b> The project is supported by a US\$ 2.8 million grant from the Trust Fund. The project will be implemented by the Rufiji Basin Water Board (RBWB) assisted by a reputable local NGO to be identified. The communities of focus will be 45 vulnerable villages in Mbarali District, including the five villages and several sub-villages inside RUNAPA. The Project Development Objective is to promote community-led solutions to climate change adaptation in the Usangu Catchment.</p> <p>Targeted beneficiaries include community groups, water user associations, smallholder farmers, and livestock keepers. Activities include alternative livelihoods, and a range of services (for empowerment, awareness raising, legal information, psycho-social support, etc.).</p> <p><b><i>Date: Project approved by February 2025</i></b></p>	<p>(a) Providing technical support to the Borrower for the preparation and submission of the project proposal to secure financing for these activities.</p> <p><b><i>Date: February 2025</i></b></p>

	<p><b>(b) <i>The preparation of a new IDA-financed operation that will scale up locally led community climate actions and support alternative livelihoods.</i></b></p> <p>The proposed Program will help address adverse effects of environmental degradation and conservation, through scaling up locally led community climate actions by supporting livelihood activities developed based on participatory processes involving the communities. The operation is under preparation and is being prepared for Board consideration in FY25. While national in scope, it will build upon support provided under the Trust Fund grant to vulnerable communities in the Usangu Catchment, including Mbarali District.</p> <p>The design of this operation will be based on participatory processes including a socio-economic assessment of the relevant communities carried out in consultation with the residents of villages affected by livelihood restrictions. The operation will also include the updated GRM. The community-based activities under this operation will support livelihood activities identified in consultation with communities, including micro-finance, community forestry, clean cooking, and will be supported by legal information, social services and community empowerment, among others.</p> <p><b><i>Date: June 30, 2025.</i></b></p>	<p>(b) Provide technical support to the Borrower for the preparation of the proposed IDA operation for Board consideration.</p> <p><b><i>Date: June 30, 2025</i></b></p>
	<p>(c) The Borrower will maintain the strengthened GRM (comprising GRCs, toll free lines and the Government’s digital complaints platform). The GRCs have been strengthened through training, adherence to the updated GRM Manual and continuous dissemination of IEC materials.</p> <p><b><i>Completed: November 6, 2024</i></b></p>	<p>(c.1) Management will confirm that a strengthened GRM is in place through GRM reports (number and types of grievances lodged and addressed).</p> <p><b><i>Completed: November 6, 2024</i></b></p> <p>(c.2) Management will set up and maintain the Country Office hotline and email (“Tanzania Alert”) for additional grievance</p>

		<p>reporting in relation to its lending portfolio. <b>Completed: June 25, 2024</b></p> <p>(d) The Borrower will submit a report on implementation of the GRM. <b>Completed: November 6, 2024</b></p> <p>(e) The Borrower will confirm that the communities inside RUNAPA will not be resettled in the foreseeable future. <b>Completed June 26, 2024</b></p>
<p>Assessment of the Implementing Entity’s Capacity and Consideration of Human Health and Safety; and Social Aspects as a result of Project Activities ...Panel finds the Project is not in compliance with the IPF Policy, paragraph 5, which requires the Bank to assess the appropriateness of the needs and capacity of the borrower and any project implementation entity. The Panel also finds the Project is not in compliance with the Bank’s Environmental Assessment Policy, OP 4.01, paragraph 3, which requires a project to take into account human health and safety and the institutional capabilities related to the environmental and social aspects.</p>	<p>(a) 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. <b>Date: May 31, 2025</b></p>	<p>(a) 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. <b>Date: May 31, 2025</b></p> <p>(b) Management will prepare an Interim Guidance Note on Managing the Risks of Projects Involving Protected</p>

Areas. The Note will promote sustainable management of protected areas in a way that addresses both ecological goals and the rights of local communities, while ensuring that security risks and the potential for conflict are managed responsibly during project preparation and supervision.

**Completed: January 30, 2025**

(c) Based on the Interim Guidance Note, Management will prepare a more comprehensive Good Practice Note on the same topic.

**Date: December 31, 2025**

(d) Management will design and deliver staff training program on the Environmental and Social Framework (ESF), to include a dedicated module focused on national parks and protected areas. This new module, which is based on the Interim Guidance Note referred to above, is designed to enhance the capacity of staff working on projects related to these ecologically sensitive areas. It covers a range of important topics, including the preparation of Process Frameworks, and the identification and management of risks related to the enforcement of access restrictions. It will include training on the mitigation of broader community impacts

		<p>and risks relating to the enforcement of park rules and access restrictions through participatory processes and mechanisms for identifying sustainable livelihoods, and for conflict prevention and management.</p> <p><i>Date: May 31, 2025</i></p>
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## VI. CONCLUSION

92. Management believes that the proposed Action Plan contained in this Report addresses the Panel's findings.

**ANNEX 1  
FINDINGS AND RESPONSES**

No.	Finding	Response
<b>Involuntary Resettlement</b>		
1.	<p><b><i>Identification of Project’s Area of Influence</i></b></p> <p>The Environmental Assessment Policy requires evaluation of a project’s potential impacts in its area of influence, which it defines to include areas used for livelihood activities (hunting, fishing, grazing, gathering, agriculture, etc.). <b>The Panel finds Management’s definition of the Project area of influence to include the four park areas and their surroundings is in compliance with OP 4.01, Annex A, paragraph 6.</b></p>	<p><b><i>Management notes the Panel’s finding of compliance.</i></b></p>
2.	<p><b><i>Environmental Assessment and Consideration of Social Aspects.</i></b></p> <p><b>The Panel finds that the Project documents 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 Panel finds 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.</b></p> <p>The Panel notes that in March and April 2024, Management visited some of the five villages to understand better the social risks facing them.</p>	<p><b><i>Management agrees with the Panel’s finding that Project documents did not adequately identify the extent of human settlement within the southern part of RUNAPA.</i></b></p> <p>Indeed, as explained in the second Management Response, at the time of Project preparation, the Bank was aware that several villages were located within RUNAPA but it did not gather sufficient information to determine the location and size of the villages, nor did it sufficiently identify the livelihood sources of village residents. <b><i>To the Bank’s knowledge, since Project appraisal and to date, no physical resettlement has taken place. However, the potential relocation of the villages from within the Park following the Park extension was never ruled out by the Government, and hence remained a possibility throughout the Project’s life.</i></b> Although the Government had expanded RUNAPA in 2008 in a way that caused several legally registered villages to become located within the boundaries of the Park, the Project was not intended, nor required, to resettle those villages or to support the Park’s extension.<sup>1</sup> During Project preparation in 2017, the Bank identified the possibility that these villages might be relocated in the</p>

<sup>1</sup> Inspection Panel Investigation Report, paragraph 223, observes that “while the early Project concept focused on improving watershed management of the Greater Ruaha River in southern RUNAPA, during Project preparation the focus shifted towards park management.” Management wishes to clarify that watershed management remained part of the Project activities.

No.	Finding	Response
		<p>foreseeable future but relied on government officials advising that such resettlement was unlikely to occur during the life of the Project.</p> <p><b><i>Prior to the suspension of the Project, the Bank re-assessed the Project area of influence and acknowledged that villages and sub-villages that were located inside RUNAPA could potentially be impacted by improved park management and park boundary enforcement activities.</i></b> The Bank therefore reviewed Project-related social aspects and initiated work to support the Borrower to update the ESMF, and SCDP to take into account social risks, including the economic displacement of households residing in the Project area. The updates to these documents also reflect the expansion of the Project GRM in the southern part of RUNAPA to ensure that affected villages and sub-villages inside RUNAPA share a platform for management of possible complaints that may arise out of park management/ enforcement as well as resettlement-related activities.</p>
3.	<p><b><i>Involuntary Resettlement from Land Take</i></b></p> <p>The Panel observes that project documents reported earlier efforts of resettling people out of RUNAPA based on GN-28, and that these had been discontinued. The Panel, therefore, observes that the Bank was aware of the legacy issues but did not gather sufficient information on the villages and sub-villages remaining within the Park and the livelihoods sustained by Park resources. Without such information, the Bank was unable to identify the extent of the livelihoods impacts resulting from enforcement of Park boundaries.</p> <p>The Panel observes that during project implementation there was evidence of resettlement planning for communities living in the Park. The Panel further observes that the Government and the Bank had agreed that any resettlement taking place</p>	<p><b><i>Management did not take notice of some incipient resettlement activity when, in April 2023 the Oakland Institute’s letter addressed to the Bank referred to the MLHHS Minister’s October 2022 speech indicating a plan to pursue resettlement in the Project area.</i></b></p> <p>Similarly, in October 2023, Management was copied on a letter from the Government to the Executive Director representing Tanzania, which stated that (i) the Government had begun identifying houses and assets in several villages in RUNAPA as one of the early steps of a resettlement process; and (ii) a new Government Notice (GN) 754/2023<sup>2</sup> was issued by the Government superseding GN28 and redrawing RUNAPA’s boundaries. At that point – after submission of the first Management Response – it became clear that the Government intended to pursue the preparatory activities to resettle communities from inside RUNAPA based on the redrawn official park</p>

<sup>2</sup> GN754/2003 was issued on October 20, 2023. The new GN754 redrew the official boundaries of RUNAPA and reduced its extension by 404 km<sup>2</sup> (from 20,226 km<sup>2</sup> to 19,822 km<sup>2</sup>), thereby carving out twenty-seven (27) villages that were previously located inside the Protected Area, in an attempt to reduce conflict and minimize potential resettlement. Despite this commendable effort by the Borrower, at least 5 villages and 39 hamlets, pertaining to other villages contiguous to the Park, remained within new park boundaries and, accordingly, susceptible to resettlement.

No.	Finding	Response
	<p>in the Park during the life of the Project would comply with the Bank’s Involuntary Resettlement Policy. The Panel notes that for non-Project related resettlement in the Project area the RPF was to be used on a voluntary basis for Government-sponsored involuntary resettlement activities. The Panel observes that in this case, and in the context of park management across RUNAPA, the application of the resettlement instruments is mandatory for all involuntary resettlement and/or loss of assets or access to assets and livelihoods within the Project area during the life of the Project, even if Project documents state that it is voluntary.</p> <p>The Panel finds that while a RPF was prepared for the Project, early resettlement activities were underway without its use or the application of other Bank Involuntary Resettlement Policy provisions relating to physical resettlement. The Panel finds this is not in compliance with OP 4.12, paragraph 3(a).</p>	<p>boundaries. The letter also acknowledged that a valuation process was underway to compensate the residents of the affected villages and that the Government had set aside land to be re-allocated to them. Despite these indications, Management failed to take immediate notice and proper action. During a supervision mission that took place in December 2023 Management again reiterated to the Government its legal obligation to follow the RPF, without making any reference to the Government’s October 2023 letter or the new GN754.</p> <p>In March-April 2024, a Bank team visited some of the communities remaining inside RUNAPA. The difficult access due to seasonal floods and large footprints of the villages meant that it was not possible for the Bank to visit all five villages in the time it had available. The team visited one village and a sub-village of a second one, where it saw evidence, confirmed by Government officials, that official meetings and a process of identification of assets in those villages had begun. The Bank was also informed by Government officials that resettlement planning had re-commenced early in 2022 after it had previously stalled. However, the Government had not applied the provisions of the RPF (e.g., notifying the Bank on resettlement plans, and initiating resettlement plan preparation, baseline census and socio-economic survey) in these preparatory steps as required under the Financing Agreement and RPF.</p> <p>In light of this information, on April 17, 2024, the Bank invoked its contractual remedies under the <b><i>Financing Agreement and suspended disbursements as of April 18, 2024</i></b>. The suspension was followed by a high-level Bank mission to Tanzania in April-May 2024, where Management met with representatives of the Ministry of Finance, MLHSD, MNRT, Mbeya Region and Mbarali District, to discuss the Government’s resettlement plans, GRMs and incident reporting systems, among other issues.</p> <p>In a letter dated June 18, 2024, signed by the Minister of Finance, the Government stated that it had no intention to continue the process of resettling communities from RUNAPA in the foreseeable future and that no communities had been physically resettled so far despite the initiation of preparatory steps. In another letter dated June 26, 2024, the Government</p>

No.	Finding	Response
		<p>confirmed once again that all resettlement activities had been stopped, including stock-taking, asset marking and valuation, and further committed to make its position public, including clarifying the scope of economic activity that can be carried out by the villagers living within RUNAPA.</p> <p>A Bank team visited the remaining villages within RUNAPA on June 18–20, 2024, and met with groups of 50 to 300 villagers in each village, including village leadership and sub-village heads. The Bank mission did not observe any ongoing resettlement activities on the ground. The villagers consulted said that although public notification of intention to acquire land (e.g., through public meetings and notices) and asset identification activities (e.g., distribution of inventory forms) were initiated at one point, no one had been relocated or involuntarily displaced, and the communities were continuing with their livelihood activities. In two villages, some residents stated that TANAPA was unclear on the location of the boundaries between the village land and the Park, though Management was not able to confirm this further. Schools and public services also appeared to be functioning normally, and power lines and cellphone towers were in place.</p> <p><b><i>In July 2024, Management received confirmation of media announcements, including newspaper articles and video clips from Tanzania’s national news outlets, acknowledging that the communities inside RUNAPA were not being resettled and could continue with their livelihoods.</i></b><sup>3</sup> These media reports echoed official communications shared by district authorities at community level.</p> <p>The Project GRM was strengthened to receive any complaints related to potential park management and resettlement-related impacts for the villages and sub-villages inside RUNAPA. In July and August 2024, Bank missions provided training to the regional, district, ward and village government officers, as well as the existing Village GRCs, on the strengthened GRM. The update was intended to ensure that GRCs in</p>

<sup>3</sup> Tanzania Times: “Five Villages in Mbarali Allowed to thrive on seceded part of Ruaha National Park.”  
 Link: <https://tanzaniatimes.net/news-ruaha-national-park-allows-five-villages-to-thrive-on-its-seceded-parts/>; Mwananchi: “Only Five villages remain in Ruaha from 33.”  
<https://www.mwananchi.co.tz/mw/habari/kitaifa/vijiji-ndani-ya-ruaha-vyabakia-vitano-kutoka-33-4682640>.

No.	Finding	Response
		<p>the expanded GRM take into consideration REGROW-specific grievances as part of their existing mandate. The GRM was further reinforced with additional grievance uptake channels, including seven toll free lines and the Government’s e-mrejesho (<a href="https://emrejesho.gov.go.tz">https://emrejesho.gov.go.tz</a>) platform. Information about the GRM was also extensively disseminated in the southern region through IEC materials and media broadcasting. At the Bank’s Tanzania country office, a hotline and email address were established to receive and manage grievances. In addition, the Bank engaged a firm to provide media monitoring services to ensure that the Bank is promptly notified of any public information signaling or suggesting the re-initiation of resettlement activities inside RUNAPA.<sup>4</sup></p> <p>The GRM Manual, to which the GRCs are required to adhere, has been updated and an addendum provided for the villages and sub-villages inside RUNAPA. This includes the following provision: <i>“All grievances will be received and managed confidentially; and that complainants will be protected in accordance with the law. Anyone that threatens (any threat to) complainants will be prosecuted in accordance with the law of the land.”</i></p> <p>Management notes the finding on non-compliance with Para 3(a) of OP 4.12, and acknowledges that it did not adequately assess legacy issues related to past efforts of the Government to physically relocate people outside the Park.</p>
4.	<p><b><i>Involuntary Resettlement – Restriction of Access to Legally Designated Parks</i></b></p> <p>The Panel observes that although the Project included a Process Framework, until March 2024 Management did not identify that Project support to park management would increase the enforcement of restriction of access with implications for livestock grazing and other resource uses from within the Park. Moreover, the Project’s Process Framework was not designed to cover the Project area in its entirety nor was it used to help mitigate negative impact on</p>	<p><b><i>By focusing selectively on some Project areas, the Bank did not consider the potential impacts of improved park management on the livelihoods of all communities in and around the Project-supported parks.</i></b> The Project undertook significant efforts to assess the situation of a subset of communities surrounding the Project-supported parks to gauge the impact of the enforcement of access restrictions on them and to address those through targeted livelihood support. To address this potential impact, the Project allocated US\$ 17 million to benefit 61 villages around the Project-supported parks, which were identified based on several criteria, including being “hot spots”</p>

<sup>4</sup> The consulting firm is providing monitoring of any incidents related to all four national parks as well as additional information on past incidents.

No.	Finding	Response
	<p>livelihoods. <b>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).</b></p>	<p>for poaching. A secondary objective was to mitigate the impacts resulting from TANAPA’s curbing of illegal livelihood activities inside the parks under Component 1. Component 2 of the Project included financing for education, training, small businesses and recruitment of village members to be Village Game Scouts who help prevent poaching and human-wildlife conflict. The Component (within its limited geographic scope) has been implemented successfully. The targeted communities therefore have significant incentives to not encroach or illegally use park resources. Still, the support under Component 2 was limited to these selected beneficiary villages, whereas a Process Framework governing resource access, as well as the GRM, should have covered all other communities in and around all four Project-supported parks.</p> <p>Management acknowledges the Panel’s finding of non-compliance with OP 4.12 paragraph 3(b), which covers direct economic and social impacts that both result from Bank-assisted investment activities and are caused by the involuntary restriction of access to legally designated parks and protected areas that adversely affect the livelihoods of the displaced persons.</p> <p>As explained in the second Management Response, the Project aimed at improving park management, which can result in restricted access to park resources. While TANAPA’s mandate includes guarding against the unauthorized use of park resources, raising cattle and fishing are basic livelihood activities for some communities that have lived in and around the national parks for decades, even though those activities are illegal inside the parks. By focusing selectively on some Project areas, the Bank did not consider the potential impacts of improved park management on the livelihoods of all communities in and around the Project-supported parks.</p> <p>The Panel concluded that the Bank failed to consider that support towards enhancement of law enforcement in park management directly leads to restrictions of access for local communities to resources in legally designated parks. While this risk was considered by the Bank, Management acknowledges it was not adequately assessed and mitigated. As the Panel noted and Management explained in the second Management</p>

No.	Finding	Response
		<p>Response, the PAD, the ESMF and the Process Framework all indicated that the Project would enhance TANAPA’s ability to enforce park rules and reduce the illegal use of park resources, including grazing. The PAD stated that a Process Framework would be applied as a precautionary measure to the extent that surveillance activities would “marginally contribute” to increasing existing restrictions of access, with a focus on communities where illegal activities were prevalent. However, the Process Framework did not cover any villages outside of Component 2 and was silent on how enforcement activities could restrict communities’ livelihoods and potentially exacerbate tensions in all villages nearby the parks, or inside it. That said, the ESMF did note tensions between villages inside the Park and TANAPA. Other analysis pointed to community members’ complaints about periodic raids by park rangers, cattle seizures, contested boundaries and rangers firing warning shots during confrontations with herders. A Project GRM, as well as a comprehensive Process Framework establishing resource management parameters covering all relevant villages adjacent to all four Project-supported parks, should have been put in place.</p> <p>The Project undertook significant efforts to assess the situation of a subset of communities surrounding RUNAPA to gauge the impact of the enforcement of access restrictions on them and to address those through targeted livelihood support. To address this potential impact, the Project’s Component 2 allocated US\$ 17 million to benefit 61 villages around the Project-supported parks, which were identified based on several criteria, including being “hot spots” for poaching. A secondary objective was to mitigate the impacts resulting from TANAPA’s curbing of illegal livelihood activities inside the parks under Component 1. Component 2 of the Project includes financing for education, training, small businesses and recruitment of village members to be Village Game Scouts who help prevent poaching and human-wildlife conflict. The Component (within its limited geographic scope) has been implemented successfully. The targeted communities therefore have significant incentives to not encroach or illegally use park resources. Still, the support under Component 2 was limited to these selected beneficiary villages, whereas a Process</p>

No.	Finding	Response
		<p>Framework governing resource access, as well as the GRM, should have covered all other communities in and around all four Project-supported parks.</p> <p>Since the second Management Response, Management has confirmed that the Government expanded the GRM beyond the villages directly supported by the Project. The Panel reported that it was informed by the Government that the GRM expansion would be limited to the five registered villages within RUNAPA. Management confirms that the GRM has in fact been expanded not only to the villages directly supported by the Project but also to all 5 villages and 39 sub-villages inside RUNAPA. Further, IEC materials developed on the GRM that include information on the availability of GRCs, toll-free lines and the Government’s digital complaints platform have been disseminated widely to all villages within and around RUNAPA and the broader Project area. The Bank team observed the training and expansion process of the GRM, and training of GRCs for all 5 villages and 39 sub-villages. During the April-May 2024 mission, the Bank had agreed with the Government that the subsequent extension of the GRM to all the remaining villages (210 in total, inclusive of the five villages in RUNAPA) adjacent to the four national parks supported by REGROW would take place in phases. Since the Project was closed by the Borrower, the strengthening of the GRCs was only accomplished in those five villages inside RUNAPA. However, information on the toll-free lines and the Government’s digital complaints platform has been disseminated in the broader Project area.</p> <p>The Bank had recommended that the Government update and expand the Project’s Process Framework to cover villages inside RUNAPA and relevant villages adjacent to the Project-supported parks. In light of the Project’s early closure, this Process Framework may not be updated.</p> <p>Instead, any potential impacts on communities’ livelihoods that were not mitigated through REGROW’s limited Process Framework will be addressed through the activities proposed under the new Trust Fund operation, which has been developed independently from the REGROW project objectives</p>

No.	Finding	Response
		and scope but has significant overlaps in its beneficiaries..
	<b>Park Management and Law Enforcement</b>	
5.	<p><b><i>Assessment of the Implementing Entity’s Capacity and Consideration of Human Health and Safety; and Social Aspects as a result of Project Activities</i></b></p> <p>The Panel observes that, during Project preparation, background information on serious incidents committed by TANAPA prior to the Project and in relation to restriction of access was publicly available. The Panel also observes that the Project identified existing and ongoing conflicts in RUNAPA, principally related to Park boundary changes and restriction of access. Furthermore, in November 2018, TANAPA officially adopted a paramilitary system.</p> <p>The Panel reviewed the capacity assessment of the Project’s implementing agencies conducted by the MNRT which the Project used to deem TANAPA’s capacity adequate. The Panel observes that this assessment did not evaluate TANAPA’s mandate and legal framework, its law enforcement role for the management of national parks, and the implications of its activities on the health and safety of community members. The Panel also observes that the Project’s lack of consideration of these aspects, especially as it was supporting patrolling with equipment, is a serious omission which led to no specific measures being identified to address potential weaknesses in TANAPA’s capacity.</p> <p>For these reasons <b>the Panel finds the Project is not in compliance with the IPF Policy, paragraph 5, which requires the Bank to assess the appropriateness of the needs and capacity of the borrower and any project implementation entity. The Panel also finds the Project is not in compliance with the Bank’s Environmental Assessment Policy, OP 4.01, paragraph 3, which requires a project to take into account human health and safety and the</b></p>	<p><b><i>Management acknowledged in the second Management Response that Project preparation and supervision did not sufficiently consider the implications of supporting TANAPA, a government agency with a law enforcement mandate that includes the use of force in certain circumstances.</i></b> The Project financed infrastructure and equipment to be used during TANAPA’s patrols, but consistent with Bank policy, it did not finance firearms or ammunition. Under Tanzanian law, TANAPA is authorized to use force in some limited circumstances to protect resources in the country’s national parks. This enforcement role entails encounters and sometimes confrontation between rangers and unauthorized users of park resources, such as poaching for wildlife trophies or bushmeat, or livelihood-related activities such as gathering of fuelwood or grazing of livestock. These encounters can become violent. The Project should have recognized that enhancing TANAPA’s capacity to manage the Park better could potentially increase the likelihood of conflict with communities accessing the Park, and should have identified measures to help prevent, promptly report, and mitigate such conflict. Such measures should have included enhancing TANAPA’s capacity to liaise with communities, conducting sensitization training, carrying out a security risk assessment, and preparing conflict de-escalation measures. In addition, the Process Framework should have provided for conflict-specific measures, to help reduce the likelihood of violent encounters.</p> <p><b><i>Prior to the start of the Project, TANAPA rangers already had a law enforcement mandate and a paramilitary structure.</i></b> Then, in 2018, TANAPA was included in the new Tanzanian Wildlife and Forest Conservation Service, together with other existing Government agencies, making the entire agency paramilitary. The Bank did not undertake an assessment of the new organizational structure and the</p>

No.	Finding	Response
	<p><b>institutional capabilities related to the environmental and social aspects.</b></p> <p>The Panel further observes that the Project provided equipment and infrastructure to improve TANAPA’s ability to patrol RUNAPA and to combat illegal activities, including cattle grazing. Given the history of conflict in relation to the management of and the restriction of access to national parks and other PAs, the Panel also observes that TANAPA personnel would be expected to engage people in RUNAPA and there could be associated risks of serious incidents occurring. The Panel observes that no mitigation measures to manage this risk were included in Project documents.</p>	<p>resulting changes for TANAPA’s operating procedures and practice.</p> <p><i>Management notes that cattle grazing in the national parks is a significant conservation challenge. TANAPA’s role under Tanzanian law is to seize such cattle, in order to protect the biodiversity of the national parks. This naturally is a source of conflict with the herders, and was not sufficiently considered during Project preparation. In addition, the Bank’s implementation support efforts did not adapt to the reality of these risks.</i> This was due to a strong focus on addressing wildlife poaching, which was rife at the time. The issue of herders entering the Park was not identified in the Project’s safeguard documents. Since then, TANAPA’s focus of attention has shifted from wildlife poaching to illegal grazing (also considered a poaching activity under Tanzania’s Wildlife Conservation Act), in light of the rapid increase in the number of cattle incursions into the parks. Conversely, wildlife poaching incidents have decreased.</p> <p><i>At Management’s request and pursuant to the suspension letter, TANAPA has updated the reporting protocols in the PIM and has reported to the Bank all registered incidents of cattle found illegally grazing in the parks and seized in accordance with applicable law since 2013 and up to the advanced Project closing date of November 6, 2024. Several incidents involve the confiscation of cattle, attempts by herders to recapture confiscated cattle and ensuing violence leading to injuries and fatalities of herders and occasionally also of rangers. A Bank team visited a stockade for confiscated cattle during its April-May 2024 mission to RUNAPA and observed that the process is complex and leaves both rangers and herders open to violence.’</i></p> <p><i>Desk review recommendations.</i> After the second Management Response, the Bank offered to work with TANAPA to help review and address the issues of concern regarding confrontations resulting from law enforcement efforts. The Bank engaged a firm with expertise in ranger security to conduct an evaluation of TANAPA’s institutional capacity and law enforcement rules and approach, as well as its training relating to de-escalation of conflict and human rights-based approaches. The Government confirmed its interest in</p>

No.	Finding	Response
		<p>getting support of this kind, but only after any eventual lifting of the Project’s suspension. Therefore, the firm helped the Bank conduct a desk-based evaluation in September-October 2024, which established a benchmark for assessing TANAPA, based on international best practices across criteria such as organizational structure, staffing, training, and applicable rules for use of force. This report has not been discussed with the Government, nor have any potential resulting recommendations been implemented, as the Project has closed. As noted in the MAP, however, the Government has agreed to convene a workshop to discuss international good practices in park management, including use of force in the enforcement of park rules. This report will be an important input into that workshop.</p> <p><i>Training.</i> The Bank’s advisory firm was to review TANAPA’s training programs, specifically with a focus on human rights training, community engagement and de-escalation, and to develop training materials to fill any gaps. However, the firm was not granted access to the TANAPA materials or officials necessary to conduct that review.</p> <p><i>Incident reporting.</i> As agreed with the Bank during the April-May 2024 mission, the Government established a protocol in the updated PIM for reporting to the Bank any serious Project-related incident. This protocol established the criteria for reportable incidents, outlined the steps to be taken when an incident occurred and against what timetable, including a root cause analysis and corrective actions. The Government confirmed that it has reported to the Bank all incidents meeting the established criteria that have occurred in any of the four Project-supported parks since Project effectiveness until Project closing. According to the Government, applicable protocols were followed for all incidents related to patrolling and law enforcement, and that those protocols were/are adequate and do not need to be revised.</p> <p><i>Review of incidents.</i> The Government reported several incidents to the Bank starting in 2023. The Bank has also been notified of alleged additional incidents either by third parties (e.g., NGOs, UNOHCHR Special Procedures) or through alternative channels (GRS, media and social media screenings, etc.). At the Bank’s request, the Government sent detailed</p>

No.	Finding	Response
		<p>information about cattle seizures and violent incidents that occurred throughout the implementation period of the Project up to closing on November 6, 2024. The Bank has reviewed and discussed all these incidents with the Borrower, as well as all additional incidents that have come to the Bank’s attention from other sources (i.e., the advisers to the Requesters, independent NGO reports, media and social media, and anonymous grievances lodged through the GRM and GRS). The Bank does not have a mandate to investigate the attribution of responsibilities for these incidents. Nevertheless, it has worked with the Government to review each one of them and to determine root causes and corrective actions.</p> <p>The level of detail about the incidents varies, and obtaining confirmation of facts is challenging. During the April-May 2024 mission, the Government shared with the Bank GPS locations self-reported by rangers, photographic evidence, and a more detailed account of what was alleged to have happened in several of the reported incidents. In other cases, however, the Bank received little additional or corroborating information, or none at all, and is therefore not in a position to verify whether the alleged incidents occurred as reported. The Bank has logged each incident in accordance with applicable internal Bank requirements. During the course of its incident reviews, the Bank purposely decided not to speak directly with affected people whose identities were known, because of community concerns about reprisals. Instead, the Bank conducted media and social media searches on each of the alleged events for which the Government did not have information or was unable to share additional information with the Bank. Some of the incidents had considerable media and social media coverage, while some had little and several had none.</p> <p>Neither Management nor the Panel has been able to confirm all of the details of violent incidents that were raised in the Request. As outlined in the Panel’s report, violent confrontations also predated the Project and are related to TANAPA’s law enforcement mandate and the way it manages the protected areas. While the Bank’s efforts to work directly with TANAPA on that issue have had limited success, Management has</p>

No.	Finding	Response
		<p>agreed with the Government on several actions that are detailed in the MAP.</p> <p>The Government informed the Bank that it has no information about the incidents relating to alleged criminal activities by rangers, with the exception of the incident of May 6, 2023. An official government enquiry of that incident presented to Parliament stated that it could not find evidence for burning of women, but that a man was injured in an altercation relating to cattle seizures. The Government enquiry stated that appropriate procedures were followed.</p>
6.	<p><b><i>Assessment of Project-related Risks Resulting from Park Management and Law Enforcement</i></b></p> <p>The Panel observes that the Project did not adequately consider that several registered villages, with thousands of people whose livelihoods depend on resources located inside the Park boundary, live in and around RUNAPA. The Panel also observes that the Project did not adequately consider the implications of pre-existing conflicts over the use of Park resources. The Panel further observes that the Project did not 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. <b>Therefore, the Panel finds that Management did not adequately assess the Project risks in the Project area of influence as they relate to these observations, which increased the exposure of communities to the potential use of excessive force by TANAPA rangers. As such, the Panel finds the Project is not in compliance with IPF Policy, paragraph 4, which requires a project to take into account social considerations, and related risks. The Project is also not in compliance with the Environmental Assessment Policy, OP 4.01, paragraph 2, and the Involuntary Resettlement Policy, OP 4.12, paragraph 3(b), as analyzed in Chapter 2, above.</b></p>	<p><b><i>During Project preparation, the Bank conducted a limited institutional assessment of TANAPA and other implementing partners. The assessment did not address risks related to conflict or the potential for disproportionate use of force.</i></b> The assessment recommended engagement of additional outreach workers to improve relations between TANAPA and local communities. This recommendation was implemented, and four outreach workers were hired to liaise with villagers in and around RUNAPA. The Project SCDP listed roles and responsibilities for TANAPA but did not examine TANAPA’s role in enforcing park rules or consider its track record, or lessons learned from past confrontations between rangers and communities.</p> <p>During implementation, but before Project-financed works began, Environmental Impact Assessments were prepared for each park to identify and mitigate risks associated with Project-financed activities. The Environmental and Social Impact Assessment for RUNAPA was produced in November 2022. It stated that if the rangers were not sensitized appropriately in community relations and awareness of human rights, situations could result in unrest or violence and conflict. It mentioned that TANAPA should develop policies to help rangers conduct community relations responsibly, with responses proportional to the threat. However, this recommendation was made in relation to security incidents on Project-financed construction sites, rather than incidents relating to the enforcement of park rules. Nevertheless, these recommendations were not implemented.</p>

No.	Finding	Response
		See Item 5 above on assessment of capacity, establishment of reporting system and review of incidents reported.
	<b>Project Supervision</b>	
7.	<p><b><i>Bank’s Supervision of the Project</i></b></p> <p>The Panel observes that the Bank undertook regular, biannual supervision visits. In addition, the Bank conducted four interim missions that reported progress on environmental and social implementation performance. The Panel observes, however, that although social specialists were included on missions, they narrowly focused on the implementation of Component 2 in the priority villages outside the national parks. The Panel also observes that after the allegations of TANAPA’s use of excessive force against community members were first made in April 2023 to Management, the composition of the Bank supervision team did not include relevant expert support. <b>The Panel finds the expertise engaged during supervision was not commensurate to the risks and reported allegations of involuntary resettlement and the use of excessive force until December 2023. The Panel also finds that before December 2023, Management supervision was insufficient and did not recognize that an involuntary resettlement process had been initiated. Management also did not identify or record the serious reports of excessive violence, including during cattle seizures related to restriction of access to legally designated parks and other incidents. The Panel finds this is not in compliance with Bank Policy on Investment Project Financing, paragraph 20.</b></p>	<p><b><i>Management regrets that Project preparation and supervision did not fully appreciate key risks related to resettlement, enforcement activities, and livelihood restrictions in and around RUNAPA, and hence those risks were not sufficiently assessed or addressed during the course of Project implementation.</i></b> Notably, regarding the tensions between local communities and TANAPA officers, Management initially did not identify a connection between the Project activities and the incidents of conflict and confrontation, as similar incidents had also occurred before the Project began and in other parts of the country. Consequently, during implementation, there was insufficient attention paid to these incidents and no follow-up to identify and address their root causes within the context of the Project. Proper identification and follow-up would also have required including staff with relevant conflict-management expertise in the supervision missions.</p> <p>Nonetheless, upon the suspension of the credit and during the April-May 2024 mission, the Bank worked with the Government to set up a system for it to promptly report to the Bank all violent incidents associated with the Project, that involved TANAPA rangers and/or occurred inside the parks supported by the Project. In addition, the Bank requested the Government to report on cattle seizures as part of regular Project progress reporting, and to report immediately on any seizure that involved a violent altercation. The Government updated the PIM to include this expanded incident reporting protocol. The incident reporting protocol and templates agreed upon during the April-May 2024 Mission were immediately implemented by the Government, which they used to report any such events to the Bank up to the Project closing date.</p> <p>The Bank identified a total of 33 incidents that were reported by the Government, confidential sources, the Requesters’ representative, or the media, and sought additional information/clarification from TANAPA. In</p>

No.	Finding	Response
		<p>some cases, the details remain contested and it was not possible to reconcile different accounts. In others, the Government has assured the Bank that it has taken measures to address any issues and prevent recurrence, although the Bank has not been given any details of those measures.</p> <p>The Bank also created a context-specific news feed on TANAPA, with the intention of keeping the Bank informed of any violent incidents and resettlement activities in the four parks. Additionally, the Bank hired a firm to systematically monitor and collect media reports on these topics from both mainstream and social media. These efforts enabled the Bank to verify and/or supplement the list of incidents captured by the Government’s monitoring systems (i.e., TANAPA’s occurrence book) and reported to the Bank. All incidents that have come to the Bank’s attention have been logged and discussed with the Government.</p> <p><i>Management notes the Panel’s finding that the frequency of Project supervision missions was adequate.</i><sup>5</sup> Nonetheless, Management highlights that after the suspension of disbursements, in April 2024, the Bank significantly bolstered its supervision and attention to this Project, including through five additional technical missions. These included two missions to the five villages in RUNAPA, two missions to strengthen the GRM, and one mission to the three other national parks. The Bank team also held several technical discussions with the Government. The Bank’s supervision at the time was supported by a firm specializing in security and conflict in the context of protected area management.</p>
8.	<p><b><i>Bank’s Exercise of Remedy in Relation to Borrower’s Contractual Obligations</i></b></p> <p>The Panel observes that, following the March 2024 supervision mission, Management suspended the Project on April 18, 2024. <b>The Panel finds Management in compliance with the Bank’s policy on Investment Project Financing, paragraph 27 (December 2021), for having exercised the Bank’s legal remedy by</b></p>	<p><b><i>Management notes the Panel’s finding of compliance.</i></b></p> <p>The Borrower requested the cancellation of any outstanding undisbursed amounts affected by the Bank’s suspension and the advancement of the credit closing date, thus terminating the Project implementation period on November 6, 2024.</p>

<sup>5</sup> Inspection Panel Investigation Report, paragraph 198.

No.	Finding	Response
	<p><b>suspending disbursements of unwithdrawn amounts of the Bank Loan.</b> The Panel observes that while the intent of the suspension of disbursement is to bring the Project back into compliance with Bank policies, the Panel notes that the measures suggested to lift the suspension may not fully address the shortcomings of this Project identified by this investigation.</p>	

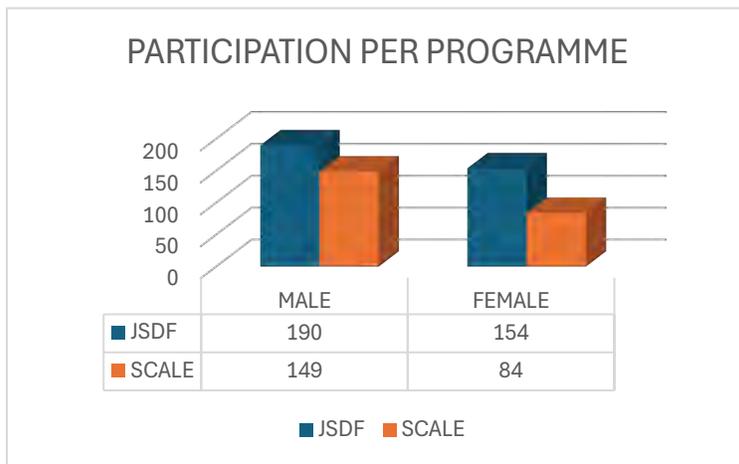
## ANNEX 2

### SUMMARY OF STAKEHOLDER CONSULTATIONS FOR THE PROJECT SUPPORTED THROUGH TRUST FUND AND THE SCALING-UP LOCALLY LED CLIMATE ACTION PROGRAM (SCALE)

#### OVERVIEW

This report presents the outcomes of two consultations conducted by the World Bank mission under a Trust Fund and the Scaling-up Locally Led Climate Action Program (SCALE). These consultations aimed to gather diverse stakeholder perspectives on climate challenges, collaboratively develop regionally tailored solutions, and align recommendations with national strategies, including Tanzania's National Climate Change Response Strategy (NCCRS). Communities consulted demonstrated strong interest and support for the proposed projects.

The initiatives will support the United Republic of Tanzania's climate adaptation and mitigation strategies through a locally led climate action model that addresses the diverse and immediate impacts that communities experience because of climate change. These respond to the Government's request for national climate programs/projects that holistically support its national development goals and international commitments.



The consultation mission engaged approximately 533 participants from diverse backgrounds, with a gender composition of 42 percent women and 58 percent men. Attendees included representatives from the Government (Mainland and Zanzibar), non-governmental organizations (NGOs), faith-based organizations (FBOs), pastoralist and farming communities, women-led

groups, youth organizations, conservationists, human rights and governance advocates, and People Living with Disabilities (PLWD). Under the Trust Fund, a baraza (large open community meeting) was held in Luhanga village with local leaders led by the Ward councilor (representing communities from the 5 villages inside RUNAPA), where many community members from villages in RUNAPA unanimously expressed support for the Trust Fund project. The communities consulted for both projects urged the Government and World Bank to expedite the processing of the operations to extend the much-needed support to these local communities.

To ensure inclusivity and depth, the consultations employed comprehensive and multi-faceted methodologies. Central to the process were interactive sessions such as presentations by the World Bank and the Government of Tanzania, desk reviews, field visits, open discussions, Q&A sessions, and FGDs. To further enhance the process, evaluation forms were distributed during CSO consultations to systematically capture feedback and participant insights. The data collected was analyzed to generate descriptive statistics, uncover trends, and ensure the findings were evidence-

based. This approach ensured the outcomes were reflective of stakeholder experiences and aligned with the realities of climate challenges and opportunities in Tanzania.

Given the importance of identifying and managing environmental and social risks associated with Bank funded projects, Environmental and Social System Assessment (ESSA) was conducted to ensure the SCALE Program is developed in ways that are sustainable and inclusive. A validation mission was conducted from February 17 to 22, 2025. The mission engaged 150 stakeholders—including representatives from the President's Office – Regional Administration and Local Government (PO-RALG), the Vice President's Office, environmental officers, community development officers, climate change coordinators, and NGOs specializing in climate change issues—to present the ESSA findings and gather feedback prior to final disclosure, focusing on key program areas. Stakeholders validated and commended the findings, affirming that critical safeguarding issues were sufficiently addressed, while offering recommendations for further refinement. These included strengthening existing grievance redress mechanisms (GRMs) by implementing localized systems involving Civil Society Organizations (CSOs) and Local Government Authorities (LGAs) to enhance social accountability, transparency, and dispute resolution; bolstering the capacity of Environmental, Social, Health, and Safety (ESHS) units within LGAs for effective risk management at the local level; improving communication by promoting clear, community-friendly, non-technical language to enhance public understanding and participation; ensuring policy alignment by integrating the SCALE program with Tanzania's five-year local government strategic plans to foster coherence and avoid duplication; and incorporating indigenous climate adaptation practices and local governance structures into program design to enhance sustainability and cultural relevance.

The consultations underscored the diverse climate challenges across Tanzania and highlighted the following priorities, which require context specific solutions. Further and continuous dialogue with communities will be key in designing and implementing these initiatives.

## REGIONS CONSULTED AND KEY ISSUES IDENTIFIED

Region	Key Climate Challenges	Unique Local Context
<b>Lindi</b>	Coastal erosion, flooding, and soil degradation.	Coastal zones experiencing tidal surges and sea-level rise, affecting livelihoods.
<b>Mwanza</b>	Rising water levels in Lake Victoria, increased siltation, and loss of fish breeding grounds.	Critical to fisheries and tourism, with biodiversity threatened by unsustainable practices.
<b>Mbeya and Mbarali</b>	Landslides, soil erosion, overgrazing and declining river water flows.	Highland areas impacted by deforestation and unsustainable agricultural expansion, unsustainable livestock farming. Conservation versus farming land.
<b>Zanzibar (Pemba and Unguja)</b>	Coastal erosion, saltwater intrusion, and infrastructure damage.	Island communities highly dependent on marine resources for livelihoods and economy.
<b>Manyara</b>	Prolonged droughts affecting agriculture and water availability.	Semi-arid region with reliance on rain-fed agriculture and pastoralism.
<b>Dodoma</b>	Deforestation, water scarcity, and land degradation.	Central region suffering from tree cutting for fuelwood and degraded grazing lands.
<b>Mara and Shinyanga</b>	Drought, water shortages, and conflicts over land use.	Predominantly agricultural and pastoralist communities facing land-use disputes.
<b>Geita and Kagera</b>	Deforestation, biodiversity loss, and declining fish stocks.	Lake zone areas crucial for fisheries and natural resources, impacted by overexploitation.

<b>Simiyu</b>	Food insecurity, loss of grazing areas, and deforestation.	Affected by climate-induced land degradation, with limited adaptive capacity.
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#### MAIN STAKEHOLDER CONTRIBUTIONS

Stakeholder Group	Key Issues Raised
<b>Local Government Authorities (LGAs)</b>	Advocated for integrating climate priorities into local policies and addressing land-use conflicts.
<b>Communities</b>	Stressed equitable access to water resources, improved farming techniques, and livelihood diversification.
<b>CSOs and NGOs</b>	Focused on capacity-building for women and youth, monitoring resource management, and inclusion in Program implementation.

#### KEY RECOMMENDATIONS

Recommendation	Objective	Expected Outcome
<b>Establish Grievance Mechanisms</b>	Enhance transparency, accountability, and community trust in climate action initiatives.	Improved stakeholder confidence and participation in decision-making processes.
<b>Promote Capacity-Building Initiatives</b>	Equip women and youth with skills in climate-smart agriculture, entrepreneurship and leadership.	Strengthened local capacity to implement and sustain climate-resilient practices
<b>Introduce Innovative Funding Models</b>	Implement performance-based financing and other mechanisms to optimize resource use.	Increased efficiency and accountability in climate project implementation and funding utilization.
<b>Develop Comprehensive Land-Use Plans</b>	Minimize land-use conflicts and allocate resources more effectively.	Enhanced sustainability through coordinated land management and reduced disputes.
<b>Encourage Livelihood Diversification</b>	Expand opportunities in eco-tourism, renewable energy, and other sustainable industries.	Reduced reliance on vulnerable sectors and strengthened community resilience to climate impacts.

#### Next Steps and Action Plan

To build on the consultation outcomes, the following steps have been proposed:

1. Prepare a Stakeholder Engagement Plan reflecting consultation findings in priority hotspots.
2. Conduct trainings for LGAs, CSOs, and community leaders on climate resilience and resource management.
3. Integrate climate discussions into village meetings to sustain momentum.

4. Leverage digital tools for real-time tracking of project outcomes and stakeholder feedback.

Conclusively, the insights and recommendations outlined in this report form a foundation for action, ensuring that future interventions are inclusive, context-specific, and sustainable. Continued collaboration among stakeholders will be critical in translating these outcomes into impactful climate resilience initiatives across Tanzania. Consultations with communities under the projects will be a continued process guided by the stakeholder engagement plans.