

**Victoria Kwakwa**  
Vice President  
Eastern and Southern Africa Region

December 17, 2024

Federica Donati  
Officer-in-charge  
Special Procedures Branch  
OHCHR

Dear Special Rapporteurs and Chair-Rapporteurs:

Thank you for your letter dated October 18, 2024, regarding the World Bank–financed project in Tanzania titled Resilient Natural Resource Management for Tourism and Growth Project (REGROW, or the Project). I am responding on behalf of President Ajay Banga.

Your letter focuses on information you have received regarding REGROW. In particular, your letter states that you have received allegations of, among other concerns, excessive use of force by park rangers, threats of forced eviction, and serious harm to indigenous peoples and other individuals near the Ruaha National Park (RUNAPA) in Tanzania. Among other elements, your letter also requests the World Bank for additional information about these allegations, the measures taken or planned by the World Bank to address these allegations, and the results of Bank’s investigation into these matters. Since these issues and concerns are closely related, we are responding to them in an integrated manner in this letter.

At the outset, we wish to underscore that the World Bank takes very seriously allegations of harm or the potential for harm in the projects it finances. The grave allegations relayed in your letter were already known to the Bank as raised by complainants (known as Requesters) and a civil society organization under the Project as part of the World Bank Inspection Panel (the Panel) process. The Bank remains deeply concerned about the serious nature of the reports and the well-being of the affected communities. The Bank is committed to doing everything possible, working with the Government of Tanzania, to understand and address these incidents. An ongoing dialogue is underway with the Government and the Requesters to address these issues.

Your letter states that any World Bank response will be publicly disclosed on the Special Procedures’ website within 60 days, i.e. by December 17, 2024, alongside your own communication on this matter. Accordingly, we write today with a preliminary but limited response. Because these allegations are subject to an ongoing Inspection Panel proceeding,

we are currently limited in our ability to answer your questions. We also appreciate that your letter does not “wish to prejudge the accuracy” of the allegations you relay. As you may know, the Inspection Panel is part of the World Bank’s Accountability Mechanism. It is authorized by the Executive Directors of the World Bank (the Board) to carry out independent investigations into Bank-financed projects to assess the extent of the Bank’s compliance with the Bank operational policies and procedures. Once the Board authorizes the Inspection Panel to conduct an investigation and the Panel shares its investigation report with the Board, the Bank has an opportunity to share a response to this report with the Board. This response includes the Bank’s proposed actions to address the Panel’s findings of non-compliance. It also reflects consultations with the Requesters. The Board then considers the Panel’s report and the Bank’s response, including the proposed Management Action Plan designed to respond to the findings of the investigation. These findings, responses, and deliberations are confidential until the Board has an opportunity to consider them. After that, all these documents become public. This process is governed by Resolutions adopted by the Board.<sup>1</sup>

This Panel process is currently underway for REGROW. The Panel has completed its investigation, and the World Bank is reviewing and preparing a response to the Panel’s findings. We are also working closely with the Government of Tanzania, which has committed to addressing these findings as outlined in a Management Action Plan currently under preparation. This plan will be informed by consultations with the Requesters and affected communities before it is submitted to the Board for consideration. We will send you a copy of the Inspection Panel investigation report, the Bank’s response, and the action plan approved by the Board once they become public in the coming months.

In the meantime, based on publicly available information and without prejudging the outcome of the Panel process, we can offer the following information and updates:

- **Overview of the REGROW Project:** The REGROW Project was approved by the Board of the Bank 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). 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. 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.

---

<sup>1</sup> Resolution No. IBRD 2020-0004 and Resolution No. IDA 2020-0003 (Sept. 8, 2020); Resolution No. IBRD 2020-0005 Resolution No. IDA 2020-0004 (Sept. 8, 2020). Both Resolutions are available at the following link: <https://accountability.worldbank.org/en/key-documents>.

- **Status of the Project:** On April 17, 2024, the Bank suspended disbursements under the Project's Financing Agreement given that the Government initiated preparatory activities for resettlement without following the requirements of the Project's Resettlement Policy Framework (RPF). The suspension letter highlighted shortcomings in the establishment of an adequate grievance redress mechanism (GRM). In addition, the Bank noted the need for a system to report on previous and future violent incidents in the Project area. The Bank required all three issues to be resolved before disbursements could resume. This suspension was followed by visits by Bank staff and management to Tanzania, where the Bank team met with representatives of the Ministry of Finance, Ministry of Lands, Housing and Human Settlements Development (MLHSD), MNRT, Mbeya Region and Mbarali District, to discuss the Government's resettlement plans and incident reporting systems, among other issues. On November 6, 2024, the Government of Tanzania as the Borrower, informed the Bank of its decision to cancel the Project's undisbursed balance, while advancing the project closing date with immediate effect.
- **Role of the World Bank:** The Bank has stringent due diligence responsibilities that seek to ensure that the projects it finances are implemented in accordance with the Bank's policies. In particular, the Bank's Environmental and Social Safeguard Policies were applicable under REGROW. For more recent projects, the World Bank follows the Environmental and Social Framework, which embeds even stronger environmental and social policies in Bank-financed operations. These policies are designed to help prevent and mitigate possible adverse impacts of Bank-financed projects on people and the environment. While these policies do not expressly include a requirement to undertake human rights due diligence, they embed the key human rights principles essential to sustainable development, including those for social inclusion, non-discrimination, transparency, accountability and public participation. They also specify that Borrowers are required to ensure that project-level consultations with affected people should be free of manipulation, interference, coercion, discrimination and intimidation, including for those who would access grievance and accountability mechanisms.
- **Applicable standards:** We note your reference to the UN Guiding Principles on Business and Human Rights as well as several other international human rights norms. We would like to emphasize that these principles are directed to Member States and businesses. They do not assign obligations or responsibilities to multilateral institutions such as the World Bank, which is an international organization established by its Articles of Agreement and which, by virtue of its Relationship Agreement with the United Nations, is required to function independently. The environmental, social and other relevant policies that apply to the World Bank are designed to enable us to properly address the allegations that were raised in this context.
- **Inspection Panel findings:** The Panel's investigation report found the Bank to be in compliance with Bank policies in some respects and out of compliance in other

respects. The Panel also made some relevant observations in earlier documents that are already public. In particular, the Panel previously confirmed that the individuals living in the Project area near RUNAPA were not Indigenous Peoples as defined by the specific criteria of the applicable Bank policy (Operational Policy 4.10 – Indigenous Peoples).<sup>2</sup> For all projects it finances, the World Bank takes care to ensure that the unique cultural identities and well-being of Indigenous Peoples are not threatened, and that these communities participate in and benefit from the development process.

The Bank remains committed to addressing the concerns raised in the Request for Inspection, which are echoed in your letter, and the well-being of the affected communities through the Management Action Plan mentioned above. As indicated earlier, we will share with you all relevant documents once the Panel process concludes. We thank you for your concern and communication regarding this important matter.

Sincerely



Victoria Kwakwa  
Vice President  
Eastern and Southern Africa Region  
The World Bank

---

<sup>2</sup> The Inspection Panel Report and Recommendation on a Request for Inspection, Tanzania: Resilient Natural Resource Management for Tourism and Growth (P150523) (Sept. 19, 2023), paras. 75-78, *available at* <https://www.inspectionpanel.org/sites/default/files/cases/documents/165-Inspection%20Panel%20Report%20and%20Recommendation-19%20September%202023.pdf>.