

# 2024 **ANNUAL REPORT** THE INSPECTION PANEL



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## MESSAGE FROM THE PANEL

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Last fiscal year, 2023, marked the 30<sup>th</sup> anniversary of the 1993 creation of the Inspection Panel—the first independent accountability mechanism at an international financial institution—by the World Bank Board of Executive Directors. During Fiscal Year 2023, the Panel commemorated this important milestone in various ways with our stakeholders. In particular, we produced a video—30<sup>th</sup> Anniversary of The World Bank Inspection Panel—which features the voices of many people involved with our work over the years, including community members, World Bank Executive Directors, civil society activists, academics, and former Panel Members. The Panel believes the video describes our role, and our commitment to giving voice to those who may be adversely affected by World Bank-funded projects—thereby ensuring that the Bank follows its policies and procedures and contributing to the Bank's learning and institutional improvement.

The Panel acknowledges that how we communicate our work must continue to evolve as we fulfill our mandate. With the aim of involving a wider group of audiences in the Panel's core work, in Fiscal Year 2024 we published a non-technical summary of our Investigation Report on the Bank-financed West Africa Coastal Areas Resilience Investment Project in Togo. We complemented this with a video, in which the investigation case team describes the investigation and sets out the Panel's findings. We will continue this initiative for all future Panel investigations.



During Fiscal Year 2024, the Panel published its ninth advisory report, which covered the topic of livelihoods—an essential aspect in the survival of many project-affected persons facing involuntary resettlement. We hope this advisory report will serve as a valuable resource for advancing collective understanding and knowledge about livelihood issues in the context of involuntary resettlement and contribute to improving development practices and outcomes.

The Panel expresses its sincere thanks to the Board for its continuing strong support of our work. We welcomed the appointment by the Board of an independent External Review Team in January 2024 to undertake the review of the 2018 and 2020 Reforms to the Inspection Panel Toolkit and the Creation of the Accountability Mechanism. The Panel is grateful for the active engagement of the Executive Directors throughout the External Review process to ensure the World Bank maintains a robust accountability mechanism, and we look forward to the successful completion of the review. We are grateful for the trust that Requesters have placed in the Panel and extend our thanks to civil society and other stakeholders for their efforts and partnerships to promote accountability.

The Panel also thanks Bank Management and its staff for their constructive engagement with us. We thank the management and staff of various Country Offices for facilitating our in-country missions during Fiscal Year 2024, while appreciating our need for confidentiality and independence.

Additionally, we want to thank the staff of the Inspection Panel for their commitment and hard work.

We look forward to working with all stakeholders in the coming year, and we reconfirm our commitment to realizing the Panel's mandate by ensuring that project-affected individuals and communities are heard at the highest levels of the institution.

Finally, the Inspection Panel wishes to express its appreciation to Ramanie Kunanayagam, whose term as a Panel member ended in April 2024. Ramanie served as Panel Chairperson from 2022 to 2023. During her tenure, she led and oversaw the update of the Panel's existing Operating Procedures, engaged with the Board on the commencement of the External Review of the 2018 and 2020 Reforms to the Inspection Panel Toolkit and Creation of the World Bank Accountability Mechanism, published two advisory reports on intimidation and reprisals, and livelihoods, celebrated the Panel's 30th anniversary, and most importantly, successfully led cases and investigations. The Panel and its staff thank Ramanie for her expertise, leadership, and her unwavering commitment to strong accountability, and to upholding the Panel's integrity and independence. We send Ramanie and her family members, Scott and Louvella, best wishes for the future.

**Mark Goldsmith**, Chairperson  
**Ibrahim Pam**  
**Evelyn Dietsche**



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I.

# ABOUT THE INSPECTION PANEL





## THE INSPECTION PANEL

The Inspection Panel is an impartial, fact-finding complaints mechanism that is independent of World Bank Management and reports directly to the World Bank's Board of Executive Directors. The Board created the Panel in 1993 to offer people and communities access to an impartial body should they wish to raise concerns about—or seek recourse for harm caused by—a World Bank-funded project. The Panel's process promotes accountability at the Bank, gives affected people a greater voice in World Bank-supported activities that affect their rights and interests, and provides redress when warranted.

## STRUCTURE OF THE INSPECTION PANEL AND ITS TEAM

The Inspection Panel consists of three members appointed by the Board for five-year, non-renewable terms. Members are selected for their ability to deal thoroughly and fairly with the complaints brought to them, their integrity and independence from Bank Management, and their familiarity with developmental issues and living conditions in developing countries. The Inspection Panel is assisted by dedicated staff who provide operational and administrative support. For its fact-finding and investigations, the Panel also engages independent, internationally recognized experts to ensure objective and professional assessment of the issues under review.

In September 2020, the Board established the Accountability Mechanism (AM) and the Dispute Resolution Service (DRS). The Board also amended the Inspection Panel's Resolution to incorporate the DRS process. Inspection Panel members coordinate with the AM Secretary and DRS on casework and initiatives such as outreach and events.

## WHAT DOES THE INSPECTION PANEL DO?

The Panel is mandated to review projects funded by the World Bank through the International Bank for Reconstruction and Development (IBRD) and the International Development Association (IDA). In response to complaints from project-affected individuals or groups, the Panel assesses allegations of harm to people, communities, or the environment and reviews whether the Bank has followed its operational policies and procedures.

This assessment often involves issues such as:

- Adverse effects on people and livelihoods due to displacement and resettlement related to infrastructure projects—including the construction of hydroelectric dams, roads and pipelines, the development of mines, and the management of landfills.
- Risks to people and the environment related to dam safety, use of pesticides, and other indirect effects of investments.
- Risks to Indigenous Peoples, their culture, traditions, land tenure, and development rights.
- Adverse effects on physical cultural heritage, including sacred places.
- Harm to natural habitats, including protected areas such as wetlands, forests, and water bodies.

The Panel also provides advisory services through various reports and publications on lessons emerging from its cases. Panel staff organize and participate in outreach activities, seminars, and other events to disseminate information about the Panel, its mandate, and work.





## II. CASE SUMMARY





During Fiscal Year 2024 (July 1, 2023 to June 30, 2024), the Inspection Panel received six new Requests for Inspection:

- **Viet Nam:** [Vietnam Coastal Cities Sustainable Environment Project](#) (P156143) – Second Request
- **India:** [India Ecosystem Services Improvement Project](#) (P133803)
- **Pakistan:** [Sindh Flood Emergency Rehabilitation Project](#) (P179981)
- **Serbia:** [Public Sector Efficiency and Green Recovery DPL](#) (P164575)
- **Pakistan:** [Khyber Pass Economic Corridor Project](#) (P159577)
- **Nigeria:** [Ibadan Urban Flood Management Project](#) (P130840)

Two of these Requests were not registered [relating to the following projects (i) India: India Ecosystem Services Improvement Project, and (ii) Pakistan: Sindh Flood Emergency Rehabilitation Project]. Three were still pending the Panel's decision at the end of Fiscal Year 2024 [relating to the following projects (i) Serbia: Public Sector Efficiency and Green Recovery DPL, (ii) Pakistan: Khyber Pass Economic Corridor Project, and (iii) Nigeria: Ibadan Urban Flood Management Project]. The Panel recommended to the Board an investigation of the Viet Nam: Vietnam Coastal Cities Sustainable Environment Project – Second Request, and the Requesters and the Borrower were pursuing dispute resolution as of June 30, 2024.

During Fiscal Year 2024, the Inspection Panel continued its investigation work on three previous Requests [relating to the following projects (i) Togo: West Africa Coastal Areas Resilience Investment Project, Additional Financing, and Global Environment Facility (GEF), (ii) Bolivia: Santa Cruz Road Corridor Connector Project (San Ignacio–San José), and (iii) Tanzania: Resilient Natural Resource Management for Tourism and Growth—in May 2024, the Panel also received a second Request for Inspection, which was added to the ongoing investigation]. The Panel closed one case in which a dispute resolution agreement had been reached between the Requesters and the Borrower [this related to the Cameroon: Nachtigal Hydropower Project, and the Hydropower Development on the Sanaga River Technical Assistance Project—jointly considered as the Project].

The next section summarizes these cases. Depending on the case, the following information is provided: project information, a description of the Request for Inspection, Bank Management's response to the Request, the Panel's action in response to the Request, the Management Action Plan in response to a Panel investigation, and the Board discussion or action. More detailed information on all these cases can be found on [the Inspection Panel's website](#).

# III. CASE UPDATES



# 01.

## REGISTRATION

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During Fiscal Year 2024, the Panel received six Requests for Inspection. One Request from Viet Nam was registered and proceeded to the eligibility stage. Three Requests—originating from Serbia, Pakistan, and Nigeria—are currently under review for technical admissibility and their registrations remain pending. Two Requests—one from India and another from Pakistan—were not registered, as they did not satisfy the admissibility criteria.

### A. PENDING REGISTRATION

**SERBIA**  
**PUBLIC SECTOR EFFICIENCY AND GREEN RECOVERY DEVELOPMENT POLICY LOAN**

#### PROJECT INFORMATION

Project No.	P164575
Region	Europe and Central Asia
IBRD Loan Amount	EUR82.6 million
Board Approval Date	April 29, 2021
Closing Date	December 31, 2022

The project development objective is to support the Government of Serbia's efforts to (i) increase public-sector efficiency and transparency and (ii) initiate a green recovery.

#### THE REQUEST

On March 31, 2024, a Request for Inspection was submitted by A11 – Initiative for Economic and Social Rights (the A11 Initiative)—a nongovernmental organization in Belgrade, Serbia—representing six individuals living in Serbia, some of whom belong to the Roma community. The A11 Initiative asked Amnesty International—an international civil society organization—to serve as its advisor in the Panel process.

The Request alleged four main adverse impacts resulting from the enactment of the Law on Social Card and, consequently, the Bank's support for the establishment of the Social Card Registry. First, the Request said the Social Card Registry negatively affected approximately 44,000 beneficiaries, and the implementation of the Law on Social Card has had a disproportionately negative impact on the social protections of vulnerable citizens—including members of the Roma community—and on their access to financial social benefits. Second, the Request claimed that the Law on Social Card was enacted without prior public consultation, and that the algorithm used to determine



whether beneficiaries meet the criteria for financial social assistance was not publicly available, despite repeated requests to the Government for information. Third, the Request alleged those adversely affected were unable to seek remedy through appropriate administrative means. Fourth, the Request contended the Law on Social Card does not align with a human rights-based approach to data management due to the undisclosed algorithm, the centralization of data in a single register, noncompliance with the data minimization principle, and the lack of adequate oversight of a semi-automated decision-making system. The Request alleged the Registry exacerbates existing flaws in a system that discriminates against the Roma people.

## PANEL DECISION

As of June 30, 2024, the Panel was reviewing the Request for Inspection in accordance with its mandate and operating procedures.

### PAKISTAN KHYBER PASS ECONOMIC CORRIDOR PROJECT

## PROJECT INFORMATION

<b>Project No.</b>	<b>P159577</b>
<b>Region</b>	South Asia
<b>IDA Credit Amount</b>	US\$460.6 million
<b>Board Approval Date</b>	June 14, 2018
<b>Closing Date</b>	May 28, 2026

The project development objective is to expand economic activity between Pakistan and Afghanistan by improving regional connectivity and promoting private-sector development along the Khyber Pass corridor.

## THE REQUEST

On June 1, 2024, the Panel received a Request for Inspection signed by 448 individuals living in the area under consideration for the Project in Khyber Pakhtunkhwa Province, Pakistan.

The Request raised five main concerns specific to the design and route alignment of the Southern Link Road (SLR)—a new, four-lane road to be constructed as part of the Project. First, Requesters raised concerns about the impact of land take required for the road, which Requesters claimed would cause substantial displacement and loss of livelihood of project-affected people and, based on previous experience with a non-Bank funded project in the area, that compensation would be inadequate, and payments would be delayed. Second, there were concerns that the Project-supported road would heighten tensions and conflicts in the Project area, resulting in increased violence. Third, the Request alleged that the SLR's design—particularly its elevation—would impact traditional cultural practices in homes adjacent to the road, and that the road alignment would damage physical cultural resources. Fourth, the Request claimed community members and elected local authorities were neither informed nor meaningfully consulted about

the SLR, including the road’s proposed alignment, its viability, and its economic benefits. Fifth, the Requesters raised concerns about environmental and noise pollution worsening as a result of the SLR, and they claimed the publicly disclosed Project documents lack feasible solutions to these concerns.

PANEL DECISION

As of June 30, 2024, the Panel was reviewing the Request for Inspection in accordance with its mandate and operating procedures.

NIGERIA  
IBADAN URBAN FLOOD MANAGEMENT PROJECT

PROJECT INFORMATION

Project No.	P130840
Region	Western and Central Africa
IDA Credit Amount	US\$200 million
Board Approval Date	June 17, 2014
Closing Date	June 28, 2024

The project development objective is to improve the capacity of Oyo State to effectively manage flood risk in the city of Ibadan.

THE REQUEST

The Request for Inspection was submitted on June 25, 2024, by three residents of Odija, Ibadan North, Oyo, Nigeria.

The Requesters alleged that the Project has not complied with the World Bank’s operational policies and procedures, thereby causing significant harm to their community. The Requesters claimed Project-related construction activities blocked a nearby water channel, subsequently flooding and damaging the Requesters’ houses and property—including shops, stores, food, and clothes. The Request alleged that, since the flood, the Requesters have experienced disruptions to their livelihoods and businesses, resulting in loss of their customers. The Requesters added that they face daily challenges from the flood damage to their home appliances. They stated that the compensation offered to them was significantly less than their losses.

## PANEL DECISION

As of June 30, 2024, the Panel was reviewing the Request for Inspection in accordance with its mandate and operating procedures.

## B. NOT REGISTERED

PROJECT	REASON FOR NOT REGISTERING THE REQUEST
1. <b>India:</b> India Ecosystem Services Improvement Project	The Project was closed at the time the Request was received. According to the Panel's Resolution, the Panel shall not hear Requests filed after a project's closing date for projects approved before September 8, 2020.
2. <b>Pakistan:</b> Sindh Flood Emergency Rehabilitation Project	The Panel determined that there is no plausible link between the alleged harm raised in the Request and the Bank-financed Project because the Requesters did not own the land allegedly affected by the Project.





## 02. ELIGIBILITY

During Fiscal Year 2024, the Panel assessed the eligibility of three Requests for Investigation: one relating to a project in Viet Nam and two relating to a single project in Tanzania. The Request from Viet Nam is currently in dispute resolution, while the two Requests from Tanzania advanced to investigation. In addition, one Request relating to a project in Cameroon that the Panel had previously recommended for investigation has completed the dispute resolution process and the Panel issued a memorandum on closing the case, as is reported below.

### A. INVESTIGATION RECOMMENDED – ONGOING INVESTIGATION

TANZANIA

RESILIENT NATURAL RESOURCE MANAGEMENT FOR TOURISM AND GROWTH (REGROW)

#### PROJECT INFORMATION

Project No.	P150523
Region	Eastern and Southern Africa
IDA Credit Amount	US\$150 million
Board Approval Date	September 27, 2017
Closing Date	February 28, 2025
Board Approval Date	September 27, 2017

The project development objective is 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.

#### FIRST REQUEST

On June 20, 2023, a First Request for Inspection was submitted by two individuals from Tanzania. The Request stated that the Project provided direct, material, policy, and institutional support to Tanzania National Parks (TANAPA) for the management of Ruaha National Park (RUNAPA), including equipment used for patrols. The Request alleged that TANAPA rangers practiced “extreme cruelty” while conducting cattle seizures and engaged in “extrajudicial killings” and the “disappearance” of community members. The Requesters claimed that over the past two years large numbers of their cattle had been seized to the detriment of pastoral livelihoods. They also alleged said seizure of

cattle has harmed several Indigenous Peoples groups, including Maasai, Sukuma, and Datoga pastoralists, who inhabit the Project area. According to the Request, communities residing in five villages located inside the boundaries of RUNAPA—more than 21,000 people—are under threat of eviction.

## MANAGEMENT RESPONSE

In its First Response on August 18, 2023, Management stated that the serious allegations regarding conflicts between pastoralist communities and the Government's conservation efforts predated the Project and were unrelated to it. According to Management, its initial review found no connection between the alleged abuses and the Project, or that they resulted from noncompliance with Bank policy. Management said the Bank nevertheless raised its concerns with the Government and requested that the alleged incidents be examined and addressed by the competent national authorities.

## PANEL RECOMMENDATION ON THE FIRST REQUEST / BOARD APPROVAL / REFERRAL TO DISPUTE RESOLUTION

The Panel submitted its Report and Recommendation to the Board on September 19, 2023. It recommended investigating the Bank's review and due diligence of the capacity and processes of TANAPA, and whether risks to communities were identified in Project documents and appropriate mitigation measures put in place. The Panel determined that no resettlement was taking place in the Project area, and it was not possible to establish a plausible link between the alleged or potential harm resulting from resettlement and the Project. The Panel noted, however, that if resettlement was subsequently triggered in the Project area within the life of the Project, the Requesters retained their right to submit a new Request for Inspection if they believed they were experiencing or will likely experience harm due to noncompliance with Bank policies.

On November 15, 2023, the Board approved the Panel's Recommendation to investigate the Project. As per the Inspection Panel and Accountability Mechanism Resolutions, following the Board's approval of the Panel's recommendation, the Accountability Mechanism Secretary (AM Secretary), as Head of the Dispute Resolution Service (DRS), offered the Requesters and Borrower (the Parties) the opportunity to pursue a dispute resolution process facilitated by the DRS. On December 11, 2023, the AM Secretary informed the Board, the Panel, and Bank Management that there was no agreement from both Parties to enter dispute resolution. Thereafter, the Panel posted its Investigation Plan on its website on December 14, 2023, and initiated the investigation.

## SECOND REQUEST

During the course of investigation, the Panel received a Second Request for Inspection on May 3, 2024. That Request stated that a new Government Notice (GN) GN-754 issued on October 20, 2023, modified the boundary of RUNAPA to include at least "23 legally registered villages" within RUNAPA, portending imminent harm to these communities in addition to the ongoing impact from escalating seizures of cattle and farm equipment. The Request reiterated that GN-754 could trigger the eviction of communities living around the park boundaries.

**PANEL RECOMMENDATION ON THE SECOND REQUEST / BOARD APPROVAL / REFERRAL TO DISPUTE RESOLUTION**

On May 17, 2024, the Panel recommended to the Board that the ongoing investigation include the allegations raised in the Second Request. The Panel considered GN-754 and the changed park boundary a new circumstance that suggested a plausible link between the Project and the alleged harm. On May 24, 2024, the Board approved the Panel's recommendation.

As per the Inspection Panel and Accountability Mechanism Resolutions, following the Panel's Recommendation, the AM Secretary, as Head of the DRS, offered the Parties the opportunity to pursue a dispute resolution process facilitated by the DRS. On May 31, 2024, the AM Secretary informed the Board, the Panel, and Bank Management that the Parties did not agree to dispute resolution. The Panel therefore disclosed its updated Investigation Plan on May 31, 2024, and continued its investigation with the added allegations. Details of the ongoing investigation are discussed in Section 03. Investigation.

**B. INVESTIGATION RECOMMENDED - CURRENTLY UNDER DISPUTE RESOLUTION**

VIET NAM

VIETNAM COASTAL CITIES SUSTAINABLE ENVIRONMENT PROJECT – SECOND REQUEST

**PROJECT INFORMATION**

Project No.	P156143
Region	East Asia and the Pacific
IBRD Loan & IDA Credit Amounts	IBRD Loan Amount: US\$34.2 million IDA Credit Amount: US\$156.4 million
Board Approval Date	May 5, 2017
Closing Date	June 30, 2024

The project development objective is to increase access to sanitation services and improve the operational performance of sanitation utilities in the Project cities.

**THE REQUEST**

On August 27, 2023, a Request for Inspection was submitted by 31 individuals from the Project area of Nha Trang City, Khanh Hoa Province, Viet Nam. The Panel issued a Notice of Receipt on September 8, 2023, and registered the Request on September 25, 2023.

In November 2023, a Panel team visited Viet Nam to inform its Report and Recommendation to the Board as to whether an investigation was warranted. During its visit, the team met with the Requesters and other project-affected community members who raised additional grievances and asked that these be included in the Request. The Panel shared these grievances with Management, which agreed to respond to the additional grievances.



The Request raised the following interrelated allegations concerning the resettlement process. It said the restrictions placed on the properties of affected households in the Ngoc Hiep Resettlement Site (NHRS) since 2016 effectively kept owners from applying for new land certificates or repairing or renting their structures. The Request claimed inconsistent application of resettlement policies and that related consultations resulted in unfair treatment of some affected households by the Project. The Request also alleged that the inadequacy of the valuation methodology used for Project-related resettlement resulted in unfairly low compensation packages for the affected households. The Request claimed there was intimidation during the resettlement process, and that households were excluded from the resettlement process for having complained about aspects of the Project.



## MANAGEMENT RESPONSE

Bank Management provided its Responses to the allegations made in the Request and the additional issues raised on November 8 and December 20, 2023, respectively.

Management stated that it had complied with Bank policies and procedures applicable to the matters raised in the Request and that the Requesters' rights or interests have not been, nor will they be, directly and adversely affected by a failure of the Bank.

Management stated that the Project was restructured in December 2022, and that the scale of investments was reduced by discontinuing the involuntary acquisition of a five-hectare area that had originally been intended to be part of the Project. Management said that the restructuring now leaves the households located in those five hectares outside the scope of the Project and, therefore, Bank safeguard policies do not apply to them. Management maintained that the Project had not introduced any changes to land use rights and had not supported land use-related restrictions. It added that the Government's Master Plan introduced restrictions and the Requesters' grievances "can only be addressed by the relevant government agencies."

Management stated that much of the concern over insufficient compensation for land was because complainants were unable to realize anticipated gains from the speculation that has followed conversion of their agricultural land to residential land, which has a significantly higher value. Management added that the claim that compensation was insufficient to buy replacement land was incorrect since the land acquired was agricultural, and that, therefore, the correct replacement land would also be agricultural.

Management stated that police presence, alleged in the Request to be used for “intimidation,” is required by law in the case of compulsory land acquisition and when compensation payments are made in cash.

### **PANEL RECOMMENDATION / BOARD APPROVAL / REFERRAL TO DISPUTE RESOLUTION**

On January 22, 2024, the Panel issued its Report and Recommendation, which noted that in 2005 a Provincial Master Plan designated a 35-hectare area for urban redevelopment. The Panel also noted that a 2016 update of this Master Plan was contemporaneous with the development of the Project Resettlement Action Plan (RAP) and the resettlement in the NHRS required for the Project, and that land transactions continued until 2016 when restrictions in the NHRS were applied. Members of project-affected households (PAHs) informed the Panel that the restrictions placed on the properties have allegedly caused serious harm to community members.

The Panel recognized the concerns raised by some PAHs whose land was acquired that they were excluded from the land-for-land entitlement described in the 2016 RAP. The Panel noted the Requesters’ allegation that the valuation process that resulted in compensation amounts did not afford them the ability to replace their lost land or restore their livelihoods.

The Panel also noted the Requesters’ claim that they did not receive a clear explanation of the resettlement processes associated with the Project and how their plots would be affected.

In its report, the Panel concluded that the Requesters and the Request for Inspection met the technical eligibility criteria set out in the Panel Resolution. The Panel considered that the Request raises several allegations of harm that, taken together, constitute a serious allegation of harm and possible noncompliance with Bank policy. Therefore, the Panel recommended an investigation. On February 5, 2024, the Board approved this Recommendation.

As per the Inspection Panel and Accountability Mechanism Resolutions, following the Board’s approval of the Panel’s recommendation, the Accountability Mechanism Secretary (AM Secretary), as Head of the Dispute Resolution Service (DRS), offered the Requesters and Borrower (the Parties) the opportunity to pursue a dispute resolution process facilitated by the DRS.

### **DISPUTE RESOLUTION PROCESS**

On March 12, 2024, the AM Secretary reported to the Board, the Inspection Panel, and Bank Management that the Parties had voluntarily agreed to engage in the dispute resolution process.

The Panel, therefore, held its investigation in abeyance until the conclusion of the dispute resolution process in accordance with the Inspection Panel and Accountability Mechanism Resolutions. The dispute resolution process was ongoing as of June 30, 2024.

## C. DISPUTE RESOLUTION COMPLETED

### CAMEROON NACHTIGAL HYDROPOWER PROJECT

#### PROJECT INFORMATION

<b>Project No.</b>	<b>P157734</b>
<b>Region</b>	Western and Central Africa
<b>IBRD Guarantee Amount</b>	US\$300 million
<b>Board Approval Date</b>	July 19, 2018
<b>Closing Date</b>	June 30, 2025

The project development objective is to increase the availability of renewable energy power and leverage private finance for the Nachtigal Hydropower Project.

### CAMEROON HYDROPOWER DEVELOPMENT ON THE SANAGA RIVER TECHNICAL ASSISTANCE PROJECT

#### PROJECT INFORMATION

<b>Project No.</b>	<b>P157733</b>
<b>Region</b>	Western and Central Africa
<b>IDA Credit Amount</b>	US\$26.3 million
<b>Board Approval Date</b>	May 11, 2017
<b>Closing Date</b>	January 31, 2025

The project development objective is to improve the recipient's institutional capacity for sustainable development of hydroelectric resources on the Sanaga River Basin.

#### THE REQUEST

The Request for Inspection was submitted on June 30, 2022, by two community members living in the area of the two Projects in Cameroon. On July 18, 2022, an additional 99 Requesters from communities and socio-professional organizations in the area of the Projects authorized IFI Synergy—a coalition of local civil society organizations, including Green Development Advocates, which serves as their secretariat—to represent them. The Requesters asked the Panel to keep their identities confidential. Both ENDS, a Dutch nongovernmental organization, supported the Request.

The Requesters alleged they had suffered or were likely to suffer harm from two Projects supported by the World Bank, the Nachtigal Hydropower Project and the Hydropower Development on the Sanaga River Technical Assistance Project. They claimed that since the start of Nachtigal Dam construction, local communities and socio-professional organizations have suffered adverse environmental and social impacts. According to the Requesters, these resulted from: a lack of meaningful consultation; inadequate resettlement measures relating to both physical and economic displacement; loss of income-generating activities for fisherfolk, sand-miners, and fishmongers; untimely and inadequate compensation for land and crops; reduced accessibility to agricultural land; inadequate housing; destruction of sacred sites; loss of medicinal plants and water resources used for healing and rituals; and environmental damage. They also alleged that Project activities were increasing social harm to their community—including theft, juvenile delinquency, commercial sex work, marital conflicts, and divorces. The Panel registered the Request on July 25, 2022.

## MANAGEMENT RESPONSE

In its August 2022 Response, Management explained that it was aware of the Requesters' allegations and that the Projects' Implementing Agency, the Nachtigal Hydropower Company (NHPC), was addressing them. Management noted that the risks and impacts described in the Request were not uncommon for a project of this scale, that it had anticipated them, and had prepared several environmental assessment instruments to address them. To respond to additional environmental and social issues identified during supervision, NHPC had committed to a binding Supplementary Corrective Action Plan with time-bound actions. The Projects used an adaptive management approach based on comprehensive monitoring and corrective actions. Management acknowledged there were some delays in the mitigation and compensation measures, but claimed they were being implemented with comprehensive stakeholder input and supervision by the Projects' financing agencies. Management noted that the Projects' progress had been affected by the need for additional consultations, the longer-than-anticipated development of Individual Livelihood Restoration Plans (ILRPs), and work delays due to COVID-19-imposed restrictions and a shortage of high-quality cement. Management also noted that the Sanaga River Technical Assistance Project contained no physical investments other than some meteorological equipment and was only financing studies and panels of experts.

## PANEL RECOMMENDATION / BOARD APPROVAL / REFERRAL TO DISPUTE RESOLUTION

A Panel team visited Cameroon August 26–September 7, 2022, to inform its eligibility assessment. In its Report and Recommendation to the Board, the Panel noted the strong support for the Projects from all stakeholders, including the Requesters, and their unanimous view of the Projects' benefits for the community at large. The Panel recognized the steps Management was taking to address some of the alleged harm, and that the Lenders had hired an independent environmental and social consultant to advise NHPC on actions to implement. The Panel noted that the Lenders had asked for a separate consultancy tasked with undertaking the annual evaluation of the Livelihood Restoration Plan to increase their sample to include all categories of project-affected persons (PAPs). The Panel understood that several fisheries studies and a strategic environmental and social assessment for the Sanaga River basin were underway to understand basin-wide, cumulative impact.

The Panel noted that, despite the extensive measures undertaken by the Projects, allegations of harm relating to loss of livelihood activities, compensation, and livelihood restoration were consistently



raised by significant numbers of fisherfolk and sand-miners in several villages. The Panel noted the widespread concerns of downstream sand-miners and fisherfolk who claimed to have lost their livelihoods due to the diminishing resources in the river. The Panel also noted the policy requirement to compensate PAPs prior to the onset of a project's impact, but could not determine whether the compensation provided had, in fact, been timely. While the Panel understood that the Projects viewed the compensation package as including both transitional support and capital for livelihood investment, it was unclear to the Panel and the PAPs what portion of that compensation was intended to support households transitioning to new activities and what portion served as investment capital for new, income-generating activities. The Panel noted that almost everyone encountered who had implemented ILRPs claimed their Projects had failed. The Panel also noted that several PAPs said they had no, or limited, contact with the nongovernmental organization engaged to help develop and implement the ILRPs. The Panel was not assured whether the nongovernmental organization had sufficient capacity to provide the required level of technical support to all those needing it. Many fisherfolk and sand-miners contended that the measures put in place by the Projects were inadequate to achieve livelihood restoration.

On September 27, 2022, the Panel recommended an investigation into the alleged harm and potential noncompliance with World Bank operational policies and performance standards, as per Performance Standards for Private Sector Activities (OP/BP 4.03). The Board approved the Panel's Recommendation to investigate on October 19, 2022.

As per the Inspection Panel and Accountability Mechanism Resolutions, following the Board's approval of the Panel's recommendation, the Accountability Mechanism Secretary (AM Secretary), as Head of the Dispute Resolution Service (DRS), offered the Requesters and Borrower (the Parties) the opportunity to pursue a dispute resolution process facilitated by the DRS.

## DISPUTE RESOLUTION PROCESS

On December 1, 2022, the AM Secretary reported to the Board, the Inspection Panel, and Management that the Parties had voluntarily agreed to engage in dispute resolution. On November 30, 2023, the AM Secretary informed the Executive Directors, the Inspection Panel, and Management that with the agreement of both Parties, the AM Secretary had extended the dispute resolution process for an additional period of up to six months, with a final deadline on May 31, 2024.

On May 31, 2024, the AM Secretary issued a Notice of Dispute Resolution Agreement stating that the dispute resolution process had concluded on May 30, 2024, with a signed Dispute Resolution Agreement. According to the notice, the signatories have stated that the agreement is reached in full and final settlement of their dispute.

The Notice of Dispute Resolution Agreement annexed an Outcome Report, which stated that the Parties exercised the option to keep their agreement confidential, and that the AM will therefore treat it as such, and it shall not be published. The Outcome Report explained that the Requesters chose a 10-person group of representatives with five alternates who represented the complainant communities and the socio-professional groups, taking into account age and gender diversity. It stated that the group of 10 representatives signed the agreement. The Outcome Report described the final agreement as including provisions related to: livelihood restoration and supplementary support for fisherfolk, fishmongers, and sand-miners; collective, community livelihood restoration benefits; promotion of cultural heritage; measures related to support for students, training, and employment; opportunities for local service providers; and health and environmental projects.



### PANEL CLOSING MEMORANDUM

Following the voluntary agreement between the Parties to pursue dispute resolution, the Panel held its compliance investigation process in abeyance until the conclusion of the dispute resolution process, in accordance with the Inspection Panel and Accountability Mechanism Resolutions.

As per the Inspection Panel Resolution, which states that the case shall be considered closed if the AM Secretary informs the Executive Directors that the Parties have reached agreement and signed a Dispute Resolution Agreement, the Panel issued a memorandum on June 7, 2024, closing the case.

## 03.

# INVESTIGATION

During Fiscal Year 2024, the Panel completed the investigation of a Request for Inspection relating to a project in Bolivia and commenced the investigation of the two Requests relating to a single project in Tanzania. Furthermore, the Board of Executive Directors met to discuss the Panel's earlier investigation of a Request concerning a project in Togo and approve the Management Report and Recommendation. These are reported below.

### A. ONGOING INVESTIGATION

#### **TANZANIA** **RESILIENT NATURAL RESOURCE MANAGEMENT FOR TOURISM AND GROWTH** **(REGROW)**

#### PROJECT INFORMATION

<b>Project No.</b>	<b>P150523</b>
<b>Region</b>	Eastern and Southern Africa
<b>IDA Credit Amount</b>	US\$150 million
<b>Board Approval Date</b>	September 27, 2017
<b>Closing Date</b>	February 28, 2025

The project development objective is 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.

Note: Details of the two Requests, two Management Responses, and both of the Panel's recommendations are presented in the earlier section, Section 02. Eligibility.

#### PANEL INVESTIGATION

The Panel's ongoing investigation examines the Requesters' claims of harm in both the First and the Second Request. The investigation includes a review of the design of the Project with respect to the identification and preparation of safeguard documents, management of environmental and social risks in relation to the use of force by TANAPA, and involuntary resettlement in relation to communities residing in RUNAPA and accessing resources in this protected area. It also reviews the Bank's due diligence of TANAPA's capacity, operating procedures, and processes, the Project's implementation, and Bank supervision of the Project.

As of June 30, 2024, the Panel's investigation remained ongoing.

## B. COMPLETED INVESTIGATION

BOLIVIA

SANTA CRUZ ROAD CORRIDOR CONNECTOR PROJECT (SAN IGNACIO–SAN JOSÉ)

### PROJECT INFORMATION

Project No.	P152281
Region	Latin America and Caribbean
IBRD Loan & IDA Credit Amounts	IBRD Loan Amount: US\$200 million IDA Credit Amount: US\$30 million
Board Approval Date	January 11, 2017
Closing Date	May 31, 2025

The project development objective is to improve transport accessibility along the road corridor between San Ignacio de Velasco and San José de Chiquitos.

### THE REQUEST

The Request for Inspection was submitted on December 19, 2022, by four individuals who stated that they are the leaders of four Centrales Chiquitanas (organizations of Chiquitano Indigenous People) in the Chiquitania region of the eastern Bolivian lowlands. They authorized two local civil society organizations to represent them, and the Bank Information Center—a US-based, nongovernmental organization—to provide them with support and advice during the Panel process. The Requesters and their representatives asked the Panel to keep their identities confidential.

The Requesters claimed the Chiquitanos were not meaningfully consulted during the development of the Project’s original Indigenous Peoples Plan (IPP) or informed about the negative impacts, risks, and benefits of the Project during the initial consultation on the IPP. They claimed the revised IPP, agreed in December 2021 after three years of consultation with the Bank team and the Implementing Agency, while improved and strengthened, still had shortcomings—such as inadequate social and economic benefits, and a lack of measures intended to avoid, minimize, or compensate for the Project’s adverse impacts—and was not being effectively implemented. The Requesters raised concerns that induced impacts from the road upgrade were creating opportunities for settlers to move into the area and engage in illegal activities. The Request raised concerns about the sexual exploitation and abuse, and sexual harassment (SEA/SH) of indigenous women and girls by Project workers. The Request alleged that the Project Contractor’s hiring conditions do not guarantee the labor rights of Chiquitano workers. During the Panel’s field visits, the Requesters voiced concerns related to the right-of-way (ROW), resettlement and compensation, borrow pits, atajados (artificial ponds that provide drinking water for humans and animals), road safety, and road access. The Panel registered the Request on January 13, 2023.





### MANAGEMENT RESPONSE

In its February 2023 Response to the Request, Management stated its firm view that the Project is not the cause of the alleged current and ongoing harm resulting from the economic and demographic changes described in the Request. Management asserted that broader economic and social issues cannot be addressed through a project-level safeguard instrument, such as the IPP. Management acknowledged that IPP implementation had been delayed by two years due to various external factors. Management also recognized the concerns related to Occupational Health and Safety (OHS) and other labor issues and brought them to the attention of the Implementing Agency and the Project Contractor. Management claimed that potential SEA/SH issues had been considered at the Project design stage and that targeted mitigation measures had been implemented.

### PANEL RECOMMENDATION / BOARD APPROVAL / REFERRAL TO DISPUTE RESOLUTION

After visiting Bolivia in March 2023, the Panel submitted its Report and Recommendation on March 17, 2023, recommending to the Board an investigation into the alleged issues of harm and related noncompliance with the applicable World Bank policies, focusing on Environmental Assessment (OP/BP 4.01), Indigenous Peoples (OP/BP 4.10), and Involuntary Resettlement (OP/BP 4.12). The Panel noted there were conflicting assertions by the Requesters and Management, and it was not possible to assess whether Management had dealt appropriately with the issues raised or sufficiently demonstrated it followed Bank policies and procedures. On March 31, 2023, the Board approved the Panel's Recommendation to investigate.

As per the Inspection Panel and Accountability Mechanism Resolutions, following the Board's approval of the Panel's Recommendation, the Accountability Mechanism Secretary (AM Secretary), as Head of the Dispute Resolution Service (DRS), offered the Requesters and Borrower (the Parties) the opportunity to pursue a dispute resolution process facilitated by the DRS. On May 12, 2023, the AM Secretary informed the Board, the Panel, and Bank Management that there was no agreement from both Parties to enter into dispute resolution.

## PANEL INVESTIGATION

The Panel therefore commenced its investigation, in accordance with the Inspection Panel and Accountability Mechanism Resolutions. The Panel published its Investigation Plan on its website on May 16, 2023.

The Panel submitted its Investigation Report to the Board on February 12, 2024, and later shared it with the Requesters on a confidential basis so they could meaningfully take part in the Management consultation on the Management Action Plan (MAP) responding to the Panel's findings.

The key findings of the Panel's investigation related to the analysis of the Project's potential, adverse effects, and free, prior, and informed consultation. The Panel found that Management did not ensure that the Social Assessments had adequate breadth and depth of analysis of the Project's potential adverse effects on the Chiquitano communities in the Project area. The Panel also found Management did not ensure an adequate process of free, prior, and informed consultation with the Chiquitano communities.

The Panel noted several problems with—and community concerns about—the discrepancies between the IPP objectives and the design and the implementation of some projects and activities proposed under the IPP. One such discrepancy arose from the inadequate assessment of potential adverse impacts and the resulting absence of mitigation measures in the IPP. The Panel noted some of the IPP projects focused on “outputs” and the Panel is concerned they are being implemented without creating meaningful or sustainable “outcomes” for the beneficiaries.

The Panel found the implementation of the Environmental and Social Impact Assessment (ESIA) and Environmental Management Plans (EMPs) for borrowing pits to be inadequate. The Panel noted the wide “power” imbalance between the Project Contractor and Chiquitano communities during the negotiation of agreements for the use of land and cited the stringent nondisclosure and arbitration clauses included in the agreements. The Panel found Management did not ensure provision of measures to minimize, mitigate, or compensate adequately for the negative impacts, including affording adequate support to the Chiquitano communities regarding the Contractor's negotiated access to their lands for borrow pit development. The Panel found Management did not ensure proper identification or mitigation of the impacts on atajados. Although the Panel found Management in compliance for minimizing resettlement, it found Management in noncompliance for not ensuring payments of compensation prior to taking of land and related assets, and for not ensuring an adequate process for compensation payments.

On road safety, OHS and labor working conditions, the Panel found Management did not ensure adequate implementation of the ESIA and road safety measures to protect the community and workers' health, safety, and livelihoods. The Panel also found that, prior to submission of the Request, Management had not safeguarded the adequate implementation of OHS measures, including working conditions. While the Panel noted Management's increased focus on these issues after submission of the Request, serious concerns remained.

The Panel noted the Project had established a comprehensive system to prevent and address SEA/SH—which underwent continuous enhancement in response to reported incidents and allegations—incrementally improving its effectiveness and responsiveness. While the Bank and the Project continue to work on some SEA/SH issues, the Project's retrofitting undertaken in 2019 has strengthened its system for preventing and managing SEA/SH issues. The Panel was pleased to see that Management incorporated the lessons learned from previous Panel investigations in Uganda and the Democratic Republic of Congo into the Project design.

## MANAGEMENT ACTION PLAN & BOARD ACTIONS

In response to the Panel's Investigation Report, the March 2024 Management Report and Recommendation (MRR) acknowledged many of the Project's shortcomings regarding compliance with Bank safeguard policy requirements. The MRR includes a MAP, which outlines actions in five areas for both the Implementing Agency and the Bank in relation to the grievance redress mechanism (GRM), borrow pits, atajados, road safety, and OHS.

- i. GRM. The GRM Manual will be updated and cleared, and training and capacity-building will be conducted with Administradora Boliviana de Carreteras (ABC) staff, the Contractor, and the supervision firm. ABC will continue to disseminate the function and utility of the GRM within the Project area. The wider grievance redress system will be assessed to identify recommendations for further improvement.
- ii. Borrow Pits. A protocol will be developed, cleared, and applied to ensure comprehensive assessments of environmental and social risks and impacts associated with borrow pit exploitation, and a methodology for approaching landowners. This will appropriately consider their inputs and create a proper process for negotiating access to land for borrowing pits or material extraction sites.
- iii. Atajados. A detailed report on atajados will be prepared and reviewed, which will include a full inventory of all atajados in the ROW and assess all relevant environmental and social risks and impacts associated with them. All mitigation and/or remedial measures in said report will be implemented. The Water Resource Management Plan will be continuously updated.
- iv. Road Safety. The road safety EMP will be updated every three months, and compliance with it will be assessed at least monthly through road safety field supervision. The capacity to address road safety issues will be strengthened.
- v. OHS. Capacity to address OHS in road construction will be strengthened in line with good international practice. All pending grievances related to OHS will be addressed. A report will be produced containing details regarding the recommendations made in the August 2023 OHS audit.

The Board met on May 16, 2024, to consider the Panel's Investigation Report and approve the MAP. The Panel's Investigation Report, its non-technical summary, and the Management Report and Recommendation, including the MAP, are available on the Panel's website.

**TOGO, WESTERN AFRICA**  
**WEST AFRICA COASTAL AREAS RESILIENCE INVESTMENT PROJECT, ADDITIONAL FINANCING, AND GLOBAL ENVIRONMENT FACILITY (GEF)**

**PROJECT INFORMATION**

<b>Project Nos.</b>	<b>P162337, P176313, P092289</b>
<b>Region</b>	Western and Central Africa
<b>IDA Credit/Grant Amount</b>	IDA Credit Amount: US\$120 million IDA Grant Amount: US\$70 million
<b>Board Approval Date</b>	April 9, 2018
<b>Closing Date</b>	December 31, 2026

The project development objective is to strengthen the resilience of targeted communities and areas in coastal Western Africa.

**THE REQUEST**

The Request for Inspection was submitted on August 4, 2021, by community members living in the Project area on the Togolese coast. On August 27, 2021, the Panel received additional signatures. The Requesters asked the Panel to keep their identities confidential. The Request involved two subprojects of the West Africa Coastal Areas Project—the Combined Works (construction of new structures and the rehabilitation of existing structures, mainly groynes) and the Emergency Protection Measures (short-term protection against erosion through the installation of concrete pipe walls).

The Requesters alleged that the Project would adversely affect fisherfolk, residents, and property owners along the Togolese coast. They claimed (i) they were under threat of eviction due to the Project, (ii) Project activities had reduced the beach area available for use by fishing communities, which, in turn, affected their livelihoods, (iii) they were concerned about planned involuntary resettlement and associated valuation, compensation, and relocation sites, (iv) the project-affected persons had received neither adequate nor timely Project information and had not been meaningfully consulted about Project activities, and (v) alternatives to the construction aspects of the Project had not been fully analyzed. The Panel registered the Request on September 7, 2021.

**MANAGEMENT RESPONSE, ITS UPDATE, AND PANEL RECOMMENDATIONS**

**Management Response.** Management submitted its Response on October 7, 2021, and updated it on April 19, 2022. In its Response, Management contended the Requesters’ issues mainly concerned Government interventions unrelated to the Project. It also stated that the Bank had followed the policies and procedures applicable to the matters raised in the Request. Management noted that a site-specific Resettlement Action Plan (RAP) was being prepared to cover impacts directly related to the construction of groynes and the safety zones around them. Management also clarified that a final version of the RAP would undergo Bank review and would require a “no-objection” response before it would be considered for implementation. In its Response, Management committed to time-specific, measurable actions to address the concerns raised in the Request.



**Panel Recommendation.** A Panel team visited Togo in October 2021 and met with Government officials, local authorities and representatives, and the Requesters. On November 8, 2021, the Panel submitted its first Report and Recommendation.

Therein the Panel noted that stakeholders, including the Requesters, welcomed the Project's efforts to address coastal erosion. The Panel determined that the Request met the eligibility criteria, except for the allegations of evictions, which were not linked to the Project. The Panel found other alleged harm plausibly related to the Project, based on serious concerns raised by the Requesters over potential noncompliance with Bank policy. The Panel recognized Management's commitments to improve Project implementation, including reviewing the RAP and taking other remedial actions. Therefore, the Panel deferred a recommendation regarding investigation to allow Management time to address the issues. The Board approved this deferral on November 22, 2021.

**Management's Update.** On April 19, 2022, Management's update on the implementation of actions reported intensified support for the Combined Works, specifically on the finalization and disclosure of the RAP and the Environmental and Social Impact Assessment (ESIA). Management provided updates on four of the actions to which it had committed in its Response concerning the Emergency Works: (i) the preparation of the Social Audit, which Management shared with the Panel in May 2022, (ii) a summary of the impact on boat landings near the works, (iii) the implementation of the Local Action and Citizen Engagement initiative, and (iv) the ongoing information campaign.

**Second Panel Report and Recommendation.** On May 3, 2022, the Panel requested—and the Board approved—an extension until June 8, 2022, to submit a second Report and Recommendation. A Panel team visited Togo in May 2022 and met with the Requesters, Government officials, and Project authorities to review and reassess the remedial actions committed to by Management.

In its Recommendation, the Panel acknowledged the positive steps taken by Management to address some of the concerns raised by the Requesters since the Panel's first Report and Recommendation. The Panel also recognized the significance of this Project to Togo and its coastal communities. The Panel, however, remained concerned about the Bank's compliance with Environmental Assessment (OP/BP 4.01), Involuntary Resettlement (OP/BP 4.12), and Investment Project Financing (OP 10.00) and its related Directive. Hence, the Panel recommended proceeding with the investigation.

## BOARD APPROVAL / REFERRAL TO DISPUTE RESOLUTION

The Board approved the Panel's Recommendation for an investigation on June 23, 2022.

As per the Inspection Panel and Accountability Mechanism Resolutions, following the Board's approval of the Panel's recommendation, the Accountability Mechanism Secretary (AM Secretary), as Head of the Dispute Resolution Service (DRS), offered the Requesters and Borrower (the Parties) the opportunity to pursue a dispute resolution process facilitated by the DRS. On August 8, 2022, the AM Secretary informed the Board, the Panel, and Bank Management that there was no agreement from both Parties to enter into dispute resolution.



## PANEL INVESTIGATION

On September 13, 2022, the Panel posted its Investigation Plan on its website and initiated the investigation, which covered (i) the coastal protection and resilience measures and their impact on communities and their livelihoods, (ii) the alleged harm from the involuntary resettlement process, including the inadequacy of compensation, (iii) insufficient disclosure of information, consultation, and access to grievance redress mechanisms (GRMs), and (iv) Project supervision. The Panel submitted its Investigation Report on April 20, 2023. It highlighted the following key findings:

- i. Fishers, Value Chain, and Livelihoods. The Panel found that the Project lacked a thorough understanding of the community's beach seine-fishing method and its value chain, particularly concerning mareyeuses—fishmongers. Beach seine-fishing is labor-intensive and involves vulnerable groups like women and children. The Panel noted that the Project's mitigation efforts aimed at promoting income-generating activities were insufficient and failed to address the most affected community members.
- ii. The Emergency Works. The Panel found that classifying the Emergency Works as Category C resulted in the omission of a detailed ESIA. Such an assessment could have identified health and safety risks that were created by the construction and broken pipes. The Panel noted the reports of injuries and damage to fishing equipment caused by the pipes. The Panel concluded that working conditions were hazardous and lacked safety measures. Furthermore, no consideration was given to decommissioning the pipes despite knowing they were a temporary solution.
- iii. Resettlement. The Panel agreed with Management that the Project minimized resettlement but found socioeconomic data lacking, particularly regarding home-based mareyeuses and dependents. It noted insufficient support to restoring the livelihoods of resettled community members, and their participation was limited to compensation negotiations that occurred after the majority of resettlement decisions had already been made.

- iv. The Combined Works. The Project analyzed various designs to address coastal erosion, initially including the Kpémé to Aného area, which was later excluded. The Panel found that the Project did not consider the impact of this exclusion. The Panel believes the groynes built west of Kpémé will disrupt sediment flow, potentially increasing erosion and flooding, which could lead to more frequent flood events elsewhere.

The Panel shared the investigation's findings with the Requesters and community members so they could participate more effectively in the consultations on the Management Action Plan (MAP) included in the Management Report and Recommendation (MRR) responding to the Panel's investigation.

## MANAGEMENT ACTION PLAN

On June 2, 2023, Management submitted the MRR to the Board. On September 12, 2023, the Board met to consider the Inspection Panel's Investigation Report, and approve Management's MAP, covering the following actions:

- i. Environmental and Social Screening for Emergency Works. The Borrower would hire a contractor to monitor pipe integrity and manage repairs in the Emergency Works area and hire community members to assist with that monitoring. Bank Management would review the contract scope and provide recommendations as necessary.
- ii. Construction of Emergency Works and Working Conditions. The Borrower would advise communities about the availability of GRMs for claims related to injuries or unpaid wages, which would need to be filed by the end of 2023. Bank Management would review the outreach about GRMs to affected communities.
- iii. Livelihood Restoration. The Borrower would commission an audit of the resettlement process, and Management would review the proposed terms of reference and audit report for clearance by the Bank.
- iv. Impact from the Combined Works on the Fishing Community. The Borrower would prepare a subproject to support economic activities and improve resilience of those living in the coastal zone. Management would provide technical assistance and clearance to the Borrower on the design process. In coordination with the Food and Agriculture Organization of the United Nations, Management would also commission a study on beach seine-fishing in West Africa, looking at challenges related to coastal erosion.

The Board of Executive Directors approved the MAP and Management committed to providing the First Progress Report on the implementation of the MAP in September 2024.

# IV. OTHER HIGHLIGHTS OF FISCAL YEAR 2024





## COMMEMORATION OF 30 YEARS OF THE INSPECTION PANEL

In Fiscal Year 2024, the Inspection Panel continued to organize and conduct activities with various stakeholders to commemorate its 30-year anniversary in 2023. It published [Inspection Panel at 30 Years](#), a document with links to videos, events, publications, and podcasts. Notable activities during the fiscal year included:



### VIDEO

The Panel released [a video](#) that showcases its history, impact, and core principles since its creation in 1993, featuring voices from internal and external stakeholders involved in or influenced by the Panel's work.



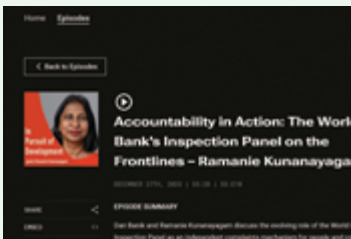
### EVENT

On October 31, 2023, the Center for Global Development (CGD) hosted a panel discussion on [“Thirty Years of the Inspection Panel”](#) and its impact over the last three decades, drawing upon the experience and lessons of inspection cases. (The livestreamed video is available [here](#).) Speakers included former panel chairperson Ramanie Kunanayagam; Zarau Kibwe, World Bank alternate executive director representing 22 African countries; Gina Barbieri, an expert on accountability systems and practice; and Dyhia Belhabib, executive director, Nautical Crime investigation services. Karen Mathiesen, a CGD project director and former senior civil servant in the U.S. Treasury Department's Office of International Affairs, moderated the discussion.



### PUBLICATION

The Inspection Panel contributed an essay titled [Glass Half Full or Glass Half-Empty? Thirty Years of Accountability at the Inspection Panel – The Impact of its Work and What the Data Tells Us](#) to a compendium of essays called [The Perspectives Project: Documenting and reimagining IFI Accountability](#) published by American University's Washington College of Law. The compendium marks the 30th anniversary of the launch of the Inspection Panel and the establishment of other accountability mechanisms in development finance thereafter.



### PODCASTS

Ms. Kunanayagam represented the Inspection Panel to present the Panel's role and remit, its case work, and its advisory reports in three podcasts available at [Global Development Review](#), [The Looking Glass—SAIS Review of International Affairs](#) (joined by Dyhia Belhabib), and [In Pursuit of Development](#).

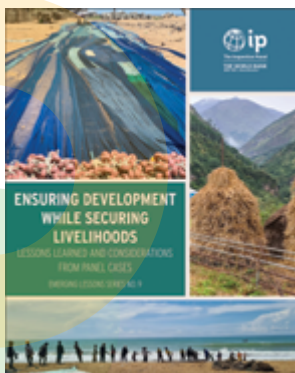
## NEW PANEL MEMBER AND ELECTION OF NEXT CHAIRPERSON

On March 26, 2024, the Inspection Panel members unanimously elected Ibrahim Pam to serve as the next Inspection Panel Chairperson commencing November 17, 2024, upon the term conclusion of the incumbent Chairperson, Mark Goldsmith.

Evelyn Dietsche joined the Inspection Panel on April 8, 2024, succeeding Ms. Kunanayagam, whose term concluded on April 7, 2024. Ms. Kunanayagam reflected on her five-year tenure with the Panel in her exit interview, available [here](#).



## ADVISORY REPORT



On November 29, 2023, the Inspection Panel released its ninth advisory report as part of its Emerging Lessons Series. The report—[Ensuring Development While Securing Livelihoods – Lessons Learned and Considerations from Panel Cases](#)—delves into the key issues affecting livelihoods in the context of World Bank-financed projects. Livelihoods are a critical aspect of any development project, as they directly affect the well-being, social cohesion, and economic resilience of affected communities. Drawing on cases handled by the Inspection Panel over seven years, the report provides valuable insights and lessons from the Panel's work on livelihoods challenges linked to involuntary physical and economic resettlement.

## OUTREACH

In June 2023, nine independent accountability mechanisms hosted an outreach workshop for civil society organizations (CSOs) in seven countries in the Eastern Africa region. The workshop was attended in person by the Chairperson of the Inspection Panel, Mark Goldsmith, and William Romans, Head of Operations for the Dispute Resolution Service.

Mr. Goldsmith led the opening plenary session, which covered the origins of the Independent Accountability Mechanisms (IAMs), the global accountability network known as "IAMnet," the guiding principles of the IAMs, and their core objectives, common activities, mandates, and limitations. In addition, he and Mr. Romans jointly presented a session on how both the World Bank's compliance and dispute resolution processes of accountability operate and can be accessed. The CSOs had their questions answered by the representatives of the IAMs.



## PANEL CHAIRPERSON'S PRESENTATION



In February 2024, Panel Chairperson Mark Goldsmith was invited to speak to researchers at the London headquarters of the Overseas Development Institute, a global affairs think tank. Mr. Goldsmith's [presentation](#) described the Panel's history and structure, highlighting the publication of nine emerging lessons advisory reports, and sharing the World Bank's new vision and mission under President Ajay Banga. The focus of Mr. Goldsmith's presentation was dedicated to issues around climate change, presenting the Panel's findings and lessons learned from its investigation of the West Africa Coastal Areas Resilience Investment Project in Togo against the backdrop of the Bank's ambitious climate finance goals.

## ANNUAL MEETINGS 2023 IN MOROCCO

In October 2023, Ms. Kunanayagam and Mr. Goldsmith represented the Inspection Panel at the 2023 World Bank Annual Meetings in Marrakech, Morocco. Ms. Kunanayagam was a panelist in two sessions hosted by civil society titled "An Evolution to Accountability Roadmap: Lessons for the Bank's New Chapter" and "Barriers to Accessing Accountability for World Bank Group-funded Projects in the MENA Region."

Ms. Kunanayagam and Mr. Goldsmith participated in several CSO meetings and attended meetings on how the Bank is planning to achieve its new vision "To end extreme poverty and boost prosperity on a livable planet," where they heard the Bank's latest thinking on how to streamline the implementation of the World Bank Environmental and Social Framework. More information is available [here](#).



## IAIA 2024 IN IRELAND

In April 2024, the World Bank Inspection Panel team participated in the 43rd annual conference of the International Association for Impact Assessment held in Dublin, Ireland, under the theme "Impact Assessment for a Just Transformation." The Inspection Panel co-organized a session titled "Accountability, Impact Assessment and Their Capacity to Transport Projects" together with four other IAMs. It presented to and discussed with a small group the Panel's investigation and findings regarding the West Africa Coastal Areas Resilience Investment Project, Additional Financing, and Global Environment Facility (GEF) case in Togo.

# APPENDIX I:

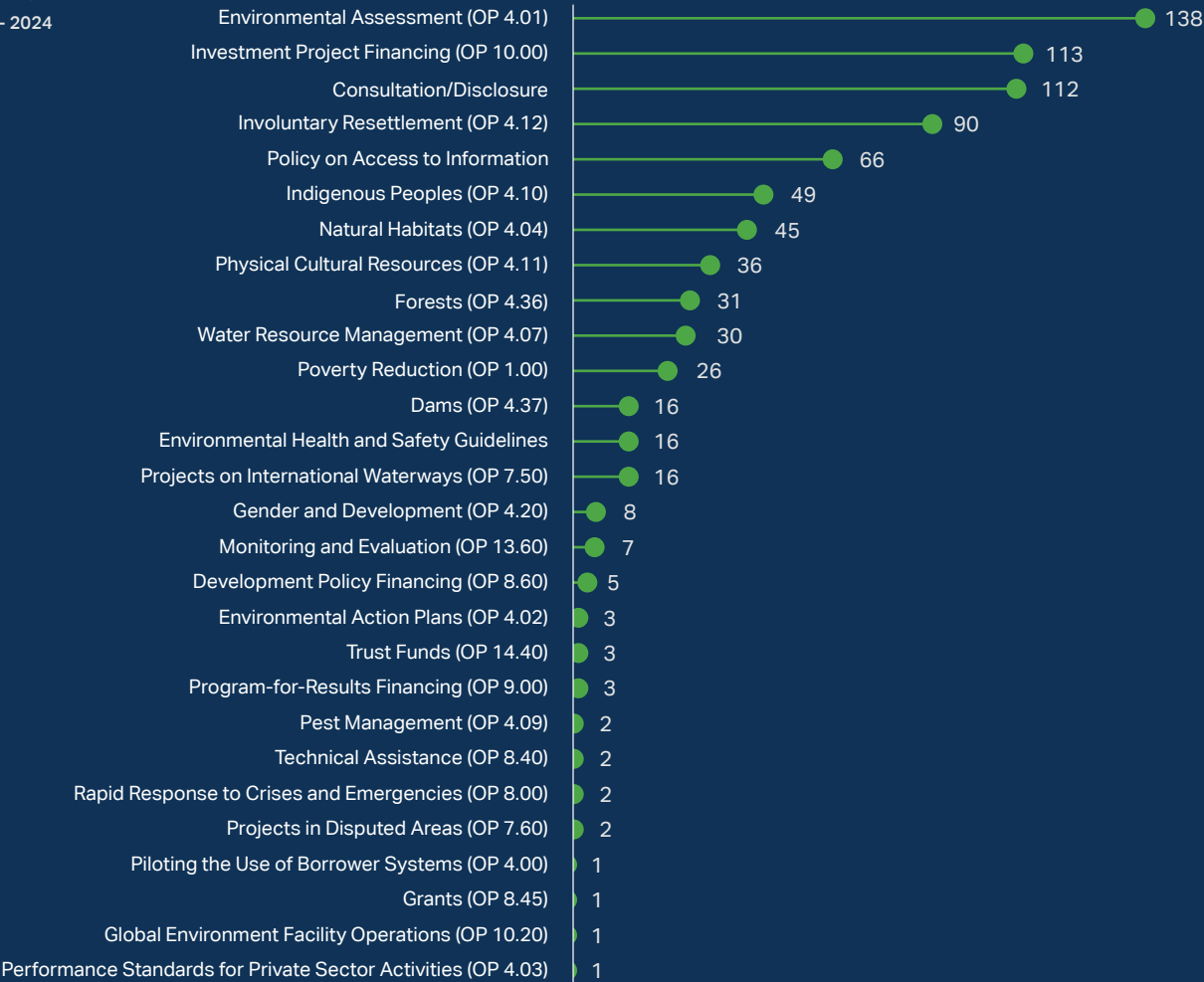
## GRAPHS ON PANEL CASES, FISCAL YEARS 1995-2024

CASES RECEIPT  
(FISCAL YEARS)



MAJOR POLICY ISSUES  
RAISED IN REQUESTS

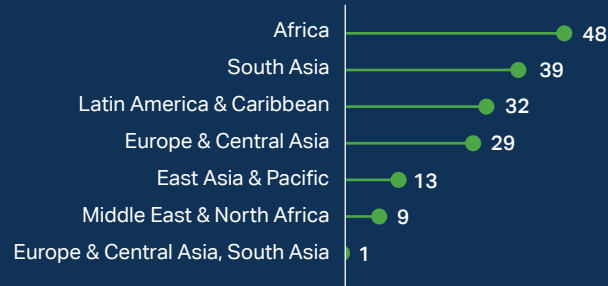
Year Range: 1995 - 2024





## REGIONAL DISTRIBUTION OF CASES

Year Range: 1995 - 2024



## TYPE OF COMPLAINANTS

Year Range: 1995 - 2024



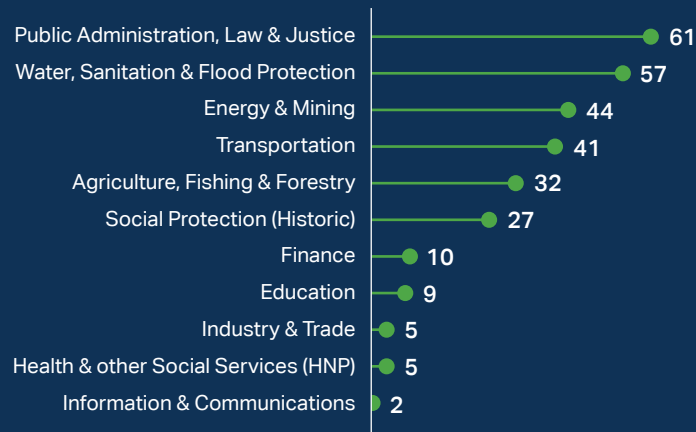
## PROJECT FUNDING SOURCE

Year Range: 1995 - 2024



## CASES SECTOR

Year Range: 1995 - 2024



## CASES PROCESSING HISTORY

Year Range: 1995 - 2024



**APPENDIX II:**  
**FY24 BUDGET**  
(JULY 1, 2023-JUNE 30, 2024)<sup>1</sup>

SALARIES <sup>2</sup>	1,274
BENEFITS <sup>2</sup>	868
COMMUNICATIONS & IT SERVICES	59
EQUIPMENT & BUILDING SERVICES	175
TEMPORARIES & ETCS	-
CONSULTANTS <sup>3</sup>	1,151
TRAVEL	505
REPRESENTATION & HOSPITALITY	11
CONTRACTUAL SERVICES	129
OTHER EXPENSES	22
<b>TOTAL BUDGET SPENT</b>	<b>4,202</b>
<b>TOTAL BUDGET RECEIVED</b>	<b>4,310</b>

<sup>1</sup>All amounts are to be multiplied by one thousand

<sup>2</sup>Includes Chairperson's salary and benefits

<sup>3</sup>Includes Panel Members' fees

## APPENDIX III: BIOGRAPHIES OF PANEL MEMBERS



### MARK GOLDSMITH

**Panel Member (2019–present),  
Chairperson (2024)**

Mark Goldsmith, a United Kingdom citizen, was appointed to the Inspection Panel on November 17, 2019. He served as the Chairperson of the Panel December 15, 2023–November 16, 2024. Following the completion of his five-year term, the Board asked Mr. Goldsmith to continue as a Panel Member due to a delay in the recruitment of a successor Panel Member.

Mr. Goldsmith brings to the Panel more than 25 years of experience managing complex projects and teams across the financial services, development, strategy consulting, and energy sectors. His leadership extends to both the public and private sectors where he has demonstrated an ability to manage multi-stakeholders, understand complex issues, and lead the implementation of industrywide and sector-leading solutions at both a Board and Senior Management level. Through his work in both emerging and developed economies, Mr. Goldsmith has dealt with a wide portfolio of complex and sensitive matters including environmental, social, sustainability, safety, risk management, and governance issues—experience that has provided great value to the Panel. From 2014 to 2019, Mr. Goldsmith was a non-executive director of ENEO, the power company of Cameroon, and chaired its board subcommittee on Environmental, Social and Governance (ESG) issues for four of those years. In 2015, Mr. Goldsmith created his sustainability consultancy “FiveOak,” from which he took a sabbatical in 2024 to assume the fulltime Inspection Panel Chairperson role in Washington, D.C. As founding Managing Director of FiveOak, Mr. Goldsmith has led several assignments, including providing ESG expert advice to an East Africa private equity fund and its portfolio companies and developing environmental and social training for trainers for CDC Group (renamed British International Investment) on the International Finance Corporation’s Performance Standards. Mr. Goldsmith is a recognized leader in ESG thinking in the emerging markets and was Director, Responsible Investment for Actis for more than 10 years. During that time, he developed and promoted worldclass standards in business integrity, health and safety, social, environmental, and climate change areas across all investment areas and companies, and implemented robust corporate governance standards and transparent practices.

Mr. Goldsmith has a BA in manufacturing engineering from the University of Nottingham and an MA, with distinction, in environmental pollution control from the University of Leeds.



## IBRAHIM PAM

**Panel Member (2023),  
Chairperson (2024-present)**

Ibrahim Pam, a Nigerian national, was appointed to the Inspection Panel on January 1, 2023, and became Panel Chairperson on November 17, 2024. Mr. Pam is an accomplished international lawyer, analyst, and investigator with strong leadership experience, specialization in investigating mass crimes, human rights abuses, fraud, and financial crimes, and expertise in internal oversight and accountability of international institutions. His most recent position was Head ad interim of the Independent Redress Mechanism at the Green Climate Fund, and before that he was pioneer Head of the Fund's Independent Integrity Unit from 2016.

Mr. Pam worked as an Analyst and Investigator in the Office of the Prosecutor at the International Criminal Court (ICC) 2005–2012, and then as Chief Investigator in the Integrity and Anti-Corruption Department of the African Development Bank (AfDB) 2012–2015. He was Team Leader and Resident Investigator at the United Nations Office of Internal Oversight Services for the UN Mission in South Sudan, with concurrent responsibility for the United Nations Interim Security Force for Abyei, and additional assignments to the UN Multidimensional Integrated Stabilization Mission in the Central African Republic 2015–2016. In 2000–2001, Mr. Pam worked as Special Legal Assistant to the Nigerian Truth Commission, which among other things dealt with environmental and human rights issues in the Niger Delta. From 2001–2005, he served as Chief Legal Officer in the Nigerian Anti-Corruption Commission where, as Lead Expert delegate for Nigeria, he participated in the drafting of the African Union Convention on Combating and Preventing Corruption, and the UN Convention Against Corruption. He also helped develop the General Principles for Review of Investigative Offices of the Conference of International Investigators. In 2018, on behalf of the host organization (the Green Climate Fund), he chaired the Conference of International Investigators, a forum for investigators of international organizations. He is also concurrently a Member of the Independent External Oversight Advisory Committee of the Joint United Nations Programme on HIV/AIDS, and Chair of the Ad Hoc External Panel on Workplace Culture for the Office of the Prosecutor of the International Criminal Court. In addition, he serves as a Member of the Advisory Board of the African Association of International Law.

Mr. Pam holds a Bachelor of Laws (LLB. Hons) degree from the University of Jos, and a Master of Science (MSc) degree in Criminal Justice Policy from the London School of Economics and Political Science. He is called to the Bar as a Barrister and Solicitor of the Supreme Court of Nigeria.





## EVELYN DIETSCHKE

### Panel Member (2024-present)

Evelyn Dietsche joined the Panel for a five-year term commencing April 8, 2024. She is a German citizen resident in Switzerland with nearly 30 years of operational and strategic-managerial experience in the multinational corporate sector and the international advisory and consultancy business. A recognized international expert, Dr. Dietsche has extensive practical knowledge of natural resource governance, and has taught, supervised, published, and peer-reviewed research on this and related topics, including with the Centre of Energy, Petroleum, and Mineral Law and Policy at University of Dundee, Chatham House, the Centre for Social Responsibility in Mining at Queensland University, and the United Nations University World Institute for Development Economics Research.

Following an advisory position with the Namibian Ministry of Finance as a fellow of the Overseas Development Institute, Dr. Dietsche served the development consultancy Oxford Policy Management Ltd, based in the United Kingdom, as a fiduciary risk and public policy analyst for a variety of assignments mainly across Sub-Saharan Africa, the Caribbean, and the Middle East, and provided thought leadership for a multi-year initiative on leveraging and mitigating the impacts of the mining sector on developing countries, funded by the International Council on Mining and Metals in collaboration with the Commonwealth Secretariat and the World Bank. In 2009 she joined the social performance team of BG Group (now part of Shell) as sustainable development manager before setting up her own company in 2013 and continuing to provide BG Group and other extractive industry companies with hands-on, operational, and strategic advice on the macroeconomic and social impacts of their investments. In addition, she advised several multinational and bilateral development agencies on policies for the management of cumulative sector impacts, on local content and skills development, and on the impacts of climate policies. In 2020 she joined swisspeace, a peace and conflict research and practice institute affiliated with the University of Basel, Switzerland, to lead and develop the “Business & Peace” and “Resources & Conflict” programs.

Dr. Dietsche holds a PhD in Resources Sector Governance from the Centre for Energy, Petroleum and Mineral Law and Policy (University of Dundee, Scotland), an MSc in Development Economics from the School of Oriental and African Studies (University of London), and an MA in Public Policy and Management from Konstanz University (Germany).



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