

*Via electronic email*

San Rafael, July 20, 2024

Board of Directors  
World Bank Group  
1818 H Street,  
NW Washington, D.C. 20433

**RE: Concerns and Recommendations of the Chiquitano Indigenous Communities Regarding the Approved Management Action Plan to Address the Findings of the Inspection Panel Investigation Report No. 187506-BO**

Dear Board of Directors,

Greetings from the Association of Cabildos of San Ignacio de Velasco (ACISIV), the Central of Indigenous Communities of San Miguel (CCISM), the Association of Indigenous Communities of San Rafael de Velasco (ACISARV), and the Central of Indigenous Communities of Chiquitos TURUBO. Our organizations represent communities affected by the World Bank San José-San Ignacio road upgrade [project](#).

Due to the violation of our rights during the implementation of the project, we initially approached the Bolivian Road Administrator (ABC) but received no response. Subsequently, we turned to the World Bank, where our issues were partially addressed, but the problems caused by the project were neither resolved nor adequately handled. After nearly three years of unresponsive dialogue, we filed a complaint with the Inspection Panel, which was accepted as eligible.

The Inspection Panel visited our communities twice and found that the World Bank failed to provide effective compliance with its Operational Policies, resulting in adverse impacts on our communities. The Panel then presented us with a summary of its investigation findings and informed us that the Bank's Management would propose an Action Plan based on their report.

In February this year, we attended a meeting in San José de Chiquitos, where the World Bank Management presented the proposed Action Plan. During this meeting, we expressed our dissatisfaction and presented recommendations to resolve the identified problems. However, we have not received any direct communication regarding the Action Plan since then.

In May, when the Inspection Panel published its investigation, the Management Action Plan (MAP) was approved by the World Bank's Board and published. We learned about this from third parties without receiving direct communication or an explanation about the final version of the MAP from the Bank. Thanks to the support of our allies, we received access to the document and found that it does not include actions to address some of the damages identified in the Panel's investigation. The main points that the MAP fails to address are:

1. **Engagement with Indigenous Peoples for the implementation of the MAP.** The MAP itself doesn't include any provisions for Indigenous Peoples' engagement in its implementation. It lacks a process of engagement and collaboration with impacted Indigenous communities for the implementation of the MAP. The fact that the Bank proposes a MAP without our participation contradicts the Panel's findings.
2. **Right of Way.** There are no measures to remedy the adverse impacts caused by the right-of-way acquisition processes, including compensation payments and valuation methodology. The Inspection Panel observed that the World Bank did not confirm the payment of compensation before the acquisition of land and assets, nor an adequate process for these payments. We request that these processes be transparent, explained to the communities, and that compensation be provided where adequate compensation has not been given.
3. **Projects in progress under the Indigenous Peoples Plan (IPP).** The MAP does not include corrective measures to guarantee compliance with those IPP projects where discrepancies have been found between the stated objectives, the actual projects, and their outcomes. Examples include a women's handicraft center that is too small and lacks sufficient electricity and a livestock project with wells that do not provide water for human or animal consumption.
4. **Strengthening Indigenous Organizations.** The Action Plan does not include measures to support the participation of Indigenous Peoples authorities in the project or in the MAP. For example, one of the main expenses for communities is transportation to monitor what is happening along the road, and this expense is not considered.

We feel once again marginalized and ignored, victims of a development scheme that disregards us and disrupts our ways of life. We do not wish to continue suffering in silence from the consequences of a project flawed in design and execution from the beginning.

Given this situation, we propose taking into account the following recommendations:

1. **The Bank should better engage with Indigenous leaders in implementing the MAP and guarantee their participation throughout the entire process.** This includes working with the Indigenous authorities not only to implement all the measures outlined in the MAP but also to address issues not included, such as the right-of-way, IPP projects with inconsistencies between stated and actual objectives, and providing funding for the participation of Indigenous leaders in implementing the action plan.
2. **The process of updating the Grievance Redress Mechanism Manual should consider the participation of communities or Indigenous authorities from the beginning.** This includes participating in the hiring process of the person in charge of the update (preparing the ToRs), who must have experience with Chiquitano

Indigenous communities, and collaborating with the hired person in the manual's preparation process.

3. **When developing the protocol to address the adverse impacts generated by borrow pits, the Bank should consider the following points:**
  - a. **Affected communities or their authorities must participate in the entire process of developing the protocol.** This includes preparing the ToRs for hiring the consultant responsible for developing the protocol, selecting the consultant (who must have knowledge of the area and Chiquitano communities), developing the work plan, and providing comments on the draft protocol before the final version is approved.
  - b. **The comprehensive evaluation of borrowing pits should include all borrow pits to confirm that even those reported closed are indeed closed.** Additionally, the participation of impacted communities or their authorities must be ensured throughout the entire evaluation.
4. **The report with the inventory and evaluation of atajados should be developed in collaboration and consultation with the impacted communities or their indigenous authorities.** Community participation is necessary at all stages of the process, which includes preparing the ToRs for the consultant, the selection process, the work plan, and considering the community's observations on the final report.

We hope our recommendations will be taken into account to effectively remedy the problems caused by the road project and ensure that our rights are respected.

Sincerely,



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