

Open Letter: Release the Torwali Indigeneity Screening Report and End Ongoing Harms in Swat Valley, Pakistan

To: The President, World Bank Group

cc: World Bank Board of Directors, World Bank Energy Department, Pakistan Country Office, UN Special Rapporteur on Climate Change, UN Special Rapporteur on the rights of Indigenous Peoples, United Nations Working Group on Business and Human Rights.

Subject: Immediate Disclosure of the World Bank's Indigenous Peoples Screening Report concerning the Torwali community in the context of the Khyber Pakhtunkhwa Hydropower and Renewable Energy Development Program.

We - the undersigned movement and Indigenous Peoples' organization representing Madyan Hydropower Project affected Indigenous Torwali communities and supporting civil society groups, advocates and scholars worldwide - strongly urge the World Bank to immediately release the long-delayed Indigenous Peoples Screening Report concerning the Torwali people in the context of the Khyber Pakhtunkhwa Hydropower and Renewable Energy Development Program (KHRE) , including the Madyan Hydropower Project (MHPP). For more than a year, the report has been withheld from the Torwali people, who will be affected by the KHRE program.

We are also alarmed by new developments as the World Bank has recently [withdrawn financing for the MHPP](#) as part of the broader [restructuring of the KHRE program](#). This withdrawal does not absolve the World Bank's responsibility for releasing the results of the 2025 screening of Torwali people that it commissioned, or for admitting the documented failures in its due diligence and compliance with its safeguard processes. Furthermore, the selective withdrawal has raised new questions regarding the ongoing investment in other components of the KHRE program, basin-wide risks in the Swat valley, and the feasibility of the broader hydropower development strategy. The Bank remains financially and institutionally engaged in the KHRE Program, including through the Gabral-Kalam Hydropower Project, and the restructuring leaves open the possibility of further investments by the Bank and encourages [other actors to invest in hydropower projects](#) in the Swat River valley.

The Bank should therefore clarify whether the findings of the Indigenous Peoples screening undertaken in connection with MHPP and the KHRE Program have implications for the continuing program and how those findings are being incorporated into its ongoing operations. Withholding these findings and their rationale denies the Torwali meaningful access to the outcome of a process in which they advocated for more than a year holding meetings in Pakistan, engaging with the Bank's senior management, and exchanging hundreds of emails with Bank staff. This undermines the Bank's own commitments and safeguards.

The Bank must disclose the outcomes of the screening, state its determination regarding the recognition of the Torwali as an Indigenous People, and ensure that no further harm results from the KHRE Program or from the projects pursued separately by the Government of Khyber Pakhtunkhwa in connection with the Program.

Repeated denial of the Torwali's Indigenous identity and ongoing exclusion by the Bank

From the outset, the Khyber Pakhtunkhwa Hydropower and Renewable Energy Development Program (KHRE), including a cascade of dams on the Swat River, proceeded without recognizing the Torwali as an Indigenous People, without consultation, and without securing their Free, Prior, and Informed Consent (FPIC), in violation of OP 4.10/OP 4.12 and ESS7/ESS10. The 207 MW

Madayan Hydropower Project (MHPP) has particularly violated due process and environmental and social safeguards.

The Torwali are an ancient Dardic-speaking community whose identity and livelihoods are closely tied to the Swat River. They have been excluded from meaningful consultation, denied access to key project documents in appropriate languages, and left without an effective grievance mechanism. Despite sustained good-faith engagement through the Darya-e-Swat Bachao Tehreek, these issues remain unresolved.

The MHPP's design threatened irreversible ecological and livelihood harm in Torwali territory through river diversion, reduced water flows, and damage to agriculture, biodiversity, and glacier-fed systems, as seen with the nearby Darra Khwar HPP. The broader KHRE Program, with three other hydropower projects in the pipeline, continues to threaten the Torwali. The KHRE cascade model overlooks cumulative climate and flood risks, despite the 2022 floods and the Bank's own climate warnings and contradicts Pakistan's least-cost energy planning while ignoring community-centered alternatives. These operations have placed the community at significant risk and repeat patterns of exclusion, environmental harm, and disregard for Indigenous rights that the Bank has pledged to address.

Continuing to deny recognition of the Torwali as Indigenous and withholding the screening report cannot be justified as an administrative decision. This action affects the rights, dignity, and access to information of Indigenous Peoples, and undermines the credibility of the Bank's commitments to its own policies and international protections.

A Flawed Action Plan and Forced Escalation

Following sustained pressure, the World Bank committed to a revised Action Plan for the project. However, the process was marked by lack of transparency, delays, weakened FPIC, additional design harms, and an attempt to delegate communication to the implementing agency - the Pakhtunkhwa Energy Development Organization (PEDO), which the community has repeatedly identified as a source of exclusion, bias, reprisals, and intimidation.

The lack of a direct, transparent engagement channel with the Torwali undermined trust and made the process procedurally deficient.

The Indigeneity Re-Screening—and Its Withholding

After persistent advocacy, the Bank conducted a formal re-screening process in 2025 to assess the Indigenous status of the Torwali people. Community members participated in good faith and shared their time, knowledge, and hospitality with Bank-appointed experts.

However, more than a year later, the results of this screening remain undisclosed.

This delay is not merely administrative; it represents a failure to meet ongoing responsibilities. The report's findings are directly relevant to the applicability of FPIC, the scope of safeguards, and the community's ability to protect its land, culture, and future under the KHRE Program. The continued denial of Indigenous recognition violates the fundamental right of self-determination.

Continued refusal to disclose the report denies the Torwali their right to information and renders their participation in the screening process ineffective.

Reprisals, Threats, and Intimidatory Practices

As the Torwali peacefully organized to defend their rights and requested the release of the screening, they faced escalating reprisals. Community leaders have been threatened, surveilled, and labeled as “foreign agents,” while women and families have experienced intimidation.

These developments have compelled the community to raise concerns with UN Special Procedures and international human rights bodies. No development process can be legitimate where communities face reprisal for exercising their rights.

Selective Withdrawal from Madyan Does not Resolve the Underlying Issues

The World Bank has now withdrawn financing for the Madyan Hydropower Project (MHPP) as part of the restructuring of KHRE. Publicly available information indicates that the restructuring followed significant financing and implementation difficulties, including a substantial financing gap, cost escalation, delays, and the redesign of Madyan following the 2022 floods. Project disbursements were reportedly only around four percent after more than five years of implementation.

This restructuring changes the Bank's financial relationship with the MHPP, but it does not resolve the underlying issues raised by the Torwali community. Most importantly, it does not resolve the status or outcome of the Indigenous Peoples screening process undertaken by the Bank itself.

The Bank remains engaged in the KHRE program and the Swat River basin, with the restructured program concentrating significant financing on Gabral-Kalam HPP and [retaining scope for further hydropower investments](#). The continuing program therefore remains relevant to the concerns raised by the Torwali and to the Bank's obligations under its environmental and social framework.

The restructuring of the KHRE must not become a means of closing the MHPP file without resolving the obligations arising from processes the Bank itself initiated. Withdrawal from the project financing does not retrospectively invalidate the Bank's due-diligence, consultation, or safeguards processes, nor does it eliminate the community's right to know the outcome of a screening process in which it participated. The Bank must therefore clarify whether and how the findings of that screening will inform its continuing engagement with the KHRE program and the Swat river basin.

Our Immediate Demands

We call on the World Bank to:

1. **Immediately release the Indigenous Peoples Screening Report undertaken for the Torwali people**, together with any associated findings, determinations, or recommendations, and clarify its status and relevance following the restructuring of the Khyber Pakhtunkhwa Hydropower and Renewable Energy Development Program (KHRE).
2. **State the Bank's determination regarding the recognition of the Torwali as an Indigenous People** and apply OP 4.10 / ESS7 in full for the KHRE Program.
3. **Ensure that no further steps are taken on the Madyan Hydropower Project** without a genuine FPIC process, whether as part of the KHRE Program or if the project is pursued separately by the Government of Khyber Pakhtunkhwa.

4. **Clarify publicly the status and implications of the Bank's withdrawal from Madyan Hydropower Project**, including assessments on any environmental and social risks identified and details on how the Bank's previous safeguards and due-diligence processes are being addressed following the restructuring.
5. **Guarantee protection against reprisals**, including clear consequences for any intimidation or threats linked to project engagement.
6. **Ensure that the continuing KHRE programme and related operations do not impact Indigenous communities** without full compliance with safeguard frameworks.
7. **Address the wider implications for future investment in the Swat hydropower corridor** by ensuring that the Bank's findings concerning Indigenous Peoples inform future financing and due diligence, including by domestic and international financiers, and that the Bank neither directly, indirectly, nor tacitly supports, facilitates, endorses, or enables projects that fail to recognize and protect affected Indigenous communities.

A Question of the Bank's Credibility

The Torwali people engaged with the World Bank in good faith, opening their homes, sharing their knowledge, and trusting in a process that promised fairness and recognition. Withholding the results of that process undermines both their rights and the institution's integrity. This is a clear violation of the right to access information and due process.

The Bank's withdrawal from financing Madyan makes transparency about the screening process more, not less, important. Whether the Bank will proceed with one particular project or another, the Bank owes the community that participated in a safeguards process initiated by the Bank access to the findings of that process, and a clear position on whether these findings will inform the Bank's continuing engagement in the Swat river basin.

We stand with the Torwali in demanding transparency, recognition, accountability, and protection from further harm.

Sincerely,

Darya-e-Swat Bachao Tehreek (Save River Swat Movement) and Indigenous Torwali Peoples Council

Endorsed by:

SN	Organization	Country
1	ACARO	Uzbekistan
2	ACSILs	Japan
3	Alliance of Solwara Warriors	Papua New Guinea
4	Alternative Law Collective	Pakistan
5	AMAN CHAPTER SUMBAWA	Indonesia
6	AMAN Maluku	Indonesia
7	Asia Indigenous Peoples Network on Extractive Industries and Energy (AIPNEE)	Philippines
8	Asia Pacific Network of Environmental Defenders (APNED)	Philippines
9	Asociación Fronteras Amazónicas - AFRONTA	Peru
10	Association Tunisienne de droit de développement	Tunisia
11	Bangladesh Krishok Federation	Bangladesh
12	Bir Duino-One World Kyrgyzstan	Kyrgyzstan

13	Cambodia Indigenous Peoples Organization (CIPO)	Cambodia
14	Center for Sustainable Community Development	Vietnam
15	Centre for Environment, Human Rights & Development Forum (CEHRDF)	Bangladesh
16	Climate Action and Energy Access Institute (CAEAI)	Pakistan
17	Climate Action Center (CAC)	Pakistan
18	Community Empowerment and Social Justice Network (CEMSOJ)	Nepal
19	Community Resource Centre (CRC)	Thailand
20	Congress of Nations and States	United States
21	Conservation Action Trust	India
22	Dawei Probono Lawyer Network	Myanmar
23	Defenders in Development Campaign	Philippines
24	ECOTON	Indonesia
25	Forum tunisien pour les droits économiques et sociaux	Tunisia
26	Friends of the Earth Sierra Leone	Sierra Leone
27	Green Advocates International	Liberia
28	Health Poverty Action (HPA)	United Kingdom
29	HomeNet Pakistan	Pakistan
30	Idara Baraye Taleem wa Taraqi (IBT)	Pakistan
31	Ilias Centre	Bangladesh
32	Indian Confederation of Indigenous and Tribal Peoples North East Zone	India
33	Indigenous Peoples Coordination Front India	India
34	Indigenous Women Legal Awareness Group (INWOLAG)	Nepal
35	Inisiasi Masyarakat Adat (IMA)	Indonesia
36	Institute for Indigenous Affairs and Development	Nepal
37	Jamaa Resource Initiatives	Kenya
38	Kapaeeng Foundation	Bangladesh
39	Kisumu Social Rights Association (KISORA)	Kenya
40	Krityanand UNESCO Club Jamshedpur	India
41	Ligue des sacrifices Volontaires pour la Défense des Droits de l'Homme et d'Environnement (LISVDHE)	Democratic Republic of the Congo
42	Limbu Thargat (Yakthun Sayang) Sahajikaran Samuha	Nepal
43	Link-AR Borneo (Institute for Research and Advocacy of Borneo)	Indonesia
44	Lok Sujag	Pakistan
45	Manushya Foundation	Thailand
46	MAP Foundation	Thailand
47	Miideekor Environmental Development Initiative (MEDI)	Nigeria
48	MOTHER CARE 4 HOPE OUTREACH (MOCAHO)	Cameroon
49	Mutasa Youth Forum & Community Empowerment Trust	Zimbabwe
50	National Campaign for Sustainable Development Nepal	Nepal
51	National Indigenous Women Forum (NIWF)	Nepal
52	Not1More	United Kingdom
53	Our Seas Our Future	New Zealand
54	Oyu Tolgoi Watch	Mongolia
55	Pakistan Fisherfolk Forum	Pakistan
56	Papuan Villager Foundation (YADUPA)	Indonesia
57	Partners in Development and Consultancy (PIDC)	Pakistan
58	PLUME National Indigenous Women's Rights Institute and Alliance	United States
59	POINT	Myanmar

60	Policy Research Institute for Equitable Development (PRIED)	Pakistan
61	Polish Institute for Human Rights and Business	Poland
62	POMANARA Youth Frontliners for Collective Actions	Indonesia
63	Recourse	Netherlands
64	Rivers & Rights	Thailand
65	Rivers without Boundaries	Kazakhstan
66	Rivers without Boundaries Mongolia	Mongolia
67	Sath-CSIDC	Pakistan
68	SERUNI	Indonesia
69	Sierra Leone Land Alliance	Sierra Leone
70	Society for Peace and Sustainable Development	Pakistan
71	Sustainability Watch (PPAB)	Indonesia
72	The Association of Indigenous Peoples Defender of The Archipelago (PPMAN)	Indonesia
73	The Knowledge Forum (TKF)	Pakistan
74	The William Gomes Podcast	United Kingdom
75	The Yarak	Pakistan
76	Torang Trust	Indonesia
77	Turkana Indigenous People action for Development (TIPD)	Kenya
78	UBINIG (Policy Research for Development Alternative)	Bangladesh
79	Umus	Bangladesh
80	Verrha Research	Pakistan
81	Youth Association for Development (YAD) Pakistan	Pakistan
82	Zo Indigenous Forum	India

Individual Endorsements:

SN	Name	Country
1	Aftab Ahmad	Pakistan
2	Aisha Malik	Pakistan
3	Alessandro Ramazzotti	Italy
4	Anna Belew	United States
5	Anne Lasimbang	Malaysia
6	Arpita Bhagat	India
7	Bineet J. Mundu	India
8	Darcy Allred	United States
9	Gabriela Maria Quijano	United Kingdom
10	Jane Lingbawan	Philippines
11	Kartini Promita Rosida Sianturi	Indonesia
12	Kirk Roger Person	Thailand
13	Monika Chaudhary	Nepal
14	Nhek Sarin	Cambodia
15	Peter Swift	United States
16	Rene E. Ofreneo	Philippines
17	Rhoda Dalang	Philippines
18	Safaa Ahmed Bilal	United States
19	Samra Shahid	Pakistan
20	Shujauddin Qureshi	Pakistan
21	Sidra Adil	Pakistan

22	Suanmoi Guite	India
23	Sumitra Manandhar Gurung	Nepal
24	Suresh Tamang	Nepal
25	Suroor Zahrah Ansari	Pakistan
26	Syed Jowdut Nadeem	Pakistan
27	Zia Ur Rehman	Pakistan
28	Zeenia Shaukat	Pakistan
29	Zung Ting	Myanmar