

WWF MANAGEMENT RESPONSE

TO RECOMMENDATIONS FROM INDEPENDENT PANEL REPORT

EMBEDDING HUMAN RIGHTS IN NATURE CONSERVATION: FROM INTENT TO ACTION

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CONTENTS

[Introduction](#)

[General Recommendations and WWF Responses](#)

1. [Integrate WWF's human rights commitments](#)
2. [Incorporate human rights commitments in WWF agreements with governments and other partners](#)
3. [Adopt and embed WWF's human rights commitments in relation to law enforcement](#)
4. [Increase WWF's institutional expertise and capacity on human rights compliance](#)
5. [Establish and implement human rights due diligence procedures](#)
6. [Ensure compliance with commitments relating to indigenous peoples and local communities](#)
7. [Establish effective complaints mechanisms](#)
8. [Be more transparent](#)
9. [Mainstream costs of effective human rights compliance into funding](#)
10. [Follow-up](#)

[Country-Level Recommendations and WWF Responses](#)

1. [Cameroon \(Boumba Bek, Nki, Lobéké national parks\)](#)
2. [Democratic Republic of the Congo \(Salonga National Park\)](#)
3. [Central African Republic \(Dzanga-Sangha protected areas\)](#)
4. [Republic of Congo \(Messok Dja\)](#)
5. [Nepal \(Chitwan National Park\)](#)
6. [India \(Kaziranga National Park\)](#)

[Abbreviations](#)

INTRODUCTION

In March 2019, WWF – World Wide Fund for Nature – commissioned an independent panel of experts¹ to review human rights allegations levelled at government park rangers in areas where we work in Cameroon, the Central African Republic, the Democratic Republic of the Congo, India, Nepal, and the Republic of Congo. WWF takes all allegations of human rights abuse seriously. The panel was asked to assess WWF’s role in connection with the allegations; to review WWF’s policies, governance, and quality assurance and risk management processes; to propose measures that WWF might take to strengthen human rights protections; and to advise on future approaches to field conservation. Our response is driven by concern for the welfare of those who live in these places. Our staff feel this strongly. Our staff also want to see those who violate the rights of communities – either directly or by illegally profiting from natural resources – brought to justice.

The panel sat for 19 months and, with the support of a review team, examined a large volume of documents and conducted numerous interviews. The panel also publicly invited submissions of information for consideration as part of the review.

WWF appreciates the panel's commitment and diligence in conducting their review, particularly in the face of challenges caused by the COVID-19 pandemic. WWF also acknowledges the contribution of current and former staff who provided full access to all requested documentation, readily responded to enquiries, and otherwise cooperated to ensure the panel and review team could conduct a full and thorough analysis.

WWF is making the panel’s report readily available to the public. The panel has made a total of 50 general recommendations covering WWF’s work and an additional 29 specific actions relating to country-level programmes where human rights allegations have been made. WWF welcomes the recommendations as an opportunity to listen, learn, and act to better safeguard the rights of the communities with whom we work. [Section 2: General Recommendations and WWF Responses](#) and [Section 3: Country-Level Recommendations and WWF Responses](#) of this document provide details on how we will address each recommendation.

WWF management actions

Our efforts to help address social issues and drive a rights-based development agenda have been more successful in some places than others: more challenging when there is conflict, weak governance, and weak rule of law. Notwithstanding our principles, policies, and best efforts to support local conservation and development, we recognize that allegations of human rights abuses have been made against rangers and other third parties not under WWF’s direct control. These allegations were raised in some of the most conflict-affected and insecure places where we work. The reported atrocities go against all the values for which we stand. Human rights abuses are never acceptable, and we feel great sorrow and sympathy for the people who have suffered.

The panel report provided valued foundational advice on how to strengthen human rights in conservation in fragile and conflict-affected places. This advice is pertinent to the entire conservation community. While the panel conducted its review, we also conducted our own internal assessments and designed, and started to implement, new governance frameworks, risk management systems, and accountability mechanisms. With the panel’s advice now to hand, we will continue this process, and specifically:

- 1) Strengthen practices and consistency of implementation in field operations;
- 2) Seek to leverage greater influence over third parties with whom WWF partners or relies;
- 3) Take additional steps to reduce conflicts between communities and government rangers;
- 4) Strengthen follow-through on commitments, risk management, and oversight at WWF Network level.

¹ The panel was chaired by Judge Navi Pillay, former United Nations High Commissioner for Human Rights, and supported by Professor John Knox, the first United Nations Special Rapporteur on human rights and the environment, and Dr Kathy MacKinnon, Chair of the IUCN World Commission on Protected Areas.

1) Field implementation

WWF is proud of its community-based natural resource management work and remains committed to the impact and sustainability of its work in this area. In addition, we have taken measures to enhance our safeguards by operationalizing a comprehensive Environmental and Social Safeguards Framework (ESSF) across the entire network. We explored a range of options for addressing human rights concerns in our portfolio of field conservation projects and, ultimately, determined that a safeguards framework was the most effective way to achieve concrete results as it provides both a comprehensive policy framework and a means of implementation, thus linking policy to field practice. WWF's International Board and network governance bodies approved the institutionalization of this framework in July 2019, and then all 35 boards of WWF's constituent members approved its adoption. The framework borrows from systems applied in multilateral and bilateral development organizations. The Panel's recommendations will strengthen this system.

The ESSF is underpinned by two new offices:

1. WWF International Safeguards office, led by [the director of Environmental & Social \(E&S\) safeguards and policies](#) and staffed by a dedicated team, provides the foundational support, training, sensitization and cohesion for the implementation of safeguards across the network. Following the Panel's recommendations, the office will also oversee our network-wide community of social policy experts,² and will report publicly on the status of safeguards implementation and of human rights commitments that WWF has made through its policies. This office is in place and staffed, led by a director who brings over two decades of experience managing safeguards for the World Bank Group's International Finance Corporation.
2. The independent Office of the Ombudsperson, which will report directly to the WWF International Board, will perform dispute resolution, compliance assessment, and advisory functions. WWF is the first conservation organization to create such a position. Once in post, the ombudsperson will develop standard operating procedures for case file management and disclosure, and lead dispute resolution based on good international practices.

The safeguards framework is being implemented. All 7,500 WWF staff across the network have completed a safeguards training course and we have launched the safeguards process in landscapes and seascapes worldwide. By adopting this safeguards framework, WWF is:

- Surfacing social and environmental programme risks using common screening tools that help ensure comparability, using targeted assessments that are now mandatory across all offices;
- Implementing mitigation plans to address these risks using common guidance and tools;
- Establishing grievance mechanisms through which those affected by WWF's projects can raise their concerns and seek resolution, including an option directly administered by the Office of the Ombudsperson;
- Clearly assigning accountability for safeguards to the CEO or country director of each office, with mechanisms in place to ensure compliance and consistency in implementation.

A new network Conservation Quality Committee (CQC) has been established to review, advise on, and signoff on high-risk interventions, based on the proposed safeguard risk mitigation measures. The CQC also guides the development of relevant guidance and standards for the network. The CQC reports into the Network Executive Team (NET)³ on a regular basis and escalates cases where NET approval is required because of the nature of the risk and/or where a precedent may be set. To ensure the necessary expertise,

² The Social Development for Conservation (SD4C) community includes over 60 members from across the network.

³ WWF's highest executive body chaired by the director general of WWF International and comprising CEOs of a representative sample of WWF offices.

diversity of views, and representation, CQC members are highly experienced conservation directors and CEOs drawn from all regions where WWF operates.

WWF's safeguards framework, like all safeguards systems, is living and adaptive. We will continuously evolve it to meet international good practices. To this end, WWF will open its safeguards framework for a public consultation process in early 2021.

2) Third-party compliance

Under UN protocols, the responsibility for human rights rests with governments. WWF is committed to using our agency to influence realities on the ground. Where WWF has influence to prevent or mitigate harm, we will more systemically exercise it. WWF also recognizes that, if acting alone, we may lack adequate leverage to influence many governments regarding human rights impacts and we recognize our duty to assure the safety of our staff, particularly those who work in the field. To this end, we undertook a comprehensive set of consultations with human rights organizations and received guidance on how to best address these systemic challenges in a concerted way. The feedback was that in some countries the exercise of agency is a challenge for everyone, necessitating constructive cooperation between the development, human rights, and conservation organizations present in-country.

WWF will clearly convey to governments and other partners its human rights commitments and codify them in funding agreements. Due diligence screening of potential partners and any subsequent negotiation and contracting will be clear about the ability to implement WWF's requirements and commitments. Project funding agreements and similar templates will reflect this.

When negotiating MOUs with governments in countries where the contextual risks are considered high, or the subsequent negotiation of agreement terms leaves WWF with a material residual risk on a human rights or other safeguards issue, the final proposed terms of the agreement will be escalated for approval by the CQC or WWF International Board. Through this process of specify-negotiate-escalate-approve, we ensure consistency of approach.

Beyond strengthening compliance controls with partners, we will seek to mediate conflicts and facilitate a process, should parties agree, whereby grievances can be redressed. Such mediation will be the responsibility of the ombudsperson. The terms of reference for this position reflect good international practices within the ombudsperson community, with a strong focus on dispute resolution. It is critical to take this approach given that many disputes are rooted in deep-seated historical, cultural and other issues, often related to resource access.

3) Government rangers

The challenges confronted in the arena of law enforcement, particularly efforts in fragile states with weak governments, are not unique to WWF but common to conservation at large. We recognize that this needs to be addressed systemically. WWF has entered a partnership with eight international organizations to create the Universal Ranger Support Alliance (URSA).⁴ URSA is committed to advancing the professionalization of rangers globally through the institution of codes of conduct, improved field management systems, and training. WWF is also strengthening due diligence measures in designing and supporting enforcement programmes. Enforcement programmes need to be designed with local communities and affected stakeholders to assure success and to de-risk field operations, particularly in violence-afflicted areas where the lives of rangers and local communities are at risk as a result of insecurity. A key focus must be on ensuring that government and other third-party ranger bodies are able to exercise their duties lawfully, with restraint, and to the highest ethical standards.

⁴ URSA's founding members are Fauna & Flora International, Force for Nature, Global Wildlife Conservation, the International Ranger Federation, Panthera, the IUCN World Commission on Protected Areas, WWF and the Zoological Society of London.

4) WWF Network governance

WWF operates across 100 countries as a federated network in which every office is bound together by a common mission, brand, programme strategy, priorities, and a set of policies and safeguards. This combination of local and global presence confers several advantages. WWF can be locally attuned and relevant, while also being able to engage in global initiatives to address complex issues like the conservation of nature, climate change, and the production of food. It also allows us to mobilize the public to engage in our mission. Distributed leadership, combined with connected global governance, represents the strength of WWF's network. A federated network structure also brings challenges. Operating across diverse countries that range from Suriname to Russia, every office carries the responsibility to be consistent and strong in fulfilling our mission and adhering to policies and safeguards.

Through the lens of individual landscapes and our global presence, the panel highlights several challenges related to WWF's governance structure and to the way it manages its offices. More specifically, the panel emphasizes a lack of clarity in our network with regard to risk management, with unclear roles for various entities in terms of evaluation, judgment, accountability, monitoring, and implementation.⁵ The panel also addresses the need to strengthen our management, capacity, and oversight of the programme offices in Africa, particularly in managing risky undertakings, grievance mechanisms, transparency, and accountability.

Over the past year, WWF has put in place specific measures and changes that strengthen accountability with regard to the aforementioned issues. In particular, we have:

- Updated our unifying set of values and associated operating standards for the network;
- Increased transparency within the network and for external stakeholders. We have committed to routine disclosure of safeguard-related information, including mitigation frameworks for each landscape/seascape where we work;
- Strengthened our compliance mechanisms with stepwise measures to hold each office accountable for delivering on our values, policies, and safeguards throughout the network;
- Clarified and strengthened the roles of network committees that are responsible for governance, policy, and risk management. This is intended to ensure that we are more systematically evaluating programmatic risks, adjusting our approach when grievances are filed, and making sure that we track and respond to complaints.

Follow-up review

WWF is committed to these reforms and others detailed in this response, and we will undertake a review of outcomes and approach through the office of the ombudsperson in three years. The WWF International Board and NET will monitor progress and implementation and take appropriate measures to ensure activities are resourced and managed to achieve the desired outcomes.

WWF recognizes that conservation and human rights issues are at the heart of sustainable development. These are interconnected issues and need to be addressed together. Advancing inclusive conservation approaches that respond to sustainable development imperatives and foster better futures for people and nature will require partnerships, creativity, taking informed risks, candidly reviewing outcomes and sharing lessons learned. WWF does not work in isolation, nor do we want to shy away from the areas of greatest collective challenge. We are committed to learning and sharing our lessons over the journey ahead with others in the environmental sector.

⁵ To be precise: evaluating whether we should do a project in the first place, based on clear criteria that balance the need to do it, the risks involved, and the ability to meet our required ESSF standards; monitoring whether we are doing what we need to do per our safeguards and taking quick and effective action where necessary if issues arise.

SECTION 2: GENERAL RECOMMENDATIONS AND WWF RESPONSES

Recommendation 1:

Integrate WWF's human rights commitments.

a. WWF should integrate all of its human rights commitments into a single, easily accessible document. WWF's stated commitments to human rights are generally strong, but they have been adopted in different social policies at different times, in different formats. The proliferation of statements makes it difficult for WWF staff, partners and others to understand exactly what WWF's human rights commitments are.

The new document would not supersede all existing social policies, many of which do more than state human rights commitments, and it should certainly not weaken any of WWF's current commitments. The Conservation and Human Rights Framework could provide a starting point. Annexes could set out WWF's detailed commitments on specific topics, including on indigenous peoples and local communities, and on rangers and law enforcement. The new statement should reflect the current state of human rights norms and best practices, including the UN Guiding Principles on Business and Human Rights.

b. The new Environmental and Social Safeguards Framework (ESSF) may provide an opportunity to integrate WWF's human rights commitments into one document, but the current version of the ESSF does not do so. Whether or not WWF chooses to use the ESSF as the means of integrating its human rights commitments, the final version of the ESSF should explicitly reflect and be fully consistent with those commitments.

The ESSF and the WWF social policies will be subject to a public consultation in early 2021. WWF will use this opportunity to act on the panel's recommendation to integrate all of WWF's human rights commitments into a single document. WWF views consultation as a critical validation step for its human rights and other Environmental & Social (E&S) safeguard commitments. The ESSF and social policies (including integrated human rights framework) will be revised post-consultation and submitted to the International Board for approval in mid- to late- 2021.

The [social policies are already publicly accessible](#) via panda.org, as is the E&S safeguards [framework summary \("Network Implementation Arrangements"\)](#). The 10 supporting E&S Safeguard Standards are approved for internal use, but we are making them [publicly available as support materials to this response](#). As described in the previous paragraph, they will undergo a formal public consultation in early 2021. Once subsequently approved by the International Board, revised versions will be made publicly accessible through panda.org.

As the panel observes, the scope of social policies and E&S safeguards extends beyond human rights. Their application also differs. The social policies apply to all WWF work, whereas the ESSF is designed specifically to address field operations. The social policies will maintain their identity and purpose but WWF concurs with the panel that there must be consistency between them and the ESSF.

In designing the ESSF, an analysis of social policy commitments and the [UN Guiding Principles on Business and Human Rights](#) was undertaken to inform content. Beyond that, the ESSF was also designed to provide frameworks for implementation, compliance monitoring, and mediating conflicts. WWF will seek feedback on this approach through the public consultation process.

We acknowledge the potential of the [Conservation Initiative on Human Rights \(CIHR\)](#), of which WWF was a founder member. Through it and other routes, WWF stays engaged in and informed of the development of

human rights norms and good practices. To assist with the application of human rights commitments, particularly in complex or other high-risk scenarios, WWF will establish a human rights advisory group, as described in [4b](#).

Finally, and as chapter 3 of the panel report directs, WWF must always understand its relationship to a human rights issue and the degree of leverage and influence it holds. Our degree of influence will be considered in the finalization of policy commitments so that WWF does not commit to obligations that it is unable to apply or comply with (e.g. commitments that can only be upheld by nation states, or accountabilities that are outside WWF's area of influence). The ombudsperson, when in post, will provide guidance on this matter and advise the International Board on whether modifications to policy are required.

c. In the process of developing a new integrated statement on human rights, WWF should consult widely and take into account the views of a wide range of its partners and stakeholders, including representatives of indigenous peoples and local communities, and the experience of other conservation organisations working in similar situations.

Forthcoming public consultation

During the process of designing and implementing the ESSF, WWF has engaged peer conservation NGOs, donor government partners, academics working at the intersection of human rights and conservation, and bilateral and multilateral institutions with similar safeguards systems.

We acknowledge the panel's recommendation to undertake a broad and meaningful public consultation process. Listening and learning are embedded in our institutional values and behaviours.

As described in the response to [1a](#), the ESSF and the WWF social policies will be subject to a public consultation in early 2021. The consultation approach paper was approved by the CQC in September 2020. The CQC reviews, advises on, and signs off on high-risk projects or landscapes in WWF offices where escalation criteria have been met due to environmental and social safeguards categorization, overall risk assessment, or due diligence of partners. The CQC also informs the development of relevant guidance and standards. The CQC reports into the NET on a regular basis and escalates cases where NET approval is required because of the nature of the risks, or where precedents may be set. CQC members are highly experienced conservation directors and CEOs from all regions where WWF operates, to provide for a diversity of views and representation.

The principal objectives of the public consultation are to validate the core ESSF architecture and to determine specifically:

- Whether it aligns with expectations on WWF's role, remit, values and ways of working;
- Whether it aligns with global benchmarks and good practice expectations for safeguard frameworks, including human rights coverage.

COVID-19 is likely to limit (or entirely prevent) the opportunity for townhall style or other face-to-face forums, but through virtual forums and the consultation portal on [panda.org](#), we will work to extend the consultation outreach as widely as possible. We accept that some stakeholders will be more interested in this process than others, but it will be designed to be inclusive.

The public consultation will be led and managed by WWF International, but it will be a shared effort across the network. COVID-19 restrictions permitting, national and local offices will look to engage stakeholders who do not have easy access to virtual or web-based tools. At the end of the consultation period, the documents will be revised, submitted to the NET and WWF International Board for approval, and then posted on [panda.org](#).

The consultation will benefit from the 15-month period of E&S safeguards implementation to date. In the summer of 2019, WWF moved quickly to operationalize the ESSF in order to facilitate screening of priority landscapes and identify gaps. WWF also recognized that rapid application of the E&S safeguards and implementation support tools would provide valuable feedback from staff, communities, partners, and other stakeholders. The COVID-19 pandemic has limited aspects of community engagement and public consultation during this period, but nonetheless, the final version of the ESSF will benefit from lessons learned during this time.

Recent consultations

WWF International and WWF-US, in their respective “home office” roles for over 40 offices, have led on recent consultations on behalf of the network.

A Global Dialogues programme, managed by WWF International, has engaged 40 diverse thought leaders from a broad range of constituencies across three thematic sessions since June 2020:

1. A rights-based approach to planetary and human health – balancing individual, collective, and nature rights;
2. Nature conservation and socio-economic impacts on communities – exploring benefits and challenges;
3. Nature conservation by communities – exploring inclusive conservation in practice.

The dialogues were guided by Chatham House Rules to facilitate full and frank debate. A summary of key observations arising from the dialogues will be posted on panda.org and inform the public consultation for the ESSF and social policies.

In late 2019, WWF-US approached a range of international development and human rights organizations to discuss and solicit feedback on WWF’s conservation strategy, and perceived good international inclusive conservation practices. Fourteen US-based organizations participated in the consultation, including those experienced in working on the ground in complicated social contexts; those advocating for high standards on human rights; and those who do technical work on safeguards systems.

d. The integrated statement of WWF’s human rights commitments should be adopted formally by the International Board.

Please refer to the response to [1a](#) above. Following its initial approval in August 2019 a revised version of the ESSF, informed by the public consultation process, will be submitted to the International Board for approval. Once approved (in mid- to late-2021), the boards of every WWF national organization will also be requested to formally adopt it, as occurred after the initial August 2019 approval when every national organization duly complied (100% fulfilment).

e. WWF should make the final statement public and easily accessible and disseminate it internally and externally to its own staff, its partners, and other stakeholders, including the indigenous peoples and local communities in the areas in which it works.

Current versions of the ESSF, including the 10 underlying standards will be shared publicly as part of the consultation process. The subsequently revised and approved ESSF (and social policies) will be posted on panda.org (i.e. made fully accessible to the public). National organizations are also likely to include links from their websites to the panda.org site and therefore amplify its accessibility. WWF staff will have access through panda.org and internal sites, with the ESSF team in WWF International maintaining oversight to ensure version control.

E&S Safeguard Standards 2 on *Disclosure* and 3 on *Community Stakeholder Engagement* set baseline expectations for how WWF will have open, inclusive dialogue with Indigenous Peoples and Local Communities (IPLCs). This includes communication of WWF human rights commitments and, additionally, how individuals or communities can raise concerns via access to grievance mechanisms (as specified in E&S Safeguard Standard 4). Such an approach is not new to WWF, with many staff spending a majority of their time on IPLC engagement and support. However, we accept the panel's finding that our approach has not been sufficiently consistent, and we have taken measures to rectify this through the ESSF and other measures described in this document.

Due diligence screening of potential partners and any subsequent negotiation and contracting will include E&S safeguard requirements. Project funding agreements and similar templates will be amended to reflect this.

f. WWF should ensure that its human rights commitments are embedded throughout the Network. Several of the Panel's other recommendations are directed at ensuring that WWF has the institutional expertise and mechanisms necessary to implement its commitments. The WWF International Board and WWF International have responsibility for providing clear guidance throughout the Network on how to implement and monitor the commitments.

Embedding human rights

Our role in contributing to human rights is seen without question as part of our institutional fabric. The ESSF requires the integration of human rights considerations into WWF's programmatic activities and the design of future programmes. This effort, by necessity and design, connects WWF's landscape/seascape teams with established and vetted safeguards experts and other practitioners across the network. The subsequent collaboration brings the right skills, experiences, and backgrounds together at the planning and design stages to ensure that E&S safeguard and social policy commitments, including those on human rights, are understood and incorporated. For programmatic activities considered to be high risk, new oversight and approval processes have been introduced (e.g. the CQC) and independent experts must be engaged in the analysis and development of mitigation plans.

The operational effectiveness of the ESSF will be monitored and routinely reviewed by the director of E&S safeguards and policies and other accountable WWF managers. International Board-level oversight will be led by the Audit, Risk and Compliance Committee (ARCC). Once recruited, the ombudsperson will take direct interest in this matter and advise the International Board on whether modifications are required.

Institutional expertise

The Safeguards Team in WWF International was established in late 2019 and has a current staff count of eight, including two Regional Head positions in Africa and Asia. Among other responsibilities, the team is tasked with expanding WWF's capacity through training of staff and accrediting a cadre of safeguards practitioners across the network. WWF-US, as home office for 13 countries, also has a team of seven.

Over the course of ESSF roll out, several offices have hired their own additional safeguards implementation staff. All staff who work full or majority time on safeguard and social policy issues are part of the E&S Safeguards Practitioners Group, which currently has 41 members. Chaired by the director of E&S safeguards and policies, the group works by providing peer-to-peer support, raising and resolving issues on E&S safeguards interpretation, and drafting and peer reviewing implementation tools and guidance.

A foundational training course, *Making Sense of Safeguards*, was introduced in April 2020. This has been completed by 7,500 staff and board members across the network. The course is a mandatory component of the onboarding process for new staff hired across the network.

The Walk the Talk - Human Rights in Conservation Exchange training course was launched in July 2019 with a focus on social policy principles and the integration of human rights approaches into conservation action. Enrolment is aimed at those staff most likely to encounter these issues in their work, with almost 2,000 participating in one or more sessions, and nearly 1,000 completing the entire curriculum. A follow-up exchange is being considered for 2021.

Recommendation 2:

Incorporate human rights commitments in WWF's agreements with governments and other partners.

a. WWF should include clear statements of its human rights commitments in all of its country and management agreements with governments and other partners. The language should be consistent across all of the agreements. Agreements that provide for, or could provide a basis for, engagement in specific sites should also include provisions relevant to those areas.

b. WWF should evaluate all of its existing agreements with governments and, where possible, amend them to include language reflecting its human rights commitments. All new and renewed country agreements should include appropriate language on human rights commitments.

c. WWF should ensure that the respective roles and responsibilities of WWF and its partners are clearly set out in their agreements. Titles should reflect actual responsibilities and authority. For example, WWF staff should not be described as directors of parks if they do not have full authority to employ and supervise park staff.

As described in the response to [1e](#), WWF will include ESSF and social policy commitments in negotiations and contracts with governments and other partners in area-based programmes, and our templates are being amended to reflect this and promote consistency. Where human rights risks have been identified – especially those involving law enforcement, restriction of access, and potential impacts on indigenous communities – WWF will assess the operational context, including:

1. The host country legal framework, including access to justice;
2. WWF's role and degree of influence and leverage;
3. Past experience with, or public information on, the commitment and capacity of the partner(s) to address the issues captured in the ESSF.

Through this approach, WWF will determine the risk profile of the proposed agreement, escalate in accordance with the Network Standard on Risk and Quality Assurance,⁶ and structure and negotiate agreements to mitigate risks accordingly. New agreements for several landscapes are currently being assessed in line with these principles, including Salonga National Park in the Democratic Republic of the Congo.

If an agreement with a government or partner is approved to proceed, WWF will include the relevant E&S safeguard provisions, inclusive of our human rights commitments, within it. In landscapes where the contextual risks are considered high, or the subsequent negotiation of agreement terms leaves WWF with a material residual risk on a human rights or other safeguard issue, the final proposed terms of the agreement will be escalated for approval (CQC or WWF International Board). Through this process of specify-negotiate-escalate-approve, WWF will ensure consistency of approach.

⁶ The Risk and QA Standard defines the risk management and quality assurance principles, and escalation protocols for high risks, for all WWF Offices to apply, and sets out our Risk Appetite Statement which is the level of risk we are prepared to take in pursuit of our mission. The standard provides guidance for offices on common risk management language and processes, and roles and responsibilities, so that we have a consistent and robust network-wide approach to managing risks to our mission and the people in the landscapes where we work (which is where the ESSF applies).

With respect to high-risk landscapes where agreements already exist, WWF will send each of its partners an affirmative statement reflecting WWF's support for, and voluntary commitments to, human rights and request acknowledgement. Funding replenishments will be subject to the agreement process outlined above.

WWF also acknowledges the recommendation regarding clarity of roles and titles for WWF staff and will seek to reflect this. WWF roles, responsibilities, and accountabilities will be clearly defined in any new agreement (and likewise for other partners subject to that agreement).

Recommendation 3:

Adopt and embed WWF's human rights commitments in relation to law enforcement.

Agreements with governments contemplating support for law enforcement should reflect WWF's commitments and conditions regarding such support and clearly set out the corresponding commitments of the government.

a. WWF should adopt detailed human rights commitments in relation to law enforcement and anti-poaching activities.

e. When providing support for law enforcement activities in protected areas, WWF should ensure that there are effective systems of monitoring and enforcing human rights standards in place, including due diligence procedures for hiring, training and disciplining rangers.

h. WWF should continue to support international efforts to improve standards, training and welfare for rangers, including through its partnership in the Universal Ranger Support Alliance.

WWF developed overarching Principles on Enforcement and Rangers, which were approved as part of the [E&S Safeguard Standard 7 on Community Health, Safety and Security](#). We are grateful for the panel's acknowledgment of this as a good starting point for specifying WWF's human rights commitments in relation to law enforcement. The standard addresses community well-being by urging protection for people against physical violence, gender-based violence, and other abuses. The principles and supporting tools help us to determine whether the authorities responsible for enforcement have the requisite management systems in place – covering all aspects of human resource management. They further identify the conditions required for the lawful duty of rangers to be exercised with restraint and fulfilled to the highest ethical standards in order to protect human rights.

The principles cover accountability; building ranger capacity; identifying, monitoring, and planning for challenges; and sanctions for malfeasance. Measures for failing to meet the standard or the principles include withholding funds if human rights violations occur and are not remedied, as well as terminating support. To guide implementation of these Principles, WWF is also piloting a due diligence tool to establish whether the necessary conditions are in place where support is rendered for law enforcement and to guide mitigation measures to address inadequacies, promote accountability, and build ranger capacity. The tool was drafted with the assistance of institutions with field experience addressing human rights in law enforcement operations and protected areas. The tool will be pilot tested, revised, and formalized by end 2021.

WWF has also formed partnerships to advance implementation. For example, WWF has signed an MOU with URSA, a coalition of eight international NGOs⁷ committed to advancing the professionalization and standards of rangers globally. The initial work plan adopts a strong rights-based approach across five themes:

1. Advocacy and representation
2. Ranger capacity
3. Employment and welfare
4. Equality and stewardship
5. Ethics and standards

WWF will collaborate with URSA partners to deliver the work plan, including strengthening the due diligence tool for application beyond WWF's work. In doing so, WWF and partners will commit to consulting with development and human rights agencies, including IPLC groups to ensure a broad set of viewpoints are heard.

WWF will include obligations in funding agreements for partners – including governments – to uphold the Principles on Enforcement and Rangers. Implementation of mitigation measures to address identified risks will therefore be a contractual obligation.

b. The commitments in relation to law enforcement and rangers should include the codification of WWF's prohibition on funding purchases of firearms, and its standards in relation to informants that are currently addressed in the manual developed with TRAFFIC and published in 2019.

WWF has established an exclusion against the purchase of firearms for law enforcement as part of the [ESSF](#) (page 14). This is binding on all WWF offices and has been codified in the [Principles on Enforcement and Rangers](#) (see response immediately above).

WWF is developing guidance on working with informants in order to protect their safety as well as the safety and rights of local communities as part of the law enforcement due diligence tool.

c. Agreements between WWF and governments should establish human rights standards for rangers and other law enforcement agents that are at least as stringent as international norms...

WWF acknowledges the panel's recommendation and confirms that "international norms" act as our benchmark.

The development of the Principles on Enforcement and Rangers drew on the UN Code of Conduct for Law Enforcement Officials and the UN Basic Principles on Use of Force and Firearms by Law Enforcement Officials. Institutions carrying out conservation law enforcement with WWF funding or technical assistance must commit to using force ethically, with restraint, to the minimum extent necessary, and assure that law enforcement personnel do not commit human rights abuses. WWF recognizes that, in many countries, such work will require the exercise of considerable agency, which is most effectively achieved by working in a consortium of conservation, human rights, and bilateral and multilateral agencies.

WWF further requires commitments that partners have "the mandate to take appropriate measures to meet WWF's standards and the ability to ensure that rangers receive the necessary training and evaluation to

⁷ URSA's founding members are Fauna & Flora International, Force for Nature, Global Wildlife Conservation, the International Ranger Federation, Panthera, the IUCN World Commission on Protected Areas, WWF and the Zoological Society of London.

uphold human rights". WWF specifies that such training must include information on applicable regulations under national and international laws as well as international good practices.

While WWF has spent time and resources on codifying its law enforcement safeguards, we recognize our need to enhance internal capacity. In 2021, we will recruit competent technical expertise to oversee and guide operationalization across the network.

d. WWF should develop a standard code of conduct for rangers, which should be consistent across all WWF programmes. WWF support to rangers should be tied to compliance with the code of conduct. The code of conduct should be public and disseminated to indigenous peoples and local communities in their own languages.

WWF has a strong code of conduct governing its staff (specifically a statement of the organization's mission, values, and principles, linked with standards for conduct). However, this code of conduct does not apply to rangers as they are not WWF staff. As WWF developed [the Principles on Enforcement and Rangers](#), it became apparent that few protected area authorities have codes of conduct for ranger staff that adequately address human rights issues. WWF therefore recognizes the imperative for rangers to have clear strong codes of conduct governing their activities and that such codes need to be supported by standard operating procedures and human resource management systems.

Working with partners in URSA and following consultations with IPLC groups and other stakeholders, WWF is developing a reference global code of conduct that may be drawn upon by relevant authorities to strengthen their management systems and ranger accountability. The target date to finalize this is mid-2021. URSA has already developed a global definition of the term "ranger", as well as draft job descriptions that will, in turn, frame the code of conduct. It has also undertaken a benchmark review, focused on codes of conduct, ethics codes, and accompanying laws and policies in over 40 countries.⁸

The panel's recommendation that any code of conduct should be made available in multiple languages and made accessible to IPLCs is acknowledged and will be raised with URSA partners.

f. Training should be provided regularly to educate protected area officials, rangers and other law enforcement agents on the code of conduct and relevant domestic and international standards. Training should include education and capacity building with regard to interactions with indigenous peoples and local communities. WWF should offer such training to new recruits, with refresher training on a regular basis thereafter. Training on these topics should also be offered, as appropriate, to senior government officials and the judiciary.

WWF agrees that regular training will be imperative to implement safeguards that specify that ranger-led law enforcement upholds human rights protections. Training needs will be determined as part of mitigation measures to reduce risks where WWF provides support to law enforcement. WWF has already developed several training modules addressing this need. For example, WWF has developed curricula and training programmes for ecoguards in Cameroon, the Central African Republic, Gabon and the Republic of Congo. Training is underway in Salonga National Park, Democratic Republic of the Congo, performed by a competent contractor with strong experience.

WWF has also collaborated with 14 other organizations to develop training guidelines for field rangers on behalf of the [International Ranger Federation](#) and its partners. It is based on current knowledge and good practices drawn from the global experience within the participating organizations' networks and beyond.

⁸ 14 in Africa, 12 in Asia-Pacific, two in Europe, 14 in Latin America and two in North America.

Modules cover human rights, use of force, community collaboration, and arrest procedures. Training includes:

- Human rights definitions, how they are established, and how they apply in the ranger's workplace;
- Categories and characteristics of human rights;
- Approaches and guidelines relating to human rights, as outlined under the International Bill of Human Rights;
- The Universal Declaration of Human Rights and the United Nations Code of Conduct for Law Enforcement Officers;
- The importance of human rights and humane conduct;
- The regulations pertaining to torture, cruel and degrading behaviour, and detention;
- Dealing with women, children, and the elderly;
- The procedures for reporting a human rights violation.

WWF acknowledges that training on these topics will need to be provided to the judiciary and senior government officials. Such training is an undertaking that WWF recognizes will need to be discharged with and indeed led by other partners with the requisite experience in fostering good governance and access to justice, particularly the human rights community. Moreover, the training will need to be expanded to cover the judiciary and senior officials. For reference, we will learn from trainings already conducted with judiciary and senior officials in Cameroon, which included a human rights module.

g. WWF should monitor and report on compliance by rangers and other law enforcement agents in sites to which WWF provides support. In addition to setting up complaint mechanisms, WWF should also regularly consult with indigenous peoples and local communities and take other appropriate proactive steps, such as spot checks on patrols.

WWF is implementing [E&S Safeguard Standard 4 on Grievance Mechanisms](#), which specifies the requirements to establish, promote, capture, address, escalate, monitor, and seek to resolve complaints and other reports from communities. Additionally, the ESSF requires ongoing consultation with communities through regular engagement and outreach.

Measures for ensuring compliance with E&S Safeguard mitigation plans are tailored to local needs and circumstances, including the likelihood of non-compliance. Although spot checks are unlikely to be workable in remote locations, WWF will promote the use of [Spatial Monitoring and Reporting Tool \(SMART\)](#), designed to help monitor ranger activities on the ground. Nine international NGOs belong to the official SMART Partnership,⁹ and the technology is estimated to be in operation at 1,000 sites globally across 60 countries. Fourteen of these countries have adopted the tool nationally as their primary method of monitoring activities within their protected conservation areas. SMART is deployed in 255 landscapes in over 30 countries where WWF is active.

The tool can provide information on where patrols have been conducted, their duration, which staff were involved, whether community members joined the patrols, whether any community members were encountered on patrols, and the enforcement actions taken in the field (e.g. warning letters, arrests and/or identification of illegal activities). This gives SMART an unrivalled capability to bring accountability to patrolling and law enforcement activities at the sites in which it is deployed.

In addition to SMART, we seek to learn from control rooms, where real-time control and communication (via SMS, messages, pictures) with ranger field patrols is possible. In the Central African Republic's Dzanga-Sangha landscape, such a system is already in operation.

⁹ Frankfurt Zoological Society, Global Wildlife Conservation, North Carolina Zoo, Panthera, Peace Parks Foundation, Wildlife Conservation Society, Wildlife Protection Solutions, WWF, and the Zoological Society of London.

Recommendation 4:

Increase WWF's institutional expertise and capacity on human rights compliance.

a. The International Board should review its membership and ensure that at least one member is a representative of indigenous peoples, and at least one member has expertise in human rights.

The WWF International Board includes a highly recognized expert on human rights and access to justice. However, WWF acknowledges that the board regulations do not currently require inclusion of a member with the said expertise. The matter will be reviewed by the WWF International Board with a view to strengthening board oversight of safeguards and other human rights commitments.

WWF also seeks to increase representation of indigenous peoples. In early 2020, the chairperson of the WWF International Board requested that the Nominations Committee consider the recruitment of an indigenous peoples' representative to the board, or to propose alternative ways to ensure adequate representation. At the request of the chair of the Nominations Committee, the Governance Practice leader consulted with indigenous peoples' representatives (with whom WWF has relationships through its People Protecting Landscapes and Seascapes Initiative). WWF concluded from its review of the consultation outcomes that a single voice/representative at board level would have little traction with communities, given that they are not monolithic and their issues differ radically from place to place and country to country. Instead, the recommended approach was to establish an advisory group to be a regular resource to the Safeguards, Governance Practice and Ombudsperson functions, promoting operational practices focused on meaningful engagement, recognition of rights and delivery of practical outcomes in critical landscapes (e.g. on access rights and benefits sharing), and regularly bring the voices of IPs into WWF's global governance so that WWF can act on their experience and knowledge, and better honour their voices.

b. WWF International should appoint a Director of Human Rights Commitments and Compliance (HRCC), who would be part of the Senior Management Team and report directly to the Director General. This person should have appropriate experience and expertise in human rights and be on the Conservation Quality Committee. This position would oversee and be supported by the office identified or established by WWF International as the appropriate office to hold day-to-day responsibility for coordinating, promoting and supporting implementation of WWF's human rights commitments.

The position of director of Human Rights Commitments and Compliance (HRCC) will be filled by the director of E&S safeguards and policies, whose job description will be revised to address the panel's recommendation to be on the CQC. As E&S safeguards and human rights underpin conservation strategy, planning, implementation, and outcomes, the position will continue to report into the global conservation director but will routinely brief the Senior Management Team and ARCC.

To support this expansion of role, the director will, by the end of March 2021, establish a human rights advisory group comprised of external experts, in order to advise her/him on specific human rights positions or interpretations and to verify that WWF practices are aligned with internationally recognized good practice.

The director of E&S safeguards and policies currently manages a team of eight full-time employees, all of whom are in technical roles and have experience implementing projects in the field. See response [1f](#) (entitled *Institutional expertise*) for further details on existing institutional capacity.

c. The HRCC Director would have the direct responsibility for ensuring that Programme Offices under the authority of WWF International understand and implement WWF human rights commitments, as well as overall responsibility for ensuring that other offices throughout the Network understand and implement WWF human rights commitments. Among other things, the HRCC Director would ensure that:

- **all WWF staff are trained in WWF’s human rights commitments and social policies;**
- **WWF staff in National Organisations and Programme Offices are provided with clear and practical guidance on how to implement WWF’s human rights commitments, including those relating to indigenous peoples and local communities;**
- **National Organisations and Programme Offices carry out human rights due diligence procedures (see Recommendation 5) in designing and implementing initiatives; and**
- **good practices and lessons learned are disseminated and shared throughout the Network.**

The director of E&S safeguards and policies already holds the direct responsibility for ensuring that all WWF offices understand WWF’s human rights commitments. As described in the response to [1f](#), this has included the roll-out of a mandatory training module for all staff but also E&S safeguard drop-in clinics and tailored training delivery to individual offices (recent examples include France, India, Madagascar, Mexico, Nepal, Paraguay, Peru, Switzerland, and Uganda). These training exercises have been designed following portfolio reviews for that office, identifying where the E&S safeguard risks are either known or likely to be highest, and steps the office should take as a result.

Accountability for ESSF implementation rests with the management of the implementing office, in full collaboration with any WWF office(s) in the donor role. The director of E&S safeguards and policies is responsible for monitoring and oversight at the network level and reports to the ARCC on status and input on required actions (e.g. short-term corrective, longer term preventative, resource/capacity related, escalation steps, and adaptive measures required to improve oversight, compliance or implementation effectiveness). The graphic below provides a summary of the institutional responsibilities (taken from E&S safeguards [framework summary \(“Network Implementation Arrangements”\)](#) document on panda.org).

The institutional arrangement to implement the framework is summarized below.



A foundational training course, Making Sense of Safeguards, was introduced in April 2020, which 7,500 staff and board members across the network have completed. The course is also a mandatory component of the onboarding process for new staff hired across the network.

The Walk the Talk - Human Rights in Conservation Exchange training course was launched in July 2019 with ongoing, open enrolment for staff. With a focus on social policy principles and the integration of human rights approaches into conservation action, enrolment is aimed at those staff most likely to encounter these

issues in their work, with almost 2,000 participating in one or more sessions, and nearly half completing the entire curriculum. A follow-up exchange is being considered for 2021.

An E&S Safeguards Practitioners Group has been established at network level and is chaired by the director of E&S safeguards and policies. The group acts as the primary mechanism to ensure that all offices have clarity on, and support to, implement E&S safeguard commitments, including those related to IPLCs. As lessons learned emerge from the first phase of E&S safeguards implementation, the group will also lead on capture and dissemination.

The group comprises staff who work full or majority time on safeguard and social policy issues, and currently has 41 members. Increased representation from managed offices (by WWF International and WWF-US) is being sought. The group works through peer-to-peer support, raising and resolving issues on E&S safeguards interpretation, and drafting and peer reviewing of implementation tools and guidance. Group members – particularly those from the larger national organizations – also have a direct responsibility for monitoring and oversight of E&S safeguards implementation where their home office is involved (as a donor or implementer). Members of the E&S Safeguards Practitioners Group are requested (or more typically, volunteer) to act as mentors to landscape teams for the initial screening (due diligence) stage of an ESSF application. Approval of safeguards screens, categorization memos, or other formal documents is currently restricted to those managing the dedicated safeguards teams in WWF-International and WWF-US. As practitioners become formally accredited, approval rights will be delegated (except for high risk landscapes/seascapes).

d. The HRCC Director should be responsible for monitoring and regularly reporting to the International Board on compliance by National Organisations and Programme Offices with WWF's human rights commitments.

Please see the response to [4c](#) above. The director of E&S safeguards and policies holds the monitoring and oversight responsibility at network level, reporting to the NET and ARCC on status and advising on any actions required (e.g. short term corrective, longer term preventative, resource/capacity related, escalation steps, and adaptive measures required to improve oversight, compliance, or implementation effectiveness).

e. WWF National Organisations and Programme Offices should each appoint or designate an individual with responsibility to ensure that the office fulfils its due diligence and other human rights commitments, and who has the necessary expertise and support. The individual should report directly to the executive director of the office and to the Network HRCC Director. This position may build on the experience learned in the SD4C programme, but it would not be a voluntary position as in SD4C.

As described in the response to [4c](#) above, an E&S Safeguards Practitioners Group, which includes several SD4C focal points, has been established and comprises 41 staff members from across the network who work full or majority time on safeguard and social policy issues. The composition and remit of the group will be reviewed considering the panel's recommendations. The network currently has over 100 offices, and therefore practical consideration is required of how to balance the inclusiveness/representation of the group and its governance and effectiveness. Under the ESSF, the responsibility for ensuring that adequate E&S due diligence has been undertaken rests with the landscape lead and relevant office and/or regional management. They are supported by project managers and increasingly by national- or landscape-level community liaison and human rights positions (e.g. in Cameroon and the Republic of Congo). Regional safeguard heads (employed by WWF International and WWF-US) and safeguard practitioners within national organizations provide support and quality assurance. Responsibilities are summarized in the graphic below.

Who is Responsible?



CEOs and Country Directors:

Responsible for full compliance with ESSF, responsible for approving projects and accepting the ESSF risks and mitigating strategies



Landscape/Seascape Leads:

Responsible for screening and ensuring project budgets are sufficient for safeguards assessments and mitigating actions

WWF acknowledges the panel's recommendation that staff with E&S safeguard responsibilities in the network have a co-reporting line to the director of E&S safeguards and policies. WWF has opted for a different accountability model as described in the preceding paragraph but the director of E&S safeguards and policies will directly contribute to performance assessment of such staff (via multi-rater feedback or similar).

The accountability effectiveness of the model will be included in the terms of reference for an evaluation of the first 18 months of E&S safeguards roll-out, as requested by the ARCC. This will be commissioned in 2021.

f. The Network should create a human rights practice group that is chaired by the HRCC Director and includes representatives from offices throughout the Network. The practice group should provide a forum to discuss cross-cutting issues and share good practice.

As described in [4e](#), WWF will review the composition of the E&S Safeguards Practitioners Group, which already includes several SD4C focal points, and evaluate the group's remit. Existing groups on WWF's internal collaboration platform already provide forums for discussion of cross-cutting issues. For example, the Safeguards in Conservation Group has over 800 members from across the network. Furthermore, once the human rights advisory group described in [4b](#) is established, the director of E&S safeguards and policies will share outputs from that group and foster cross-cutting dialogues throughout the network.

Recommendation 5:

Establish and implement human rights due diligence processes.

WWF should clarify and institutionalize the steps required for its human rights due diligence process, including: (a) assessing all actual and potential human rights impacts of its proposed initiatives; (b) consulting with those who may be affected and taking into account their views; (c) ensuring action plans effectively address the human rights impacts identified; and (d) monitoring and evaluating implementation of the plans.

a. Assessment. The assessment process should identify the potential and actual human rights impacts relating to a proposed WWF project or other initiative. The assessed impacts should include not only those that WWF may directly cause through its own actions, but also those to which it may contribute and those to which it may be directly linked through its partnerships. WWF must take particular care, in accordance with its own commitments and human rights norms, to assess the impacts on rights of indigenous peoples and local communities.

In its draft ESSF, WWF has proposed developing risk assessments and action plans for each landscape and seascape in which it works. However, WWF's own commitments, the safeguard mechanisms of many of its donors, and human rights norms require that assessments of potential human rights impacts and ensuing action plans address and mitigate those impacts at the project level. WWF needs to ensure that its due diligence procedure applies to all projects and other initiatives that may give rise to human rights impacts, including its country and management agreements with governments and other partners.

The ESSF is designed to manage risks, uphold human rights, and structure conservation projects to deliver better outcomes for communities and nature. WWF uses ESSF to identify, avoid, and mitigate negative social and environmental impacts within our work. As described in the response to [1a and 1b](#), the ESSF applies to all field-based operations and throughout the entire cycle of work (conceive, consult, design, implement, monitor, and review).

While some institutions use project size to determine safeguard application, WWF has committed to progressively applying ESSF to all field-based activities that we implement or fund. The unit of application for safeguards in WWF is the landscape (or seascape)—the places where WWF supports field conservation. WWF aggregates projects financed from different sources into programmes at landscape level¹⁰. WWF assesses all activities within a defined landscape/seascape and subsequently develops a mitigation framework at that level so that even our smallest projects are safeguarded. This landscape/seascape-level approach also promotes greater collaborative planning, budgeting, management, and monitoring support between the implementing and the donor office(s) across the network.

The safeguards screening tool includes a series of questions to carefully assess the potential impacts of projects within a landscape/seascape on the rights of IPLCs, including access rights and restrictions, exclusion, and displacement, with particular attention paid to vulnerable groups. It also provides prompts for other issues impacting human rights, children's rights, conflict sensitivity, and gender equity, including gender-based violence, sexual exploitation, and abuse.

As described in the response to [2a-c](#), where human rights risks have been identified – especially those involving law enforcement, restriction of access, and potential impacts on indigenous communities – WWF will assess the operational context, including:

- The host country legal framework, including access to justice;
- WWF's role and degree of influence and leverage;
- Past experience with, or public information on, the commitment and capacity of the partner(s) to address the issues captured in the ESSF.

Through this approach, WWF will determine the risk profile of the proposed agreement, escalate in accordance with the [Network Standard on Risk and Quality Assurance](#), and structure and negotiate agreements to mitigate risks accordingly.

¹⁰ The mean size of a WWF project, calculated in terms of annual spend and before aggregation, is €178,000, and the median project size is €46,000.

If an agreement with a government or partner is approved to proceed, WWF will include the relevant E&S safeguard provisions, inclusive of our human rights commitments, in the agreement. In geographies where the contextual risks are considered high, or the subsequent negotiation of agreement terms leaves WWF with a material residual risk on a human rights or other safeguard issue, the final proposed terms of the agreement will be escalated for approval (CQC or International Board). Through this process of specify-negotiate-escalate-approve, WWF delivers a consistent approach.

When a new project is proposed in a landscape/seascape that has already been safeguarded, an ESSF review will be applied at the project level to determine if it brings any new risks, partners, or other factors that could materially impact the existing mitigation framework. And until every landscape/seascape in WWF's portfolio has been safeguarded, project-level assessments may on occasion precede them (typically when a funding approval is pending). In either scenario, such project reviews and related mitigation require approval by an accredited ESSF expert.

b. Consultation. In accordance with uniform guidance provided by the WWF HRCC Director, National Organisations and Programme Offices should consult with potentially affected stakeholders in assessing potential human rights impacts in the course of designing projects or new initiatives; developing an action plan; and monitoring its implementation. Consultation should begin at an early stage, so that it may provide meaningful input into the assessment and the development of the action plan.

Through [E&S Safeguard Standard 2 on Disclosure](#), WWF commits to public consultation "based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information in a timeframe that enables meaningful consultations with stakeholders in a culturally appropriate format, in relevant local language(s) and is understandable and accessible to diverse stakeholders". The standard additionally specifies that consultations "be carried out on an ongoing basis as the nature of issues, impacts and opportunities evolves".

The standard specifies that consultation is a two-way process, that:

- Begins early in the activities planning process to gather initial views and to inform project design;
- Encourages stakeholder feedback, to inform activities design and foster engagement by stakeholders in the identification and mitigation of environmental and social risks and impacts;
- Continues on an ongoing basis, as risks and impacts arise;
- Considers and responds to feedback;
- Supports active and inclusive engagement with project-affected parties;
- Is free of external manipulation, interference, coercion, discrimination, and intimidation;
- Is documented.

It further states that for any activity considered either medium or high risk, formal consultation takes place with affected stakeholders at least four times:

1. During stakeholder analysis to identify most relevant stakeholders who will be affected by the activities;
2. During scoping and before the terms of reference for the impact or other assessments are finalized;
3. Once a draft assessment or mitigation framework is prepared;
4. During monitoring and reviews.

When potentially affected communities are indigenous, E&S Safeguard Standard 6 on *Indigenous Peoples* also applies, which requires a process of engagement to inform indigenous peoples of the proposed activities, listen to their views, adapt the activity design, and seek their Free, Prior, and Informed Consent (FPIC).

[E&S Safeguard Standard 3 on Community Stakeholder Engagement](#) specifies an “inclusive process to support the development of strong, constructive and responsive relationships which encourage positive outcomes for both stakeholders and conservation, and that help to identify and manage risks”. This continues throughout WWF’s engagement in the landscape/seascape.

Each step of the ESSF requires documented assurance of its completion and, where specified, accredited safeguard reviewer or management sign-off. These documents, including risk screenings, stakeholder engagement plans, mitigation plans, compliance reports, complaints, and mediation results, must be completed and held on the project file(s).

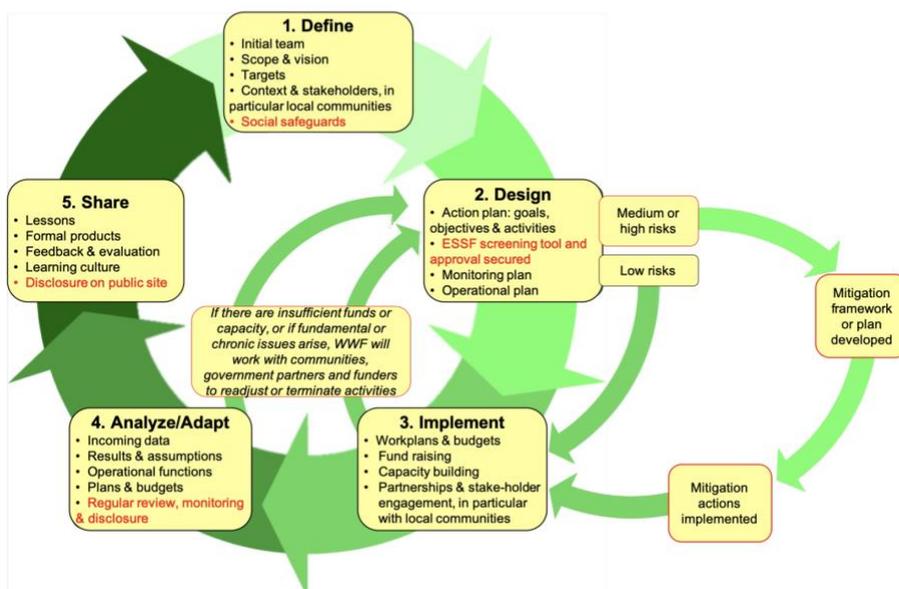
While we are confident that the specific E&S safeguard requirements listed above address the panel’s recommendation, the current COVID-19 pandemic has made it challenging, and at times impossible to move ahead with consultations. We are advancing what can be done while respecting social distancing (e.g. running baseline assessments through Zoom and agreeing on terms of references with consultants so that they can go to the field immediately it is safe for them and the communities to do so).

c. Action plan. *The outcome of the due diligence procedure is to ensure that WWF fulfils its human rights commitments by adequately addressing actual and potential human rights impacts that WWF may directly cause or contribute to, and those to which it may be directly linked through its partnerships. The action plan should clearly identify appropriate actions to prevent and mitigate potential negative impacts, set out the responsibilities of the WWF offices and partners concerned, and provide for sufficient funding and other resources to carry out those responsibilities. For higher-risk landscapes/seascapes, projects and other initiatives, WWF should seek independent expert advice in the course of developing the action plan. Initiatives that may significantly affect indigenous peoples or local communities should be classified as higher-risk.*

The process by which WWF will mitigate risks that could affect communities is codified in [E&S Safeguard Standard 1 on Environmental and Social Risk Management](#) and in the E&S safeguards [framework summary \(“Network Implementation Arrangements”\)](#). They prescribe the process by which landscapes/seascapes are screened (due diligence) and identified safeguard related risks addressed by a mitigation framework (as described in more detail in the response to [5a](#) above).

Safeguards and WWF Project and Program Cycle

The safeguards framework has been designed to be implemented within WWF’s project and program management system, which will be progressively strengthened to implement this framework.



Mitigation and mitigation planning efforts are proportional to the intensity and probability of the negative impacts on communities but, unless all activities are deemed low risk, these efforts will include an assessment of the risks and stepwise plans to manage these risks. As these assessments and plans are being developed, WWF requires active consultations with potentially affected communities and public disclosure of the risks and the plans to manage them. These mitigation plans are reviewed and approved by an accredited safeguards expert as a formal quality assurance step.

WWF designates landscapes/seascapes as high risk where there is potential for human rights abuses and where there is layered, complex safeguard risk. These include activities in fragile, conflict-, or violence-affected (FCV) states, or regions of states that have histories of systemic human rights abuses. WWF's FCV reference source is [the list published annually by the World Bank Group](#), which was last updated in July 2020.

High-risk landscapes/seascapes have additional safeguards implementation requirements:

- Use of independent experts in analysis and development of specialized mitigation plans;
- Additional due diligence, including annual site visitation and verification of safeguards implementation by experts independent of the project team;
- Approval by the NET, delegated to the CQC, to proceed with project development and to determine the arrangements for approval of plans and oversight of implementation.

Where the landscape/seascape or specific project activity is identified as potentially high risk, a qualified safeguards expert will become involved at the earliest stage of design. This ensures that the necessary assessments and consultations are integrated at the outset of detailed design, including any required budget. The resulting mitigation plans must address all applicable E&S safeguards requirements and the funds needed to implement them.

If the accredited safeguards reviewer, the CQC, or the NET are not assured that the proposed E&S mitigations can be successfully implemented in high-risk landscapes/seascapes, redesign will be requested. If assurance is still lacking following redesign and the residual risks remain unacceptably high, the activities could be cancelled on the recommendation of the NET.

d. Monitoring and evaluating implementation. Because human rights impacts may change over time, the responsible WWF office should regularly consult with its partners and affected stakeholders, including indigenous peoples and local communities, to determine the extent to which the plan is meeting its goals and whether the goals remain adequate. On the basis of such tracking and consultation, the responsible WWF office should identify and report on problems, propose responses and, together with the other WWF offices involved, decide on the appropriate actions to take.

WWF appreciates that risk is dynamic, especially in high risk contexts. If the perceived level of risk increases, the landscape lead will be asked to re-assess implementation activities and seek to mitigate new or revised risks. If the amended approach still proves inadequate, or other factors make it impossible to mitigate successfully, WWF works with its funding agencies and government partners to act and respond. This includes the right to hold disbursements or cease activities if circumstances remain untenable.

The ESSF and WWF's project management procedures set expectations for routine monitoring. For E&S safeguards, it is the country director who is responsible for ensuring that monitoring occurs and that any outcomes or recommendations are reviewed and acted upon. The country director is supported in this role by the landscape leads and the regional safeguard heads. As the ESSF is rolled out and more landscape mitigation frameworks are in place, the regional safeguard heads will request portfolio reviews with the relevant country directors and the regional director. These are likely to be six-monthly, but high-risk

landscapes and those on a “watch list” (e.g. due to concerns from a prior review) will require an increased frequency. The CQC is also notified of all high-risk landscapes/seascapes, including those where the risk profile changes during implementation. The CQC can request formal discussion of any high-risk landscape/seascape.

Annual missions to high-risk landscapes will include mandatory review of safeguards implementation. Additionally, as part of routine activity at the landscape/seascape level, WWF project staff engage with stakeholders and partners. If such exchanges identify a concern, staff record it directly and/or inform the stakeholder about how they can submit a grievance. Concerns related to E&S mitigation will be recorded in the project record and communicated to the landscape lead. If adaptation of the mitigation framework is required, an accredited safeguards expert will review and approve.

e. Human rights should be mainstreamed into programmes and projects across the Network, with regular social audits to confirm compliance. Social audit teams could be drawn from across the Network to include human rights expertise. When internal monitoring reveals actual or potential systemic or large-scale problems, independent expert reviews should be commissioned.

We acknowledge the panel’s recommendation. Dedicated social audit teams are not part of our current approach (as described in [5d](#)). The effectiveness of our approach – together with the role assigned to the Network Internal Audit function below – will be included in the terms of reference for an evaluation of the first 18 months of E&S safeguards roll-out, as requested by the ARCC. This will be commissioned in 2021.

The ESSF does prescribe specific monitoring and supervision requirements, including the need for independence and objectivity. The ombudsperson will also hold formal oversight responsibility for landscapes/seascapes where there are open complaints involving human rights violations.

The role of WWF’s Network Internal Audit function (which reports directly to the chair of the ARCC) also was considered during the establishment of the ESSF. While the quality assurance of all WWF safeguards rests with the ESSF team, the Network Internal Audit function will review offices on a rolling basis to confirm that risk screenings and mitigation plans have been uploaded into the central database, and that cases filed through grievance mechanisms are appropriately documented in the complaint management system.

f. WWF should encourage dissemination of lessons learned and good practice across the Network. There could also be opportunities for cross-Network learning by involving staff from other country programmes to help supervise and support programmes that are facing particular challenges.

As described in [4e and 4f](#), the E&S Safeguards Practitioners Group, which already includes several SD4C focal points, provides a structured community of practice and is designed to share learnings and good practices. Existing groups on WWF’s internal collaboration platform also provide forums for discussion of cross-cutting issues. For example, the Safeguards in Conservation Group has over 800 members from across the network. Furthermore, once the human rights advisory group, described in [4b](#), is established, the director of E&S safeguards and policies will share outputs from that group and foster cross-cutting dialogues throughout the network.

WWF will also use the [CIHR consortium](#) to promote cross-learning opportunities across the conservation NGO sector.

Recommendation 6:

Ensure compliance with commitments relating to indigenous peoples and local communities (IPLCs).

WWF must take more concrete steps to fulfil the commitments in its 2008 Statement of Principles on Indigenous Peoples and Conservation and its 2018 Network Guidelines on Prevention of Restriction of Rights and Involuntary Relocation and Resettlement of Indigenous Peoples and Local Communities...

a. Each WWF National Organisation and Programme Office in such landscapes/seascapes should have an IPLC coordinator who has expertise in indigenous rights and community consultation, and who has sufficient support to engage with IPLCs in the landscape and ensure that they have input into the development and implementation of WWF activities.

WWF will dedicate the necessary capacity to effectively engage and support IPLCs as part of an inclusive conservation agenda. In many high-risk landscapes/seascapes and where WWF's activities have a significant impact on IPLCs, WWF has dedicated capacity that understands IPLC rights and can lead engagement with these communities. As WWF navigates the ESSF process, risks related to IPLCs are being surfaced, prompting us to review our strategy in these landscapes/seascapes. Where capacity gaps are identified, WWF does not always view hiring additional personnel as the solution: we also actively seek to partner with local civil society organizations (CSOs) and other partners that are representative of IPLCs within the landscape/seascape. Engaging with CSOs and partners brings the additional benefit of supporting local capacity development. The country director is ultimately accountable for assuring implementation of the ESSF and must work with the landscape/seascape lead and ESSF expert to find the solution that is most appropriate for the local context.

WWF has also been focused on strengthening the capacity of existing staff and identifying and leveraging existing staff expertise. Members of the E&S Safeguards Practitioners Group, SD4C, and Governance Practice have all provided expertise that has been made available to landscape/seascape teams in order to support work related to IPLCs. We also see the accreditation process for safeguards experts as a vehicle for promoting greater professional development and cross-learning opportunities for staff with IPLC expertise, together with exposure to initiatives or experts outside WWF.

b. WWF should regularly organize inclusive forums at local, national and international levels for discussion of issues concerning IPLCs, and should work to strengthen management and governance of protected areas to ensure that they include meaningful and effective participation by IPLCs.

The application of ESSF at landscape level updates and codifies the existing WWF requirement to consult with project affected persons and wider stakeholder groups, including government agencies or bodies. The ESSF is clear in stating that stakeholder engagement is a dynamic, ongoing process, rather than a one-off activity, addressing issues, impacts and opportunities as they evolve. For indigenous peoples, FPIC drives the nature and structure of engagement.

Landscape screenings, with their emphasis on contextual analysis as well as E&S safeguard compliance, will routinely identify systemic issues affecting IPLCs which are best addressed through the forums at local, national and international level that the panel recommends. Ongoing examples of WWF participation in such forums include the Working Group for Indigenous and Community Conserved Areas (ICCAs) in Indonesia (WGII), which was co-established in 2011 by 10 human/indigenous peoples rights and environmental civil society organizations to promote the recognition and registration of ICCAs. WGII has now become the single most important advocacy platform for ICCAs and community-based conservation in Indonesia, with its contribution acknowledged by government agencies at local and national levels, and by IPLCs. WWF will also

use the [CIHR consortium](#) to promote the need for – and subsequently deliver – such forums across the conservation NGO sector.

As the report acknowledges, there are protected (or proposed protected) areas where WWF has worked to support or strengthen government platforms (e.g. the multi-stakeholder initiative to promote IPLC participation in land use planning in Messok Dja, Republic of Congo, and the multi-stakeholder platform that resulted in a historic agreement between the government and indigenous Baka people in Lobéké, Cameroon). The increased emphasis being given to contextual analysis at the screening (due diligence) stage of landscape work will identify commitment and/or capacity gaps of WWF partners. Where the residual risk is considered high, these initiatives will be escalated to the CQC for review. If WWF cannot satisfy itself that it has the influence, resources, or sufficient partner alignment to implement the identified actions, it will not proceed and, instead, reconsider its role or the overall design of the work programme.

c. WWF National Organisations and Programme Offices should engage with, and where possible employ, indigenous people and members of local communities, especially in relation to conservation and protected area management.

WWF fully supports this recommendation and has made efforts to hire local/indigenous capacity directly in many places where there is a rationale and opportunity to do so. These efforts have ranged from places as diverse as the Northern Great Plains in the United States to the Congo Basin. For example, in Cameroon, WWF worked with partners to advocate for increased inclusion of BaKa people in ranger training programmes at the national forest school, and one BaKa ranger has already been appointed to a government role at the Ministry of Forests and Fauna (MINFOF). In the Central African Republic (CAR), the Dzanga-Sangha complex of protected areas is one of the country's largest employers in the CAR, with over 250 people supporting the protected areas' operations, 30% of whom are Ba'Aka. Ninety per cent of the 60-person staff that work on the Primate Habituation Programme are Ba'Aka. Furthermore, in the WWF-supported Ndima Kali Community Association, elders teach traditional practices to hundreds of Ba'Aka children, which both helps maintain their cultural identity in the face of external pressures and also prepares the next generation for potential jobs as trackers and guides in the tourism industry. The first Ba'Aka to study law and politics at the university in Bangui was also supported by the WWF schools programme in Dzanga Sangha.

WWF already has many staff that come from local communities and/or identify as indigenous, including members of our senior leadership teams. WWF is further developing a standard on diversity, equity, and inclusion (currently in draft). It will be one of the critical standards and policies that all WWF offices agree to uphold through the revised values commitments, signed by all WWF offices and their board chairs by end of September 2021.

Beyond direct employment, WWF looks for IPLC representation in the decision-making processes governing our work in the field. WWF's [Standard 3 on Community Stakeholder Engagement](#) aims to strengthen WWF's engagement with local communities, including indigenous peoples who may be impacted by our work, as required in WWF's Social Policies, Project and Program Standards (PPMS). WWF also considers the approach to inclusivity by any third party that it engages on-the-ground and intentionally seeks to partner with those that include and/or represent IPLCs.

d. WWF National Organisations and Programme Offices should partner with and support appropriate local civil society organisations that are already engaged with IPLCs. Where the organisations provide independent advice and support to IPLCs, WWF should ensure that the logistical and financial relationship preserves that independence both in appearance and in fact.

WWF has actively been engaging IPLC structures in its projects and partnerships with IPLC organizations are a common element of WWF's project design. In WWF's [Statement of Principles on Indigenous Peoples and Conservation](#), WWF committed to "seek[s] out partnerships with local communities, grass roots groups, non-governmental organizations, governments, corporations, international funding institutions, and other groups, including indigenous communities and indigenous peoples' organizations". [E&S Safeguard Standard 6 on Indigenous Peoples](#) puts in place a framework to more clearly operationalize and provide due diligence on this policy and its commitments. As ESSF is implemented at field level, it gives WWF the opportunity to systematically review partnership opportunities (beyond the scope of an individual project).

When establishing third-party grievance redress mechanisms in high-risk landscapes/seascapes, WWF has been adopting a model first applied in Dzanga Sangha in the Central African Republic. It establishes a local human rights group as a critical partner, not just in terms of actively seeking out grievances but also by directly supporting WWF's consultation with the community and by providing support services to the community outside of WWF's direct engagement with it. WWF seeks, through its agreement with the partner, to ensure that there is adequate funding and contractually affords the partner the independence it needs to fulfil its obligations objectively. This model has recently been put in place in Cameroon and is being introduced to Salonga in the Democratic Republic of the Congo.

e. The due diligence process should mainstream IPLC issues, including by carefully assessing potential impacts on IPLCs and their rights, ensuring full and effective participation of IPLCs throughout the development and implementation of proposed initiatives, and implementing mitigation and monitoring measures that satisfy WWF's commitments in its Statement of Principles and Network Guidelines, including ensuring that its partnerships with governments do not undermine, and if possible actively promote, the basic human rights and customary resource rights of IPLCs. The due diligence process should identify at the earliest possible stage whether any proposed actions implicate the right of free, prior and informed consent and, if so, make clear how that right will be respected through appropriate procedures and safeguards.

The ESSF has been constructed to ensure that due diligence processes mainstream IPLC issues and rights. Six of the E&S Safeguard Standards codify this: [Standard 2 on Disclosure](#); [Standard 3 on Community Stakeholder Engagement](#); [Standard 4 on Grievance Mechanism](#); [Standard 5 on Involuntary Resettlement and Restriction of Access](#); [Standard 6 on Indigenous Peoples](#); and, [Standard 7 on Community Health, Safety, and Security](#). These standards establish requirements of what landscape/seascape teams need to do to mainstream IPLC concerns throughout the project cycle, including due diligence (screening). The safeguard screening tool drives the due diligence and has a broad scope that extends beyond the E&S safeguards to contextual risk factors; partner and other third-party reliance risks; social policies; and cross-cutting issues such as human rights, gender equity, children's rights, and climate change.

In places with long histories of conflict, including between communities, and/or weak governance and/or weak access to justice, we recognize that WWF will not be able to navigate these risks independently. Potential partner identification is therefore part of design and due diligence. We will also engage donors to confirm there is common understanding and alignment of approach.

Due diligence outcomes (screens) are approved by the country director and an accredited safeguards reviewer, who verify its scope, analytical quality and whether additional resources are required to complete the due diligence and/or the further assessment and mitigation planning stage.

For activities involving a government or other partner, and in landscapes where the contextual risks or potential residual risks are considered high, the CQC will be notified. Where deemed necessary, it will be called for discussion and the CQC has the authority to request further due diligence or concept redesign, or

to recommend that the activities are not undertaken. Through this process of screen-escalate-approve, WWF ensures consistency of approach.

When a new project is proposed in a landscape/seascape that has already been safeguarded, an ESSF review will be applied at the project level to determine if it brings any new risks, partners or other factors that could materially impact the existing mitigation framework.

After due diligence, the assessment and mitigation planning stage results in a framework for the landscape/seascape (and/or the specific activity) that is approved by an accredited safeguards expert. Landscape/seascape mitigation frameworks will be publicly disclosed and progress against them tracked as a routine part of monitoring and evaluation. Continued consultation and engagement with IPLCs are a core aspect of project implementation as is access to a grievance mechanism. These steps allow potentially affected communities to be engaged throughout the project life cycle, to express their desires or concerns, and hold WWF accountable.

f. In relation to protected areas in which customary rights of access and use existed historically but are not currently respected in law or practice, WWF should work with the authorities, the IPLCs and other stakeholders to promote and support mitigation measures and develop a plan of action that describes the measures and the arrangements for implementation. These may include recognition of rights of use and access in park management plans, community forests and zoning of protected areas, and clarification of the boundaries of different zones to all interested parties, including rangers and IPLCs themselves.

WWF commits to ensuring that new conservation areas, where supported with our funds, are not established without the FPIC of indigenous peoples; that access restrictions are not imposed without voluntary consent; and clear plans are established to ameliorate any impacts on the community. In existing conservation areas, WWF will work with the authorities and local groups to ensure that local communities benefit from conservation and promote mitigation measures to address access restrictions, human-wildlife conflict, and other issues. Management arrangements need to provide for rights as agreed with IPLCs while also recognizing that with rights come the responsibility to oppose any commercial or other illicit exploitation, that any use is sustainable, and that endangered species are not extirpated. The intention is to provide secure rights for IPLCs, who serve as guardians for nature, and whose protection is critical for sustainable conservation into the future.

WWF recognizes its commitments through the [Statement of Principles on Indigenous Peoples and Conservation](#) to “encourage governments to ‘take steps as necessary ... to guarantee effective protection of [indigenous peoples’] rights of ownership and possession’ of those lands and territories, as determined by the ILO Convention 169 (Art. 14)”. Where indigenous peoples live, “WWF will exercise due diligence to seek out information about the historic claims and current exercise of customary rights of indigenous peoples in that area; and inform itself about relevant constitutional provisions, legislation, and administrative practices affecting such rights and claims in the national context”. The ESSF screening process elevates these concerns in landscapes where WWF works and affords an opportunity to identify the need for the country office to act upon its social policy commitments. These considerations are often directly integrated into the landscape/seascape stakeholder engagement plan.

WWF has addressed access issues arising from historical conservation measures, including in the Congo basin. As addressed in the panel’s report, WWF supported a process in Cameroon that enabled BaKa communities to reach an agreement whereby they regained access to three parks for subsistence hunting and traditional uses. An agreement facilitating access rights was signed in February 2019. This also includes commitments to hire and engage the expertise of BaKa in the implementation of park activities and to

establish a multi-party oversight body comprised of the agreement signatories, government agencies, and development agencies, among other provisions to benefit local communities.

In the Democratic Republic of the Congo, WWF played an active role in pushing for national legislative changes passed in 2015 that allow for the transfer of concession rights to communities under the new designation of community concessions. These concessions enable social forestry and provide tenure and secure access rights for forest dwelling communities. WWF works with communities countrywide to establish community concessions, where the rights have been transferred. Forty such concessions have now been created, of which six are in Salonga (covering an area of 170,000 hectares and three for BaTwa are in the process of being created (adding a further 14,000 hectares). The process of establishing the concessions requires extensive consultation, participatory mapping, and planning and legal support.

g. WWF International should identify an IPLC Coordinator, who has a mandate to develop and disseminate detailed guidance to all WWF offices on FPIC procedures, implementation of WWF commitments on IPLCs, and mainstreaming IPLC issues into the human rights due diligence process. The IPLC Coordinator should work in cooperation with the WWF HRCC Director.

WWF thanks the panel for this recommendation to appoint an IPLC focal point. We are appointing the regional safeguards head for Asia to this role, who has many years of experience of engagement on IPLC issues and FPIC processes. She reports to the director of E&S safeguards and policies and will establish working groups as needed to develop guidance and other tools, drawing on the E&S Safeguards Practitioners Group, Governance Practice, human rights advisory group and other resources inside and outside WWF. Completing the WWF guidance note on FPIC is the first assignment in this role.

h. WWF should encourage protected areas where it works to adopt the IUCN Green List process. The Green List of Protected and Conserved Areas provides standards and indicators to strengthen good governance and design and planning of protected areas for more effective management and conservation outcomes.

The IUCN Green List of Protected and Conserved Areas is the first global sustainability standard describing best practice for area-based conservation. It is organized around four components: good governance; sound design and planning; effective management; and successful conservation outcomes – and works through a tiered certification process with independent assessment. In 2015 WWF's Director General and IUCN's Director General announced a partnership to collaborate on scaling up the coverage of the Green List. WWF offices in several countries have supported Green List applications, including China, Colombia, Indonesia, Kenya, and Korea, and WWF is looking to scale up its efforts, for example through bringing together South American offices regionally to certify more protected areas in the Amazon basin. In Colombia, WWF has linked the Green List process with a large Project Financing for Permanence (PFP) effort. PFP is an innovative approach that works at country level to secure permanent and full funding for a portfolio of conserved areas, and PFP funds in Colombia will be used to help bring areas up to Green List standards. WWF's Conservation Assured/Tiger Standards is linked to the Green List. A WWF staff member is a co-chair of the IUCN World Commission on Protected Areas Green List Specialist Group.

Recommendation 7: *Establish effective complaint mechanisms.*

WWF should provide for complaint mechanisms at the level of individual countries and at the level of the Network. At both levels, complaint mechanisms should have the characteristics identified in Chapter 3, including accessibility, transparency and independence.

a. In all countries, WWF must have a country-level procedure for receiving complaints concerning its staff and those of its partners. (As appropriate, the procedure may be at the level of particular projects.) The procedure must protect complainants from reprisals. Complaint mechanisms should be easily accessible to local stakeholder communities. Information on how to bring complaints should be disseminated in ways that are appropriate to local conditions. This is especially important in countries where stakeholders may not have access to reliable judicial and administrative procedures.

b. Where possible, WWF should ensure that communities have access to an appropriate independent complaint mechanism administered by a local civil society organisation. Preferably, such mechanisms should be able to receive, mediate, resolve and refer complaints not only about rangers, but also about other sources of conflict and abuse. To be effective, these mechanisms must be accessible to the local population, staffed by competent experts, and have sustainable long-term financing. The independent mechanisms should also provide channels of communication to bring to WWF's attention complaints concerning either WWF staff, or the staff of partners to which WWF provides support, including rangers.

c. Financing for complaint mechanisms, including those serviced by independent civil society organisations, should be sought routinely as part of the financing for WWF landscape/seascape programmes and built into regular project budgets.

d. When WWF receives complaints, it should follow through to see that they are appropriately investigated and resolved, ensuring that partners have taken appropriate measures, including, where necessary, disciplinary action. WWF also has a responsibility to track complaints and their resolution in order to determine whether they are isolated incidents or indicative of a more systemic problem. If they indicate a systemic problem, WWF should address the problem in accordance with Recommendations 3 and 5, above.

WWF is strengthening its grievance redress mechanisms across the network. [WWF's Safeguard Standard 4 on Grievance Mechanism](#) commits WWF to "addressing complaints in a timely and effective way, helping resolve conflicts, improving mutual understanding, and strengthening accountability". The system design is based on the principle of proportionality, with additional measures required for high-risk landscapes/seascapes. These mechanisms are complemented by common protocols for how these mechanisms operate and relate to each other, and procedures for escalating complaints.

At country level, WWF offices are required to establish national grievance redress mechanisms and to put in place procedures to enable individuals or groups impacted by WWF-supported activities to raise grievances and seek their resolution. These procedures are required to be "customized to respect the local context, for example, by considering localized cultural and linguistic needs and logistical constraints, as well as where possible to support or supplement existing community complaints mechanisms". National mechanisms feed into a network-wide complaints management database that was upgraded in August 2020. It will facilitate network-level oversight of complaint numbers, nature, status, resolution and closure (if reached). The system will also be routinely interrogated to identify trends, root causes, obstacles to resolution and other factors that prompt system review or dissemination of lessons learned.

When WWF works in high-risk landscape/seascapes, [E&S Standard 4 on Grievance Mechanism](#) requires an additional targeted landscape/seascapes grievance mechanism be designed to best address risks identified and the particular social context. Options include use of community complaints boxes, identifying partners working in these same communities that can receive complaints, and, increasingly, establishing a relationship with a third-party civil society organization (typically focused on human rights) to actively engage potentially affected communities and to surface any concerns or complaints.

This approach has already been implemented with local civil society organizations in Lobéké National Park (Cameroon) and the Dzanga-Sangha protected areas (Central African Republic), and will be rolled out in Salonga National Park (Democratic Republic of the Congo).

Underlying the tiered structure of the grievance mechanism is a set of central requirements to confirm system effectiveness. All offices and high-risk landscapes are required to have in place an established protocol for who handles complaints and how they are managed. All complaints received through any of these are required to be logged and internally tracked in the complaints management database. Escalation protocols require that complaints in high-risk landscapes, of a serious nature, involving office leadership, or involving any human rights violations, are immediately elevated for network-level review, administered by teams who sit in WWF International and WWF-US. The ombudsperson will also be notified of any complaint related to human rights violations.

A recent example of WWF's grievance redress mechanisms in operation was in Nepal in July 2020. WWF-Nepal, an office managed by WWF-US, received a written complaint from lawyers affiliated with the indigenous Limbu community about work in the Tinjure-Milkhe-Jaljale (TMJ) Forest Complex. The complaint was based on the perception that WWF was working with the government to gazette protected areas – and that WWF was doing so without the FPIC of the Limbu community. WWF-Nepal escalated the complaint to WWF-US who supported them in their investigation. WWF-Nepal reviewed the full project in TMJ and confirmed that the project does not involve the creation of protected areas, that the Limbu community has been consulted, and, in fact, that the community is a partner in the project through a local civil society organization. With this information, WWF-Nepal invited the lawyers representing the community to an in-person meeting to clarify the situation, explain WWF's past engagement with the community, and discuss how the structure of future engagements will be carried out. The parties are working on a mutual summary of this discussion, which will indicate the complaint has been resolved.

e. WWF International has committed to appointing an independent Ombudsperson, reporting directly to the International Board, who would be able to address complaints from individuals and communities affected by WWF programmes. Many aspects of the proposal are still not clear, including whether the new position would investigate complaints, conduct mediation, provide redress, or some combination thereof.

The Panel supports the creation of the Ombudsperson Office as long as: (i) it has the authority to monitor the effectiveness of the country-level complaint mechanisms, to receive and investigate complaints that are not resolved by those mechanisms, and to provide redress or recommend other appropriate remedies; and (ii) it is given sufficient resources to fulfil its mandate. WWF should commit to implementing the recommendations of the Ombudsperson that are directed to it.

Submissions to country-level complaint mechanisms that are not addressed to the satisfaction of the complainant or the relevant WWF office may be escalated to the Ombudsperson Office for its consideration. Broader or systemic complaints should be brought directly to the Ombudsperson Office, either by the complainant or by referral from the local complaint mechanism or WWF office to which the complaint was made.

The Ombudsperson Office should maintain a registry of complaints, which describes the nature of each complaint and how it is being addressed, maintaining appropriate confidentiality. A public summary of that record should be maintained on the website of the Ombudsperson Office, which should be separate from the WWF website but accessible from it.

WWF consulted widely in crafting the terms of reference for the newly created role of ombudsperson, including with those serving in a similar role in international institutions. This is a pioneering undertaking in

the conservation sector and even among major development NGOs. The terms of reference reflect good international practices within the independent accountability mechanisms community and moves beyond a focus on compliance to an active focus on dispute resolution and mediation. The Office of the Ombudsperson, through its advisory function, will also provide WWF with independent opinions on systemic issues based on its accumulated experience and broader engagements with the network.

The ombudsperson will directly engage in addressing complaints. This will occur primarily through two means: 1) if a complaint is submitted directly; or, 2) if a complaint cannot be adequately addressed through the grievance mechanism and resolution process described in [7a-d](#). For complaints that the ombudsperson accepts and adds to its case file, the Office of the Ombudsperson will provide “an impartial mechanism for parties to resolve disputes through mediation”. If there is an inability to address the grievance through the dispute resolution process, then an ESSF compliance review would be carried out in the relevant landscape/seascape.

All complaints received by the Office of the Ombudsperson will be logged transparently in a case management system, a case file will be opened, and stakeholders will be informed about the progress of their case. If a landscape/seascape- or country-level grievance mechanism receives an allegation of human rights abuse, a copy of the case file will be sent to the Office of the Ombudsperson. The case “will be routinely updated and include the proposed management actions” and tracked in the transparent case management system.

Recommendation 8:

Be more transparent.

a. The full report of this Panel should be translated into French, and appropriate versions should be disseminated to all WWF National Offices and Programme Offices, and made easily accessible to the public on the WWF website.

WWF thanks the panel for this recommendation and confirms that the panel findings will be translated into French, disseminated to all WWF offices, and made publicly available via panda.org.

b. Each National Office and Programme Office should report annually on that office’s implementation of WWF’s human rights commitments. In preparing the report, the office should consult with interested stakeholders inside and outside WWF. The report should fairly and accurately assess progress and obstacles. It should include information on human rights complaints received concerning WWF’s work in that country (including allegations of abuses committed by rangers in protected areas to which WWF provides support), and how those complaints have been addressed. For complaints referred to a judicial procedure or an independent mechanism, the report should describe how they were resolved.

An upgraded complaints-management software programme was introduced in August 2020. It will facilitate network-level oversight of complaint numbers, nature, status, resolution, and closure. The system will also be routinely interrogated to identify trends, root causes, obstacles to resolution, and other factors that prompt system review or dissemination of lessons learned.

Together with the head of compliance, the director of E&S safeguards and policies will brief the ARCC on the status and analysis of safeguard related complaints. Regional safeguard heads will be responsible for ensuring that such analyses are presented and discussed with regional management and landscape teams. They will also be at liberty to discuss with interested stakeholders outside WWF, providing there is no breach in confidentiality by doing so.

Finally, the ombudsperson will provide a human rights oversight function on behalf of the WWF International Board and its sub-committees (including the ARCC). The ombudsperson's office will be informed of any such complaint through WWF's [Response Protocol on Human Rights](#). Where the ombudsperson is dissatisfied with the approach being taken to resolve a human rights-related complaint, the office can recommend an alternative course of action to the WWF International Board.

As described in 8c below, a proposal will be taken to the ARCC to, at network level, publicly disclose a summary of complaints on an annual basis.

c. The WWF HRCC Director should publish an annual report on implementation of human rights commitments that incorporates the country-level reports.

[E&S Safeguard Standard 2 on Disclosure](#) commits WWF to disclosing a number of landscape-level documents via a portal on panda.org, including a categorization memo, which summarizes the results of screening/duel diligence; the E&S mitigation plan; and, a compliance memo, which summarizes the outcome from mitigation planning and the monitoring strategy going forward. The scope of these documents includes human rights.

A proposal will be taken to the ARCC to, at network level, publicly disclose a summary of complaints on an annual basis. To protect confidentiality, this will be at aggregate level with breakdowns by region, type/subject, and status (i.e. open or resolved/closed). The summary may include case studies, provided that all concerned parties have participated in case compilation and agreed to its disclosure.

In line with other ombudsperson functions,¹¹ it is anticipated that the office will maintain a publicly available website with details of cases that it has accepted.

d. The key documents concerning WWF's involvement in landscape/seascape programmes and projects, including agreements with governments, protected area management plans, codes of conduct for rangers, the action plans described in Recommendation 5, and reports on implementation, should be provided to partners and stakeholders, including indigenous peoples and local communities, that are directly affected. Relevant reports and other documents related to human rights should also be made easily accessible to the public through the WWF website.

[Safeguard Standard 2 on Disclosure](#) commits WWF to "disclosing information relevant to stakeholders and reveal not only general information about WWF funded activities (e.g. duration, scale, proposed activities), but also potential risks for communities and planned mitigation measures". This information must be "targeted to the audience in the appropriate language and channels of communication and in a culturally appropriate, non-discriminatory and gender-sensitive manner, free of external manipulation, intimidation or coercion". For all landscapes/seascapes, WWF will require the disclosure of:

- The safeguards categorization memo which includes a summary of risks;
- The Environmental and Social Mitigation Framework which may be supplemented by an environmental and/or social impact assessment and targeted mitigation plans;
- A stakeholder engagement plan;
- A compliance memo that explains how ESSF requirements have been (or will be) met and monitoring arrangements

In addition to providing this material to local communities, these documents will be published on a central database and made available to the public.

¹¹ See, for instance, <http://www.cao-ombudsman.org/>

Recommendation 9:

Mainstream costs of effective human rights compliance into funding.

The failure of WWF to fully implement its human rights commitments in the past has been due in large part to a lack of resources within programme and project budgets to engage appropriate expertise, and to build capacity to implement and monitor human rights compliance. Donors must recognize that it is no longer acceptable to fund conservation programmes without including adequate and sustainable funding for implementation and monitoring of corresponding human rights commitments.

a. WWF Programme Offices should seek sufficient funding from National Organisations and other donors to implement their human rights commitments effectively. They must make clear to donors the level of resources needed, as a necessary component of conservation initiatives.

b. Donors are responsible for due diligence to ensure that the funds they direct to WWF projects are used consistently with their own human rights commitments. Project agreements between donors and WWF offices should include requirements for monitoring and reporting on human rights commitments as part of regular reporting, and donors should pay close attention to how those commitments are being implemented.

WWF recognizes that without balancing environmental and social needs, conservation is not sustainable. WWF seeks to systematically reorient conservation to enhance its inclusivity, recognizing the complexities inherent in the field, which are themselves an artefact of governance, history, institutional stability, conflict, and other factors. The conservation agenda is critical to advancing sustainable development and achieving the global Sustainable Development Goals. It is imperative in pursuing conservation that field interventions have a holistic suite of actions (environmental, social, economic) as well as accompanying attention to governance and political issues as needed. The financing needed to achieve this is on a scale larger than has been historically available from donors: this is an issue for the conservation community writ large. WWF recognizes that the network has a responsibility to ensure field operations are resourced to implement WWF's conservation vision and accompanying social and environmental safeguards.

In order to support this ambition, WWF will use the ESSF as a driver for action – influencing design of future interventions by WWF country offices. WWF emphasizes the importance of incorporating financing for human rights considerations in project proposals and recognizes this as a shared commitment by both WWF country offices and WWF donor offices and donors. The ESSF states that the cost of safeguarding actions must be incorporated into project budgets. These costs include “all associated costs, including pre-implementation work (such as screening, consultations, etc.), mitigation actions, monitoring, and reporting, as well as any actions taken to address negative impacts flagged during implementation”.

To reinforce this commitment, WWF is amending new funding agreements governing field work in landscapes and seascapes within the network to stipulate that ESSF will be implemented and sufficient funding for these efforts and measures is included in the project budget. The ESSF further stipulates that while “the landscape lead in the country office is responsible for ensuring a project complies with the ESSF”, it also recognizes that donor WWF offices are “responsible for undertaking due diligence and satisfying themselves that the ESSF is or will be complied with by the recipient office as part of releasing its financing”. Where funding from an external donor is insufficient to mitigate human rights risks, it is still the responsibility of donor offices and country offices to work together to find other solutions to underwrite these costs.

WWF undertakes in its contacts with donors to address these issues, but this is something broader than WWF can reasonably achieve by itself. It needs the support of the broader conservation community,

development organizations, human rights groups, and IPLCs to reframe conservation and secure the resources for sustainable development.

c. In many of the countries in which WWF works, one of the main challenges it faces is that its human rights commitments set a significantly higher standard than those applied by the national government, especially in relation to the rights of indigenous peoples and local communities. For WWF to meet its human rights commitments, it is often necessary for it to try to persuade governments to do more to fulfil their own international obligations. WWF International, National Organisations, and especially major external bilateral and multilateral donors have much greater leverage than local WWF offices to promote government compliance with human rights obligations. These actors have a responsibility to use their leverage to support local WWF offices by raising concerns over human rights issues directly with the governments themselves and providing political as well as financial support for implementation of WWF's human rights commitments. They should think creatively about how to use their points of leverage, which may include not only agreements and financial relationships, but also capacity-building of partners, public advocacy, personal relationships, and joint action with other organisations.

WWF is committed to working with all its partners and communities to advance human rights in its programmes and to raise concerns if we learn of human rights abuses. We are also committed to leveraging our influence with governments to press for systemic changes.

All WWF government partners working with us in high-risk programmes are aware of WWF's ESSF requirements. In addition to using WWF's voice, we are also leveraging the influence of public sector donors to press for systemic change and demand that the rights and voices of local communities are heard.

In fragile environments where rule of law is weak, freedom of expression is constrained, or safety and security threats may exist for communities or our staff members, these actions might necessarily need to be conducted through non-public channels. Moreover, many of the problems encountered are deeply rooted in politics, power dynamics between groups, and long-standing conflicts. These local circumstances and safety risks must inform the identification of appropriate levers to foster a just response. Key principles include:

- Simultaneously engaging our in-country government counterparts, global funding partners, and local human rights partners to advise them of the concerns raised, and re-confirm agreed-upon response procedures and immediate next steps anticipated by the partner against whom allegations are raised;
- Suspending or exiting the programme, if appropriate actions are not undertaken;

Depending upon the local context, these actions may or may not be shared in public channels such as local or global press, but all concerns will be transparent to the parties above and tracked through the WWF global system, and our annual human rights report will share the nature of incidents raised and resolution.

In consulting with human rights groups on the measures that WWF can take to enhance its agency, it became clear that challenges to dealing with rights at the field level are widespread and affect the country operations of human rights and development agencies. Given that context, and in fragile environments, the best approach is to socialize action in collaboration with bilateral and multilateral agencies, donors, and a broad spectrum of NGOs. WWF commits to working together with other institutions with an in-country presence in the places where we work to affect action.

Recommendation 10:

Follow up.

The WWF International Board should commit now to appointing an independent expert or body (other than the members of this Panel) to review, and report publicly on, the implementation of these recommendations by the end of 2022.

The substantial measures that WWF is taking to strengthen human rights protections across operations will take time and diligence to implement correctly. WWF is committed to delivering on the recommendations of this report. Doing so requires rolling out the ESSF to all WWF activities in the nearly 100 countries in which we operate. As noted in our response to [Recommendation 5](#), while other institutions or frameworks apply safeguards only to new projects or to projects of a certain size (e.g. [the Equator Principles](#) specify a US \$10 million threshold), WWF has committed to safeguarding future landscape work regardless of size. This has implications in terms of the time required to train people, meaningfully engage local stakeholders and governments, and establish systems that support implementation and compliance. A cornerstone of E&S safeguard implementation and WWF's broader operational model is physically going into communities and engaging directly, especially with vulnerable and marginalized segments of the community. COVID-19 has made it impossible to move ahead with such community consultations in 2020. We are advancing what can be done while respecting social distancing (e.g. running baseline assessments through Zoom and agreeing on terms of references with consultants so that they can go to the field immediately it is safe for them and the communities to do so). Nonetheless, progress on E&S safeguards implementation, particularly in higher risk, complex landscapes, is constrained by COVID-19.

Accordingly, we commit to reviewing the implementation of these recommendations by the end of 2023. The review will be led by the ombudsperson and publicly disclosed. In the interim, the WWF International Board and NET will monitor progress and implementation, and take appropriate measures to confirm that activities are resourced and managed to achieve the desired outcomes. A summary of these interim progress reports will be posted on panda.org.

SECTION 3: COUNTRY-LEVEL RECOMMENDATIONS AND WWF RESPONSES

Cameroon:

Boumba Bek, Nki, Lobéké national parks

WWF has been active in Cameroon since the 1980s. The country is home to more than 1,000 ethnic groups, including some who self-identify as indigenous and seek recognition of their way of life and their rights to the land and natural resources that they have stewarded for centuries. It is also a globally outstanding storehouse of biodiversity, including significant populations of elephants and great apes. The health and well-being of the indigenous peoples and forests are closely connected.

During the last decade, violence in neighbouring countries and increases in poaching activity led to inflows of arms. The civil war in the Central African Republic (CAR) between 2009 and 2013 also resulted in an influx of military weapons. Cameroon has also been fighting the Boko Haram terrorist organization for nearly a decade. The violence has displaced more than 500,000 people internally and caused hundreds of thousands of people from other countries, primarily CAR and Nigeria, to flee to Cameroon. Meanwhile, the high foreign demand for ivory and ivory products has had calamitous effects on forest elephant populations in the region, with poachers commonly hunting elephants and other big game with assault rifles such as AK47s. Ecoguards employed by the Cameroonian government began carrying guns in 2015 and the Cameroonian special forces (BIR) were occasionally deployed in protected areas to confiscate military weapons used in elephant poaching. The increased presence of armed poachers, armed ecoguards, and armed BIR has contributed to a climate of insecurity and potential for human rights violations as indigenous and local communities get caught up in the conflict.

In 1994, the government of Cameroon mobilized international partners to help zone an area of 2.3 million hectares in south-eastern Cameroon as priority sites for conservation and development. The government's intention was to develop it as an integrated development and conservation area following the Zimbabwe CAMPFIRE model, and in 1995 created three provisional zones, which later became the three national parks of Lobéké, Boumba Bek, and Nki.

WWF supports local communities in and around these parks with social development needs as part of an integrated conservation and development scheme. Most of these communities do not have access to safe drinking water, adequate medical care, or schools. WWF initiated a process to set up community forests, which benefit local communities by recognizing their right to manage their ancestral lands and empowering them to benefit from the long-term protection of forest ecosystems. After other international partners pulled out of the region following the global economic downturn of 2008, WWF was the only international NGO that remained on the ground, and communities increasingly began looking to WWF to secure support for child education, access to basic health knowledge, potable water access, and improved nutrition.

WWF works closely with the Bantu and Baka peoples. Bantu communities are traditionally dependent on agriculture, with hunting and fishing as secondary activities. The indigenous Baka have historically relied primarily on hunting and gathering for subsistence. There has been long-standing discrimination against the Baka by the Bantu majority. Historical conflicts, deep-seated historical prejudices, marginalization, and inequality have undermined the welfare of the Baka. Few Baka have had land title or possess birth certificates or other legal identification documents needed to access government social services.

WWF has invested heavily in supporting community welfare and livelihoods. Amongst other things, this work has included:

- Negotiating with the government to secure access rights of Baka indigenous people to parks in south-eastern Cameroon for traditional and cultural use purposes. This addressed a long-standing grievance on the part of communities that they had been denied access to their traditional lands when the parks were established. Further efforts are underway to concretize arrangements to

enhance the participation of indigenous peoples in the management of these parks. In addition, WWF has successfully advocated for the allocation for 14 community hunting zones totalling more than 1 million hectares as well as 44 community forests covering more than 200,000 hectares outside of these national parks, giving communities subsistence hunting and other use rights as well as income generating opportunities. WWF has successfully advocated for the allocation of forest and wildlife royalties to communities to augment their livelihoods. The government has agreed to an initial royalty rate of 10%; another 40% is channeled through councils for local development.

- Supplying specific support targeted at Baka communities, including advocating for the designation of over 10,000 hectares of community forests under their direct stewardship (the management of other areas is shared with other communities) and providing direct support to help community members secure national identity cards and birth certificates – a necessary precondition for accessing government services. WWF and PLAN Cameroon developed an inclusive education strategy for Baka children, successfully advocated for it to be adopted by the local government, and continue to advocate for broader uptake. WWF has provided support around Boumba Bek, Lobéké and Nki national parks for the implementation of this strategy, including by building the capacity of teachers in Baka schools to improve education standards, providing ongoing support for school clubs, and funding scholarships for Baka children.
- Supporting initiatives to empower women, including through sustainable and income-generating activities such as collection and marketing of non-timber forest products, soap making, and pineapple farming; savings and loan programmes; and advocacy that culminated in the government's 2016 reinforcement of the law that stipulates women must be engaged at all levels of decision-making in community forest concessions.
- Supporting public health activities including improving access to drinking water; building latrines; raising awareness on health issues such as waste management, child malnutrition, HIV/AIDs, and zoonoses; and training primary school teachers to educate students on health and environmental issues.
- Contributing to the creation of a complaints mechanism managed by a third-party CSO and a local human rights centre in Lobéké National Park. This is modelled on the successful model in Dzanga Sangha (CAR) and is run by the independent Cameroonian human rights organisation CEFAID. The centre was initiated and financed by WWF. In addition to addressing human rights concerns and serving as a complaints mechanism, the centre also has a social function as a local arbitration body.

WWF also supports the government of Cameroon in carrying out conservation activities. While the government of Cameroon manages the national parks and employs the ecoguards who patrol them, WWF provides logistical, technical, financial and small-scale infrastructure projects, and supports training and regular refresher courses for ecoguards, including on human rights and proper law enforcement procedures. WWF seeks to strengthen the capacity of MINFOF, the government agency that controls administration of national parks, and to promote the engagement of IPLCs in the sustainable management of the protected areas.

There have been conflicts and human rights issues arising between some ecoguards and the Baka, particularly their grievances related to access rights. WWF first raised the issue of access rights with government in 2008, when it commissioned a report on this matter. Our efforts continued, and in 2015/2016, we sought to exert more agency with the government to address these issues. The history of subjugation of indigenous peoples and the complex inter- and intra-group relationships at play, as well as weak local governance, have proven to be major challenges. The panel acknowledged the efforts made by WWF, stating: "WWF-Cameroon has taken positive steps since 2016 to try to fulfil its human rights commitments in relation to its activities in south-eastern Cameroon, including by building closer ties with local civil society organizations, the Ministry of Social Affairs¹² and the National Human Rights Commission in order to support indigenous rights, and by supporting a more effective complaints mechanism. WWF still

¹² Ministère des Affaires Sociales du Cameroun (MINAS)

needs to do more to safeguard the human rights of indigenous peoples and local communities in and around the national parks that it supports.”

The panel has provided further detailed recommendations, listed below together with WWF’s response.

Recommendation 1. A coordinated strategy. It does not appear that the various WWF offices concerned with south-eastern Cameroon have completely addressed the criticism in the January 2018 report that their efforts have been uncoordinated and piecemeal. WWF Cameroon states that it is developing a strategy to guide its social actions in conservation projects that will clearly define its lines of intervention with indigenous peoples and local communities and specify indicators of well-being. It is critical that this strategy is developed both in consultation with the indigenous peoples and local communities themselves, and in close coordination with other stakeholders within the WWF Network to ensure consistent and integrated implementation.

Several ongoing processes promote network coordination and coherence across WWF’s work in south-eastern Cameroon:

- In September 2020, WWF-Cameroon completed a mid-term review of its current strategic plan. E&S safeguards and human rights commitments have been highlighted as key focus areas in the plan, which will be available for public review before finalization, allowing for the incorporation of local inputs. The revised plan will be included in the overall strategic planning exercise being conducted for Africa, coordinated by the Regional Office for Africa (which engages all the concerned WWF donor offices).
- Consistent and integrated implementation will be secured through the operationalization of the ESSF. In Cameroon, this work is already well underway, through an analysis of current and proposed activities, funding sources (both external and within the network), and other fundamentals necessary for assuring the effective institutionalisation of safeguards.
- The April 2020 appointment of a regional safeguards head for West and Central Africa has also improved coordination, as a core responsibility of the role is to ensure a consistent approach is taken in applying safeguards. The October 2020 appointment of a social development officer in Lobéké National Park working under the supervision of the country Indigenous Peoples Coordinator will allow for increased community and local stakeholder engagement. The appointee has a background working with forest communities to establish their rights to land and natural resources, and in establishing dialogue between communities, local authorities, and private companies.

WWF International is developing a set of social impact indicators for roll-out in 2021.

Recommendation 2. Code of Conduct and disciplinary consequences for ecoguards. It is not acceptable that Boumba Bek and Nki ecoguards do not have a Code of Conduct and a process through which violations of it receive appropriate disciplinary sanctions. WWF Cameroon needs to make clear that for all three national parks, adopting the Code of Conduct and implementing it through a rapid response structure that incorporates proper investigation, disciplinary review and appropriate sanctions, including referral for criminal prosecution where justified, are requirements for its continuing to provide support to the ecoguards.

In Lobéké, where WWF has been actively involved, a code of conduct for ecoguards is in place alongside the military code. Through the ongoing process to adopt a new MOU with MINFOF (see 3 below), WWF has emphasized that appropriate safeguard measures must be included and implemented in all landscapes where WWF supports MINFOF, including in Boumba Bek and Nki. This includes the institution of codes of conduct, disciplinary processes, and referrals to the criminal courts (where justified) for human rights violations by ecoguards.

Recommendation 3. Revising the MOU with MINFOF. Similarly, WWF Cameroon needs to make clear that finalizing and adopting the draft MOU with MINFOF in order to fully reflect its human rights commitments and expectations is a requirement for its partnership with MINFOF across all protected areas.

MINFOF and WWF are undergoing discussions to finalize a new MOU. The 2017 draft is the starting point, but there will be additional requirements on human rights and delineation of the accountabilities of state institutions for upholding human rights protections, including those of MINFOF in relation to ecoguards.

Recommendation 4. Preventing abuses by patrols. WWF Cameroon should take proactive steps to prevent abuses by ecoguards, including by rethinking its approach in several respects. First, paying bonuses for items seized gives ecoguards incentives to undertake coups de poing looking for items that will result in bonuses, even if they have no clear evidence that such items exist in the house or village that is the subject of the raid. It also gives incentives to local residents to exploit the system by making false accusations. WWF should consider other approaches, such as providing bonuses to ecoguards who work a certain number of days on patrol, or who develop leads to poachers higher up the chain of responsibility. Second, WWF Cameroon should urge much greater care in the use of coups de poing. The Panel was told that in recent years, as financial support for the TRIDOM protected areas has decreased, anti-poaching strategies in Boumba Bek and Nki National Parks have focused more on key hotspots such as clearings visited frequently by wildlife and that this has contributed to reduced conflict between ecoguards and communities without necessarily reducing the effectiveness of the anti-poaching strategies. This approach should be embraced for Lobéké National Park as well. Third, WWF Cameroon should promote the inclusion of local residents, including Bantu and Baka, in surveillance teams and patrols, which the Panel understands has been effective when it has been employed in the past in Boumba Bek and Nki National Parks, but which has not been employed in Lobéké National Park. Doing so would provide employment to local residents as well as helping to protect against abuses. Fourth, greater emphasis should be placed on training and incentivizing ecoguards to distinguish appropriately between the threats posed by poaching of endangered species such as elephants and the traditional subsistence activities of the Baka that should not lead to arrest and detention. Sensitization of communities should also be improved to reduce the use of techniques such as snares that cause harm to endangered species.

We will continue to engage with the responsible government authorities on alternatives to the current working practices of ecoguards, including the structuring of bonus payments. As described in 3 above, a new MOU between MINFOF and WWF will provide greater clarity on human rights expectations and other aspects of ecoguard conduct in discharging their duties. [The Principles Regarding WWF's Support for Enforcement and Rangers](#) will establish the framework for operations.

Since 2015, WWF has supported government deployment of the Spatial Monitoring and Reporting Tool (SMART) to monitor ranger activities on the ground. SMART is designed to improve the accountability of rangers for law enforcement activities. The tool can provide information on where patrols have been conducted, their duration, which staff were involved, whether community members joined the patrols, whether any community members were encountered on patrols and the enforcement actions taken in the field (e.g. warning letters, arrests and/or identification of illegal activities). (See full response to [3g](#) in the General Panel Recommendations.)

WWF-Cameroon, with support from WWF-Germany and through a German government funded project, has supported professional development training of rangers at the Garoua Wildlife School and the Southern Africa Wildlife College. Chengeta Wildlife delivered human rights-orientated training for 45 rangers in the

past year (funded by WWF-Germany). Funds originally destined to support law enforcement activities were reallocated towards such training and orchestrating collaboration with the National Commission of Human Rights and Freedom to support the development of the complaint mechanism.

The recruitment of local residents in surveillance teams has taken place in Lobéké and their employment has been budgeted in the current workplan. In Boumba Bek and Nki national parks, local community members, including Baka, are involved as trackers and biomonitors. This involves local communities in park management while also providing additional income opportunities. WWF will look to expand these practices across the other landscapes where it works in south-eastern Cameroon.

Rangers do already distinguish between high-profile/notorious commercial (elephant) poachers and subsistence bushmeat hunting by the Baka. The training and ranger professionalization programmes described above are designed to deepen the professional judgement of rangers in taking proportionate action in responding to the incidents they encounter. While current Cameroonian wildlife law bans the use of metal snares, their use has grown nonetheless as knowledge of traditional snare techniques has diminished. WWF acknowledges that this is an area where sensitization efforts between rangers and Baka communities can reduce conflict, and is acting accordingly.

Recommendation 5. Supporting the complaints procedure. WWF as a whole must provide the necessary financial support for WWF Cameroon in relation to its implementation of WWF's human rights commitments. Among other things, the WWF Network should ensure that the complaints procedure receives sustainable funding that enables it to be extended to Nki National Park. It is also important that the funding for the complaints mechanism is structured such that it is provided to the implementing partners directly, rather than through WWF Cameroon, so as to avoid any perception of WWF exercising control over the mechanism.

The safeguards screening of landscapes – as described in [Section 5a](#) of the General Panel Recommendations – identifies gaps in programme elements, including complaints procedures (grievance mechanisms). For high-risk landscapes (such as those in south-eastern Cameroon), screening outcomes are shared with the CQC, which may make pre-emptive decisions (before detailed mitigation planning) to address obvious deficits, including by addressing funding gaps.

The mitigation framework requires approval from both the country director and an accredited safeguards expert. The resource requirements for effective implementation – including grievance mechanisms – will be addressed prior to sign-off. This is a key requirement within the ESSF.

As described in [Section 7a-d](#) of the General Panel Recommendations, WWF will support grievance mechanisms administered by an independent party for landscapes where the risk or complexity (of community structures) demands it. This will be integrated into project design and budgets through the screening, mitigation and approval processes described above. As the panel report indicates, this structure is already in place in south-eastern Cameroon and serves many (but not all) of the communities that border Lobéké, Boumba Bek, and Nki national parks. Through existing agreements and a new proposal, funding to maintain (and expand) the mechanism will be secured through 2023.

Recommendation 6. Access rights and community participation. The February 2019 MOU on access provides a welcome platform for engagement between the park management and the Baka and local communities. WWF Cameroon should continue to increase its engagement with indigenous peoples and local communities and build on the MOU to ensure that their voice is heard in the governance of the national parks and the community hunting zones around them. In that respect, civil society organizations such as ASBABUK can be vital partners in helping to engage with local residents, but they should not be seen as speaking on their behalf unless it is clear that the communities themselves have so decided.

As Baka use and access zones are delineated, it is critical to ensure that they are accessible to Baka communities around the national parks in accordance with their traditional uses. Requiring written applications from a largely illiterate population is inadequate, as is allowing only hunting of Class [C] animals when Baka have historically depended on Class B animals for a sufficient diet. WWF should make greater efforts to use its leverage, including from higher levels in the organization than WWF Cameroon, to influence the government to recognize and protect the access rights of the Baka in the protected areas now, rather than at some undetermined point in the future.

The February 2019 MOU was a significant step in the recognition of community access rights, and WWF has led on many aspects of its implementation, although COVID-19 (and the related government restrictions) have generated limitations.

Community sensitization missions commenced in August 2019, under the lead of ASBABUK. The WWF Baka community facilitator is ensuring the inclusion of all Baka communities in this process and supports them to express their opinions freely.

The agreed access and usage rules follow a seasonal calendar (a recent example being access to harvest wild mangoes). The Baka do not need permission from park management to access, rather just to inform them of their entry. This is done primarily through a community liaison officer, who is also responsible for relaying any Baka community complaints to park management.

WWF recognizes that implementation of the MOU remains at an early stage with several material aspects requiring further engagement and resolution, including community access to safari hunting zones and conditional permission to hunt Class B animals for subsistence purposes. WWF International and national organizations who fund work in south-eastern Cameroon will support WWF-Cameroon in this negotiation, as the report recommends.

Demonstration of compliance with the terms of the MOU also remains at a preliminary stage but a forthcoming pilot programme will test the potential for community-based surveillance and monitoring activities. This is being run in collaboration with the ExCiteS (Extreme Citizen Science) initiative of University College London.

An external evaluation of the MOU and the steps taken to implement it are currently being conducted by the Forest Peoples Programme at the request of the Sangha Tri-National Trust Fund (FTNS). It will provide feedback on the MOU's impact to date and table a set of recommendations to improve its effectiveness.

Recommendation 7. Monitoring progress. WWF Cameroon should regularly assess progress towards the implementation of the measures it is taking to address human rights in Cameroon. In particular, WWF should engage in continuing analysis to understand the effects of the measures on the local communities, including by tracking the number, type and resolution of complaints, and progress towards protection of rights of access and use, in order to ensure that its actions are effectively protecting human rights in accordance with its commitments. WWF must be more accurate and transparent about the nature of the challenges it faces and its actions to address them, to itself, to its donors, to local stakeholders and the public as a whole. To that end, it should publish regular reports of these assessments.

The steps WWF has taken to improve tracking, management, and the resolution of complaints are detailed in [Section 7a-d](#) of the General Panel Recommendations. The appointment of an ombudsperson will also provide additional oversight (see [Section 7e](#)).

In the case of the complaints mechanism in south-eastern Cameroon, WWF's internal processes are complemented by the independent community complaints mechanism run by two local NGOs and the state's National Commission of Human Rights and Freedom. The latter provides technical support and oversight on monitoring and complaint resolution, including by reporting to government offices, including the presidency of the republic. The National Commission of Human Rights and Freedom is the official body at the national level mandated for investigations in Cameroon; it is recognized as such at the national and international level.

As described in [Section 8c](#) of the General Panel Recommendations, WWF will, at network level, publicly disclose a summary of complaints on an annual basis. To protect confidentiality, this will be at aggregate level with breakdowns by region, type/subject, and status (i.e. open or resolved/closed). The summary may include case studies, provided that all concerned parties have participated in case compilation and agreed to its disclosure. Country offices – such as WWF-Cameroon – will have the discretion to make all or part of the report available in local languages.

Democratic Republic of the Congo: Salonga National Park

Salonga National Park (SNP) lies in the Salonga-Lukenie-Sankuru forest landscape within the central region of the Democratic Republic of the Congo (DRC). The landscape straddles an area of some 10 million hectares. The park covers an area of 3.4 million hectares, making it the largest tropical forest park on the African continent and the third largest protected rainforest in the world. The area is a bastion of biodiversity – a critical habitat for bonobos (an estimated 40% of the remaining world population), forest elephants, Congo Peacock, and other threatened species. It was designated a UNESCO World Heritage site in 1984 and added to the List of World Heritage Sites in Danger in 1999, largely due to widespread elephant poaching.

The Salonga-Lukenie-Sankuru landscape is isolated and sparsely populated, with approximately 280,000 human inhabitants residing in the immediate periphery of the park. Although the population is mostly homogenous, comprised of sub-groups of Mongo (Bantu), there are scattered communities of the Batwa indigenous people. Communities throughout the region engage in agriculture, hunting, fishing, gathering of food, non-timber forest products, and medicinal plants for survival – and therefore have a strong dependency on nature. There are no significant markets within the Salonga landscape and barter is a major component of local transactions. Formal economic activity is limited, primarily consisting of the sale and transport of products, such as bushmeat, to other parts of the country. Most communities now live outside the park, although there are a number of settlements (Kitawalist and Iyaelima) within it. The area outside SNP remains largely under forest cover and, with sustainable community-based natural resource management, could provide for many local needs.

International poaching rings have taken advantage of the decades of violent conflict and political instability in the region. The instability has contributed to the proliferation of arms in the area and to exacerbating widespread poverty. Poaching has reduced forest elephant populations in central Africa by over 60% in the last decade or so. The DRC has been badly affected by rampant poaching for decades and has, at maximum, five viable populations of more than 1,000 elephants each left in the entire country, SNP being the location for one of them. Due to conservation efforts, the estimated population of about 1,600 elephants is stabilizing after decades of steep decline. The DRC is one of the poorest countries in the world, ranking 179th out of 189 countries in the 2019 UN Human Development Index. While the internal and international armed conflicts that have plagued the country since the 1990s have greatly declined since they peaked, there is still violent conflict in some parts of the country, especially in the east.

The landscape's size, remoteness, and lack of infrastructure present additional barriers to the pursuit of sustainable development and conservation.

The agency with responsibility for national parks in the DRC is the Institut Congolais pour la Conservation de la Nature (ICCN), which is a public enterprise under the supervision of the Ministry of Environment and Sustainable Development. DRC law prohibits most activities in national parks and other protected areas, including bringing firearms and other hunting weapons within park boundaries; fishing of any kind; hunting or killing any wildlife except in self-defence; and constructing houses, farms, and sheds.

Despite the challenges, conservation and socio-economic development efforts led by WWF in conjunction with numerous local and international partners have delivered tangible results for local people. WWF has worked in the DRC since the mid-1980s and in Salonga since 2003. In partnership with ISCO, OXFAM and others, WWF has supported efforts to foster the livelihoods of communities based on the improvement of agricultural techniques, market access, strengthening of community governance structures, and the creation of value chains. WWF-DRC has supported the following socio-economic development activities within communities living in the landscape:

- A key focus recently has been on social forestry and providing tenure and securing access rights for forest-dwelling communities through the designation of community concessions, permitted under new national legislation, supported by the government, WWF, public donors, and other conservation organizations. WWF has started work with communities countrywide to establish community concessions, where rights have been transferred. Forty such concessions have been created across the DRC, of which six are in Salonga. The six cover an area of 173,000 hectares. A further three concessions for BaTwa people are in the process of being created and would add another 14,000 hectares to the area of the community concessions in the Salonga landscape.
- Another key focus has been conservation agriculture – measures to intensify farming as an alternative to slash and burn cropping, mainly by supporting farmer field schools and pilot farms, facilitating market access, and setting up seed banks and nurseries. WWF investment helped train and support over 14,000 farmers over just the past three years, and helped build 11 storage facilities for agricultural products and purchase grain mills, oil presses, and rice huskers. Over 400 tonnes of local agricultural products have been transported and marketed elsewhere, including in the capital Kinshasa, benefiting local producers.
- There has recently been an investment in strengthening the livelihoods of fishers, including through investments in smoking and curing facilities. WWF worked with partners to address fisheries governance through the development of a co-management protocol for the Luilaka River (the border river of SNP) to which ICCN and the local platform of fisher peoples are parties.
- WWF has helped support the establishment of 499 local development committees, farmer organizations, and coffee producer associations.
- Given the weak presence of the government in the Salonga landscape, WWF and its development partners are providing services that should ordinarily be provided by the state. For example, WWF has supported the development of two community health centres for BaTwa, supported micro-enterprises (e.g. soap making), and invested in literacy education for BaTwa people (as part of a larger literacy drive, but with access to the courses available disproportionately to BaTwa communities as a share of the population, due to historic limitations on their access to education). This work has also included the maintenance of over 185km of roads and repair of 55 bridges within the landscape – critical for fostering sustainable livelihoods. Over the years, WWF-implemented programmes have supported the construction of schools and healthcare facilities, water and sanitation infrastructure, and a community radio station.

In 2005, WWF hired a park advisor to work with ICCN, the government entity responsible for law enforcement in the park, on training and anti-poaching. After completing an assessment, WWF began providing support to ICCN-employed park rangers, also referred to as ecoguards. In December 2009, in response to concerns about human rights abuses and threats to our staff in SNP by some ecoguards, WWF

stopped all activities in SNP. WWF resumed activities only after the park's warden was changed and the accused ecoguards were removed. Between 2010 and 2012, it became increasingly clear that the current ICCN strategy and resources, even with support from WWF and other partners, were insufficient to improve park management, deliver inclusive conservation approaches, minimize the risk of human rights abuses, or properly address the poaching crisis. WWF faced a choice: withdraw from the area entirely or increase its role in the park. WWF International consulted widely in considering the different options. Ultimately, given the needs of local communities and the global significance of Salonga for conservation, reflected by its status as a UNESCO World Heritage site, WWF International decided to redouble efforts.

After several years of negotiations, in August 2015 WWF International signed an agreement with ICCN to co-manage SNP, which went into effect in October 2016. Under the terms of the agreement, ICCN remains responsible for the ecoguards and law enforcement, as required under Congolese law. WWF is not involved in the command of the roughly 300 ecoguards, as they are government staff. WWF's role in this regard is to work with ICCN to reform enforcement practices, build capacity, and strengthen the participation of local communities in park conservation activities. WWF exercised agency to reduce the military presence in the region; the military no longer plays a role in park management, and joint patrols between the military and rangers have been discontinued.

SNP was established as the Tshuapa National Park in 1956 and expanded to its present boundaries in 1970. The initial creation of the park and the expansion in 1970 each resulted in the relocation of people to areas outside the park, which has led to conflicts over land and resources, due in part to ambiguous policies on resource use in the park and bordering rivers; declining resources outside the park; a negative perception of anti-poaching activities; and, potentially, uncertainty regarding the park's boundaries.

These conflicts over land ownership and resource access have simmered – and at times boiled over into violence – over the years. Some communities (Iyaelima in the southern block) remained in the park after its creation. Conflicts have been exacerbated by the general context of armed conflict in the DRC, with, at times, armed militia taking up residence in the park. These militias survived and funded themselves by poaching elephants for ivory and appropriating resources from local communities.

The panel has stated that “there are systemic problems in relation to the park and ecoguards that are not easy to solve, some of which are beyond WWF's control.”

Weak governance, poor infrastructure and government services, the remoteness of the landscape, and other factors make Salonga a particularly complex environment in which to operate and to ensure full state protection of human rights. WWF is in discussion with the DRC government on the terms under which WWF could continue as a conservation partner in SNP. Our engagement is conditioned on agreement to operationalize protections for human rights, including demonstrated commitment to systemic changes that would ensure that human rights are given highest priority. At the core of these discussions is a series of principles that underpin negotiations for a new partnership agreement between WWF and ICCN. We have further developed a proposed pathway to work with ICCN and others to meet these principles and continue efforts to safeguard the people in the landscape.

For many years, WWF has been taking a number of steps on the ground with respect to human rights and has responded to known allegations to the best of its ability given the complex relationship with the government in connection to these issues. WWF recognizes that these complexities drive the need for collaboration between in-country conservation organizations, donors, and human rights organizations to press the government to adopt strong protections for human rights. WWF has urged the parks authority to hold a symposium on human rights to discuss the actions it should take to increase protections across the country. ICCN has agreed to this, and funding is being pursued. (Due to the COVID-19 pandemic, this symposium is unlikely to occur until 2021.) In addition, WWF has strongly supported the donor community's request for ICCN to establish, within its organizational structure, a directorate responsible for human rights

that will institutionalize the implementation of human rights protections. Finally, WWF will work in Salonga with a human rights partner on establishing a complaints mechanism modelled on the successful approach taken in the Central African Republic. This will give communities access to channels through which they can raise grievances and seek redress. A local human rights entity is being selected as the partner for this effort. WWF will focus its efforts on community-based natural resource management, livelihood generation, governance, biodiversity monitoring, and wildlife management. A third-party entity will be responsible for working with ICCN to professionalize law enforcement.

Specifically, WWF's readiness to continue operations in Salonga is predicated on the ability to reach agreement with ICCN on the following:

- a. Agreement to fully implement E&S safeguards, as laid out in WWF's ESSF, including provisions governing community health and security, involuntary resettlement and access restrictions, indigenous peoples and the conservation of natural habitats;
- b. Operationalization of a partnership with a human rights organization active in DRC to work with ICCN, WWF and other partners to embed rights-based approaches to conservation and sustainable development activities;
- c. Establishment of an independent grievance mechanism accessible to communities across the landscape;
- d. Agreement and measures to undertake conflict mediation where human rights allegations have surfaced;
- e. Continuing to foster inclusive, community-centred conservation that meets the needs of local people and engages them as primary stake- and rights-holders in conservation;
- f. A model for law enforcement activities undertaken by ICCN, that fully respects human rights and meets WWF's safeguards requirements on support to ecoguards (as per the [Principles Regarding WWF's Support for Enforcement and Rangers included in the Standard on Community Health, Safety and Security](#)). Support for implementation will be provided by a third party that will become part of the partnership agreement with ICCN, WWF and a human rights organization, each with their own spheres of responsibilities;
- g. Clarity with ICCN regarding the processes and procedures to be invoked to immediately address human rights violations by park staff, investigate allegations and seek prosecutions as warranted;
- h. Annual reviews to ensure that the agreed safeguard measures are being effectively implemented.

All of the above will be underpinned by ongoing support for community eco-development, integrating conservation in the fields of natural resource use, agriculture, fisheries, and social infrastructure, as WWF has done for years.

WWF will address the specific recommendations from the panel in the following manner, subject to the above conditions being agreed with ICCN.

Recommendation 1. A code of conduct and training ecoguards in human rights. WWF should make clear that signing and implementing the code of conduct, which it first proposed four years ago, is a minimum requirement for it to continue to support the ecoguards. It should also continue and accelerate human rights training. WWF should recognize that by themselves, these steps will not be enough to solve the problem.

A conduct guide for ecoguards (officially called "Applicable Guidance and its 100 lines for Ecoguards and other technical personnel of the Salonga National Park") has been developed. While formally endorsed by ICCN in August 2020, the guide has been in use since December 2019 when it was incorporated into training activities. The guide applies to all government personnel responsible for law enforcement and lays out their

responsibilities for upholding human rights, with special regard to the rights of indigenous peoples, and for conducting their operations lawfully. Key points include:

- The Congolese state is civilly responsible for the actions of ecoguards;
- Ecoguards must avoid any discrimination based on race, sex, religion, ethnicity, and political or philosophical convictions;
- Any use of force by ecoguards must be limited to self-defence and must be proportional to the threat. The use of a weapon must be a last resort;
- The ecoguard, as judicial police officer, must inform any arrested person of the reason for the arrest and their right of access to justice;
- Ecoguards must maintain peace and social cohesion in all relations with local communities;
- The guide has been translated into Lingala, the language spoken by most ecoguards and surrounding communities.

With support from German funders, an ICCN-wide training curriculum has been developed and applies to ecoguards across the DRC. One module focuses specifically on human rights and includes the definition of human rights; the importance of human rights; its application in the work of ecoguards; regulations on cruel, inhuman and degrading treatment and detention; and the treatment of women, children and the elderly. The new curriculum has been further detailed and operationalized in a training programme at the park level and is being applied in future training.

Recommendation 2. Monitoring of ecoguards. WWF should establish a system of monitoring of ecoguard patrols, which could include independent observers accompanying as many patrols as possible, GPS tracking and regular debriefing of the patrols and the independent observers. WWF should not rely on ICCN to inform it of problems.

Ecoguards in Salonga are government employees and are accountable to ICCN. Going forward, a third-party entity will be responsible for professionalizing law enforcement and will become part of the partnership agreement with ICCN, WWF, and a human rights organization. The entity will advise ICCN, develop capacity, support training, monitor patrols, plan deployments, participate in debriefs, promote the highest international standards and good international practices, and adopt other strategies to improve both the efficacy of law enforcement and human rights protections.

WWF has supported the deployment of the [Spatial Monitoring and Reporting Tool \(SMART\)](#) to monitor ranger activities on the ground. SMART is designed to improve accountability of rangers for law enforcement activities. The tool can provide information on where patrols have been conducted, their duration, which staff were involved, whether community members joined the patrols, whether any community members were encountered on patrols, and the enforcement actions taken in the field. (See full response to General Panel [Recommendation 3g.](#))

Recommendation 3. Independent complaints mechanism. WWF should accelerate the introduction of an effective complaints mechanism. It should ensure that the mechanism meets the requirements described in Chapter 3, including transparency, accountability and independence, and that it is able to provide legal, technical and financial support to victims. The mechanism should be administered by a human rights civil society organization, ideally modelled on the Human Rights Centre in the Central African Republic, and WWF should ensure that it is sustainably funded. Given the size of the Salonga area, it will be necessary to have multiple offices and ways of interacting with isolated communities.

WWF is actively working to establish a transparent, accountable, independent complaints mechanism administered by a local human rights partner. The design of this complaints mechanism has been modelled after proven examples, including the Human Rights Centre in the Central African Republic, and informed by

good international practices and recommendations from human rights organizations. The first community consultations for the mechanism were initiated but then interrupted by the COVID-19 pandemic.

The complaints mechanism is foundational to work in Salonga and is a pre-condition for continuing in this landscape. Proposals to fund the mechanism are in development, and they include support for learning exchanges between operational complaint mechanisms throughout the Congo Basin to develop good practice guidelines.

As per WWF's ESSF, the complaints mechanism will be further reviewed through additional community consultations and public disclosure.

Recommendation 4. Instituting a system to investigate allegations and punish abuses. It is evident that the UGPNS lacks a reliable system for responding to allegations of abuse and referring them to the authorities for investigation and resolution, and that the Military Auditors lack the resources or will to conduct investigations in many cases. WWF should ensure that the UGPNS establishes and implements a procedure that provides for: suspension of ecoguards against whom credible allegations are raised (including through the independent complaints mechanism); independent investigation of allegations; remedies to victims; and disciplinary punishments by the park management itself, including, as appropriate, suspension, termination and referral for criminal prosecution. WWF should conduct inquiries to establish whether the Military Auditors of other provinces with jurisdiction over the Salonga region have also dealt with cases involving ecoguards. WWF should also continue to work with partners such as CODHOD to support the Military Auditors to develop the necessary capacity to conduct investigations and prosecute cases involving ecoguards.

ICCN already has a formal staff regulation with defined articles governing the suspension and dismissal of staff on the grounds of misconduct. This system needs to be further strengthened. WWF, working with other conservation organizations and donors, will use its agency to petition ICCN to strengthen these rules, regulations, and accompanying implementation systems. Recognizing that this needs to be a countrywide undertaking covering ICCN systems as a whole and cannot reasonably be addressed through a discreet intervention in one park, ICCN's new human rights director will need to play a critical role in operationalizing this system.

Beyond strengthening disciplinary recourse systems, WWF is pressing ICCN to take additional actions, including:

- Better due diligence screening of all ecoguards employed in Salonga, particularly those coming from other sites, to verify they have acceptable records of behaviour and professional conduct;
- Increase the proportion of female ecoguards and ecoguards from indigenous communities in Salonga's teams.

Responsibility for investigating and prosecuting unlawful actions by ecoguards lies with the DRC state. There is a broad need to strengthen access to justice and redress in remote areas of the country, including Salonga. This too needs to be a countrywide undertaking conducted by ICCN through its human rights directorate. It will require establishing policies and procedures, building capacity, and providing training in human rights for all state actors functionally responsible for ensuring justice. As part of a coalition with other NGOs and donors, WWF will help support ICCN's work in this area.

WWF continues to work with human rights groups in the DRC and has shortlisted candidate human rights partners as per the Central African Republic's Dzanga-Sangha model, as the panel suggests, to support ICCN in carrying out its state obligations in Salonga.

Recommendation 5. Access rights and community participation. All of the investigations highlighted that an underlying cause of the conflicts between ecoguards and local communities is the restriction on access to the national park for subsistence hunting, fishing and gathering of non-timber forest products. Developing community forests is worthwhile and should continue, but through its role in park management and its engagement with ICCN, WWF should also influence the planning and zoning of the area to clarify boundaries and establish zones of community access and use in and around the park, in order to reflect customary rights and accommodate local needs. Measures should also be taken to sensitize local communities and ecoguards to the boundaries and local rights. It is critical that WWF and UGPNS include the local communities in these processes, including through participatory zoning and community mapping.

The area outside SNP remains under forest cover and, with sustainable community-based natural resource management, could provide for many local needs. As WWF continues to support the transfer of tenure and use rights to communities for these lands, it also will seek to build capacity for community-led natural resource management. The principles guiding negotiations for a new MOU with ICCN, listed above, include several points to support this commitment, such as the operationalization of new participatory governance structures with strong representation by local communities, support for the self-organization of communities, the transfer of tenure and access rights to local communities for community forests, and ensuring FPIC in the case of indigenous peoples, among other principles.

Under DRC law, national parks cannot be accessed for consumptive use. WWF seeks to open a dialogue with ICCN/the national government towards establishing special provisions for access to national parks by indigenous groups and local communities for sustainable use and subsistence activities, learning from successful examples in other Congo Basin countries, such as the agreement between the government of Cameroon and indigenous Baka people on access to natural resources in several of the country's parks.

WWF has pressed for a human rights symposium to discuss the actions required to increase protections across DRC, which would include many of the topics proposed in the panel's recommendation. The government has agreed to the symposium, but due to COVID-19, it is unlikely to occur until 2021.

Annual reviews will be conducted to ensure that the agreed safeguard measures are being effectively implemented.

Recommendation 6. Relocation of villages within the national park. Although the situation of the villages inside Salonga National Park was not the subject of this inquiry, WWF must make absolutely clear that, consistent with its policies on relocation of indigenous peoples and the recommendations of the World Heritage Committee, it will not support, and will oppose, any involuntary relocation of these villages. To that end, WWF should ensure that there is a credible independent body conducting the process to determine whether the communities give their free, prior and informed consent to any relocation.

WWF will not support, and will oppose, involuntary relocation, consistent with our social policies and the ESSF.

Recommendation 7. Influence and leverage. WWF obviously cannot control government authorities, including ICCN, but it does have leverage that it can bring to bear. It should make clear when and why it will use that leverage to push for systemic changes. A key point of leverage is the negotiation of the new MOU for the national park, which must clearly set out the respective roles and responsibilities of WWF and ICCN, and WWF's conditions and red lines for continued support. WWF should make clear that it cannot continue to provide support for the ecoguards without effective mechanisms in place to monitor their behaviour, investigate allegations fully and ensure appropriate disciplinary measures for confirmed cases of abuse.

We have sought to use our leverage and increase our influence, including by:

- Pressing the parks authority to hold a symposium on human rights to discuss the actions it should take to increase protections across the country. The government has agreed to this, and funding is being pursued.
- Strongly supporting the donor community's request of ICCN to establish a directorate responsible for human rights within its institutional structure.
- Pressing for the partnership between ICCN and a third-party entity to take responsibility for the professionalization of law enforcement in SNP.
- Securing a human rights partner to establish complaints mechanisms modelled after the successful approach adopted in the Central African Republic. This will give communities access to channels to raise grievances and seek redress.
- Continuing to support the transfer of tenure rights to communities and to build capacity for community-led natural resource management.
- Opening dialogues with ICCN and the national government towards establishing special provisions for access by indigenous groups and local communities for sustainable use and subsistence activities.

There is a general recognition of the need to improve conditions in the DRC. The protection of human rights is a responsibility of the state. While WWF will press for improvements in rights protection and access to justice, we recognize that we cannot achieve this alone. A consortium of actors – including the government of DRC, the United Nations, donor governments, and other conservation and development organizations – is needed to affect change. As an individual organization, we have identified the conditions upon which we could continue to work with ICCN, as outlined above.

Central African Republic: Dzanga-Sangha protected areas

The Dzanga-Sangha Complex of Protected Areas (DSCPA) is a 460,000-hectare protected area located in the south-western corner of the Central African Republic (CAR), in the Yobé-Sangha Prefecture. Established in 1990 by the CAR government and WWF, the DSCPA encompasses a community hunting area, the Dzanga-Sangha Special Reserve, and Dzanga Ndoki National Park (demarcated into two sectors, Dzanga Park and Ndoki Park). The DSCPA contains the largest intact forest block remaining in the CAR. Together with Lobéké National Park in Cameroon and Nouabalé-Ndoki National Park in the Republic of Congo, the DSCPA forms part of the 2.5 million hectare Sangha River Trinational Landscape. In 2012, UNESCO designated the Sangha River Trinational Landscape a World Heritage Site. The DSCPA is a stronghold of the vulnerable African forest elephant and other iconic and threatened Congolese wildlife, including the endangered western lowland gorilla.

CAR has struggled with periodic conflict and civil strife. There have been two violent coups in the last 30 years, in 1995 and 2013, in addition to other failed attempts. In 2016, President Faustin-Archange Touadéra was elected, but in the years that followed, he has struggled to bring stability beyond the capital city of Bangui. Even in Bangui, where the security situation is less volatile, criminal and militia activity remains an

obstacle to strong governance. In February 2019, the CAR government signed a peace agreement with the largest armed groups in the country and successfully formed a new unity government. Nevertheless, the major drivers of conflict – competition for control of territory and natural resources like diamonds and timber – persist. As a result, many armed groups still operate inside the country and the prospect for meaningful improvements to the security situation remains bleak.

Despite ongoing turmoil, the DSCPA continues to enjoy relative peace and stability. As of November 2020, Dzanga Sangha remains the only safe area (green zone) that the UN recognizes in CAR outside of the capital. The primary reasons for the markedly different security situation in the DSCPA are the presence of a professional, trained ranger force and the protected area's critical role in bolstering the local economy. That said, the DSCPA has not been wholly immune to the conflict that has engulfed the nation:

- In 1995, during the same month that the Doli Lodge officially opened in a bid to attract tourists to Dzanga Sangha (and after the habituation of primates had already begun), a mutiny in the armed forces sparked a wave of violent conflict, which had a significant negative impact on tourism.
- In 2008, the global financial crisis negatively impacted the operations of forestry companies in the DSCPA, leading to a loss of employment opportunities for local communities. The financial crisis also triggered a drop in international donor funding, resulting in the termination of some projects. Some communities lost trust in their NGO partners and soured on support for conservation.
- Around the same time, there was a sharp increase in the number of poaching incursions into Lobéké. Elephant deaths rose as external ivory poaching gangs became more active.
- In 2013, a militia from South Sudan entered Dzanga Sangha and poached 26 elephants for their ivory. The incident garnered international attention and led to a ramping up of security. That same year, militia groups raided the DSCPA headquarters and WWF offices to steal surveillance equipment. Weapons poured into the DSCPA. Security concerns forced all international WWF staff, except for one individual from Cameroon, to leave Dzanga Sanga for over six months.

The Ba'Aka, a traditionally nomadic people, have inhabited the area that now encompasses the DSCPA for centuries. When settlers from outside the region arrived and established communities, they treated the Ba'Aka as second-class citizens, denying them access to birth certificates, voting, education, institutional medical care, and legal recourse against mistreatment. Some of this discrimination persists to this day.

WWF saw the creation of the DSCPA not just as a powerful mechanism for conserving the area's diverse ecosystems and wildlife, but also as an opportunity to help the historically mistreated Ba'Aka people have a greater voice in the management of their land and resources. Local communities partnered with WWF and the government from the outset and have played a key role in decision-making and planning ever since. This close collaboration produced several WWF-supported programmes in the DSCPA dedicated to fostering traditional Ba'Aka ways of life and supporting sustainable development in their communities, as well as legal services for those who want them. Furthermore, after the creation of the DSCPA, the first minister of water and forest established a policy to locally retain 90% of the revenue generated from the park, with 50% dedicated to park management and 40% reserved for local communities.

WWF's work in Dzanga Sangha also ensured that traditionally disadvantaged voices were heard – that there was a place and a process to air and resolve conflicts on an even playing field. For many years, this work in Dzanga Sangha (and in many other WWF projects) was largely informal. But in 2016, in partnership with the Human Rights Centre and Ba'Aka community association, that system – known as a conflict resolution and grievance system – was formalized and has become a model for how to ensure all people have a path to justice and a voice when things go wrong, particularly in high-risk areas. The centre is staffed by a lawyer, a deputy community liaison, and 26 village monitors, 85% of whom are Ba'Aka.

WWF has invested heavily in supporting community livelihoods over the years. Amongst other things, this work has included:

- Support in registering over 500 birth certificates for indigenous Ba'Aka children, who otherwise could be denied basic citizenship rights, such as the ability to attend school, get a paying job, vote, or run for office.
- Free medical services provided to Ba'Aka community members at a newly built (and WWF supported) hospital. There is also a mobile medical service that travels to remote Ba'Aka encampments to provide inoculations and medical services as needed, as well as to bring specialists to treat complicated cases. Of the 15,000 medical consultations conducted between January 2018 and June 2019, more than 61% were with Ba'Aka members.
- Designation of 686,000 hectare Dzanga-Sangha Special Reserve as a mixed-use area within the DSCPA that allows for Ba'Aka communities and others to hunt, forage for forest products, and engage in other traditional practices.
- Construction of two school residences in Bayanga in 2016, one for boys and one for girls, together with CAR government authorities. WWF funding also supplies teaching materials to primary schools in the DSCPA and covered 2019 school fees for 758 Ba'Aka students and the 2019 salaries of 34 teachers. As a result, more than 1,300 students were able to attend school that year.

The panel concluded “that there were no human rights abuses here for which WWF bears responsibility and applauds the quick actions taken by WWF to do what it could to protect the park”.

The panel has provided two recommendations, listed below with WWF's response.

Recommendation 1. Training of Ecoguards With respect to third-party training for ecoguards, the Panel recommends that (a) sensitization about human rights and indigenous peoples' rights should be integrated into training programmes; (b) that such training should be pursuant to and consistent with WWF's social policies; and (c) that there should be greater guidance on this from WWF International.

The sensitization of human rights and indigenous people has been part of the third-party training for ecoguards. We look forward to improving that by engaging our WWF International safeguards experts and employing good international practices shared in network communities (e.g. SD4C, E&S Safeguards Practitioners Group).

Recommendation 2. Supporting Human Rights WWF should continue to support the viability of the Human Rights Centre as an independent organisation, ideally in a way that allows it to move beyond financial dependence on WWF.

We agree that the Human Rights Centre is a model we want to support and share with others. Our medium-term vision is to guarantee sustainable funding through the FTNS Trust Fund (the Sangha Tri-Nationale Foundation) and over the long-term incorporate the Human Rights Centre into the Dzanga Foundation, which is yet to be created as an independent governance body.

Republic of Congo:

Messok Dja

Espace TRIDOM Interzone Congo (ETIC) is a conservation programme of the Ministry of Forest Economy and Rural Development and WWF that covers 2.1 million hectares in the northern part of the Republic of Congo (ROC) on the border with Cameroon. Messok Dja is a forested area within ETIC of nearly 150,000 hectares that has been proposed for designation as a protected area by the government. WWF has been involved, focusing on empowering local communities to engage in the process and obtain their FPIC and maximizing conservation outcomes whether or not a protected area designation materializes.

The biologically rich Messok Dja forest is home to endangered forest elephants, western lowland gorillas, and chimpanzees, and is a key animal migration corridor between Cameroon and the ROC. Over the past 10 years, forest elephants have declined by more than 60% globally, largely due to the poaching crisis, but conservation efforts in Messok Dja have protected local populations. Biological surveys done by WWF show that populations of elephants and great apes within Messok Dja are relatively stable, in contrast to nearby areas. The forests nonetheless face pressure from industrial logging and mining.

The Messok Dja forests span two government-allocated logging concessions operated by SEFYD (China) and SIFCO (Lebanon). When these concessions were awarded in 2005 and 2008, Congolese law did not require FPIC, and no logging concession in the Congo Basin has been conditional on FPIC. Under Congolese law, these companies are required to set aside part of their concessions as a conserved area – effectively given protected status – and to negotiate with communities to define access. In 2011, the Messok Dja forest was identified as a zone of interest, based on surveys and inventories carried out by the government and WWF during two workshops held under the government’s National Land Use Planning initiative. In 2012, the ROC government proposed designating Messok Dja as a protected area. Understanding that there are several forms of legal forest protections in the ROC, and to confirm that local community rights were respected, WWF successfully advocated that the government pursue a full FPIC process before any gazettelement, and to keep the government’s policy options open to pursuing types of protections that permitted community access.

WWF supported FPIC consultations and processes without prejudice as to the final outcome on conservation designation. WWF and a local NGO consortium worked with communities to build an understanding of the five conservation options that ROC law currently allows. WWF hopes that the FPIC process will lead to an agreement between stakeholders that allows for effective inclusion of communities in protected area management, including a change in law if needed.

When WWF hired an independent organization to evaluate progress, it was clear the communities were not clear on the options, and some groups held fears about the potential loss of access rights to the forest. The government, with support from WWF, took stock of the process at the end of 2019 and held a series of workshops with communities (including 95% of the communities who could be impacted by the conservation area). As a result, confidence in the process increased. In July 2019, a legal provision was published that made FPIC mandatory for specific projects, including the establishment of protected areas. The responsibility for FPIC was placed on the Ministry of Justice, and, as a result, the government took over leadership of the FPIC process. WWF pivoted to a supporting role, focusing on strengthening local consultations. WWF also anticipates participating in the commission that will be established by the government to oversee the FPIC process.

Additionally, WWF has invested in community development activities, including:

- Establishing a multi-stakeholder platform for natural resource management and governance around Messok Dja. It is composed of local communities, indigenous peoples, members of the private sector, and government representatives. The platform decides and implements the activities with the support of the community team of the ETIC project. It also includes a community-led complaints system.
- Supporting education efforts, including building or renovating schools, providing school materials to local students (including Baka children), funding teachers, and leading educational awareness programmes.
- Establishing a community insurance system for human-wildlife conflict, which pays participating farmers for damages incurred to property by animals, in particular elephants and great apes.

WWF also supports the government in anti-poaching efforts, including efforts to train and retrain ecoguards on human rights obligations as codified in Congolese law. In October 2018, the ETIC programme developed a

code of conduct for ecoguards, which is being drawn upon by the ministry to develop a national code of conduct for ecoguards throughout the ROC. While waiting for the government to formally approve and adopt the national code of conduct, ETIC integrated the key elements into its internal regulations, which have been in force since July 2020.

ETIC also established a grievance mechanism coordinated by a community outreach officer, who is tasked with investigating, documenting, and tracking complaints against ecoguards. The complaints mechanism in ETIC was amended and validated by the official multi-stakeholder platform, which oversees and decides upon procedures relating to complaints management. Discussions have also begun with civil society organizations, in particular local NGOs, to support the platform in implementing the complaints mechanism.

The panel emphasizes that Messok Dja is currently subject to logging concessions and mining exploration permits that place indigenous people, local communities, and ecosystems at risk. Further, they “strongly encourage WWF to work together with indigenous peoples and local communities in this challenging environment to protect biodiversity as well as human rights in the Messok Dja area.”

The panel has provided further detailed recommendations, listed below together with WWF’s response.

Recommendation 1. Code of conduct and disciplinary consequences for ecoguards. WWF must make clear that adoption and effective implementation of the code of conduct are prerequisites for its continued provision of support to ecoguards. WWF ROC must ensure, including through its participation in the ETIC disciplinary committee, that appropriate investigation and review of allegations and sanctions for misconduct are carried out, including the referral of criminal cases to local prosecutors.

In 2018, the draft code of conduct and complementary internal ETIC rules were embraced by ETIC as guidelines for the government ecoguards, and as indicated above, in 2020 the provisions of the code of conduct were incorporated into these guidelines. They include guidance on the prevention of misconduct, corruption, and discrimination; ensuring ethical behaviour; good local community engagement; and respect for indigenous and human rights. Breaches are grounds for disciplinary action, including dismissal, by the government-appointed ETIC coordinator who supervises and has hire/fire power over ecoguards. Since 2018, 10 ecoguards have been dismissed based on violations of the ETIC internal rules.

The government is using ETIC’s draft code of conduct as a model to develop a mandatory national code of conduct.

Additional trainings for ecoguards on human rights have been delivered and will continue in line with the national curriculum (see 3 below on Training).

[Section 3a](#) of the General Panel Recommendations provides further detail on the Principles on Enforcement and Rangers that WWF has developed as part of the E&S Safeguard Standard 7 on *Community Health, Safety and Security*. We are grateful for the panel’s acknowledgment of this being a good starting point for specifying WWF’s human rights commitments in relation to law enforcement.

Recommendation 2. Revising the MOU. WWF ROC should work towards a revised MOU that fully reflects its human rights responsibilities, commitments and expectations, including expectations for ecoguard behaviour and consequences for misconduct, as a prerequisite for its continued partnership with the government.

The five year “Protocol d’accord” between WWF and the ROC government for work in ETIC is up for renewal in February 2021. WWF senior regional management and the WWF International legal team are

collaborating to ensure that E&S safeguard and human rights conditionalities are fully represented in the next accord.

Recommendation 3. Preventing abuses on patrols. WWF ROC should build on its initiatives to have independent observers accompanying ecoguard patrols and to carefully document arrests and interrogations with lawyers present. More generally, WWF should ensure that the ecoguards distinguish between poaching of endangered species such as elephants and the traditional subsistence activities of the Baka – activities that they have not given their free, prior and informed consent to restrict and that should not be criminalized. This distinction should be reinforced through training, including where possible of the USLAB ecoguards, and through the complaints mechanism and disciplinary reviews. In addition, the system of bonuses should be rethought to ensure that it does not result in unnecessary conflicts between ecoguards and local residents, especially indigenous peoples. The UNDP SECU report found that the quantitative indicators used to measure the success of the ETIC programme did not refer to the special relationship of the Baka to their traditional resources, and as a result were likely to incentivize penalizing the easiest targets. Providing ecoguards with bonuses for arrests and seizures encourages them to make as many arrests and seizures as they can, and may have little impact on the higher-level directors of poaching.

Better oversight of ecoguard patrols

From early 2020, ETIC has used five Garmin inReach GPS communicators to track and communicate with patrols as part of SMART surveillance (that was introduced in 2014). A SMART focal point produces reports and manages a patrol control room (which is currently being upgraded to improve real-time remote monitoring of patrols). From July 2019, ETIC also recruited observers to accompany rangers' patrols. ETIC is piloting the use of body cameras to document arrests, and subsequent analyses shapes capacity building and ranger training.

Documentation/due process on arrests

WWF provides technical support to the Congolese police to improve quality control of formal police reports. WWF has hired a technical advisor on law enforcement and judicial assistance to focus on the ETIC programme and whose activities include working with the Ministry of Justice, along with other large conservation organizations, to ensure due process in arrests. For major arrests, a local law firm is hired by the ETIC programme to assist with prosecution processes. Between 2015 and 2019, the technical advisor visited the Ouessou prison to confirm that poachers arrested within ETIC were not maltreated and were in good health. In 2019, when the prison director stopped permitting visitors, the technical advisor started to work with lawyers to regularly call the prison and monitor the prisoners' conditions. The Wildlife Crime Unit (WCU) within the WWF Congo programme developed in early 2020 a training manual on the compliance with criminal procedures and human rights.

Bonus protocols

At the request and on behalf of the government, the WWF WCU Team developed a manual of procedures for bonus payments, under the ETIC coordinator's oversight. In effect at ETIC since June 2018, it includes a bonus system that rewards the good behaviour of rangers. The bonus payment protocols were further formalized in a manual drawn up and validated by the ETIC coordinator in July 2020. The payment criteria for bonuses are clearly indicated and designed to not unfairly criminalize indigenous and local communities. The manual's impact will be routinely reviewed and amended to address any unwanted or unintended consequences from implementation.

Bonuses are dependent on the type of confiscation and follow up of the arrests. For example, if the seizure is ivory, or weapons used for elephant poaching, ecoguards receive a fixed amount depending on the quantity of ivory or type of gun. These bonuses are provided directly to ecoguards after the seizures are registered at headquarters. This system is designed to incentivize ecoguards to confiscate strictly illegal materials and limit opportunities for corruption. If arrests are made, a bonus is only paid once the government officials

(ETIC coordinator/police) deem the infraction of a level that warrants referral of the suspect to the judicial authorities. If the government officials do not deem the arrest sufficient to go to court, the suspect is released and the ecoguards do not get the bonus for the arrest. This ensures that bonuses do not motivate ecoguards to make arrests without a justified cause.

Collaboration with USLAB

USLAB are government-hired ecoguard teams engaged by the private concessions. Neither WWF nor the ETIC coordination team have any formal cooperation agreement with them. As noted below, USLAB personnel are receiving the same form of foundational training as the ETIC ecoguards, and if issues arise – for example, through the grievance mechanism – the government and their contracting parties are informed so they can follow up.

Training

Since February 2020, a national curriculum for induction and refresher training of ecoguards in the ROC has been in force. This was jointly developed by the government, WWF, and other conservation organizations. This curriculum consists of 145+ hours of training that includes ethics, good conduct, community engagement, appropriate use of force and human rights. This curriculum is also available to USLAB ecoguards. WWF provides input into the design of new training for ecoguards, with special attention paid to the challenges posed by strict legal codes, and to sensitizing communities on their rights and on the restrictions imposed by national law.

Recommendation 4. Improving the complaints mechanism. WWF should commit to ensuring that allegations concerning the ETIC ecoguards and, as far as possible, the USLAB ecoguards will be received and reviewed by an independent body that is able to find appropriate remedies. WWF should also work to provide sustainable support for an appropriate civil society organization able to carry out this function, along with more general support to indigenous peoples and local communities, as the organization has done in the Central African Republic and Cameroon.

WWF will use the experiences from similar work by WWF in Cameroon and CAR for independent monitoring of complaints. The grievance mechanism is currently coordinated by the ETIC community liaison unit, which includes WWF and ETIC staff. Complaints resolution is overseen by a local committee, which includes local authorities and community members.

Statutes were finalized in December 2019 for a new multi-stakeholder platform, composed of delegates from local communities (21), local government (8), and local CSOs (3), as well as ETIC, government, and private industry representatives. The platform is tasked with discussing and finding solutions to issues, such as human-wildlife conflict, ecoguard abuses, and livelihood impacts. Through a technical group (and therefore without sanctioning authority), the platform will seek resolution of issues arising via the grievance mechanism and suggest ways for the mechanism to improve and expand as experience is gained. The ETIC community liaison officer informs the ETIC coordinator, who is a government official and has sanctioning authority over the ecoguards, of the platform's outcomes.

In addition, discussions are underway with a local NGO partner about possible independent support for the complaints system. We are awaiting their proposal.

Recommendation 5. Building on its engagement with indigenous peoples and local communities. WWF ROC should do more to involve local communities in conservation strategies, including anti-poaching strategies, by including them in the development and implementation of the ETIC management plan. To that end, they should hire a staff member with expertise in social policies and indigenous rights, preferably a member of the Baka people familiar with local conditions, and seek to partner with local civil society organizations working on human rights.

WWF continues to build engagement with local and regional human rights and indigenous organizations. Examples include:

- Engaging the organization that headed the consortium on FPIC on a new collaboration on improving participation and integrating views of indigenous and local communities in the local multi-stakeholder platform described in 4 above;
- Engaging the platform of NGOs and associations working on the promotion and protection of the rights of indigenous peoples of the Congo, for their potential role (see 4 above) to support the complaints management system;
- Creating a forum for Governance and Human Rights, which helped to prepare communities for their participation in the Messok-Dja workshop in November 2019, and for ongoing community engagement programmes on alternative economic livelihoods.

Giving voice to local communities

In December 2019, a multi-stakeholder platform was established to bring together local authorities, indigenous and local communities, female leaders, ETIC programme leadership, and representatives from the government and private sector (logging concessions and mining). It is also intended to support the local population to benefit from the “fonds de Développement Communautaire,” which are funds paid by logging concessions for community development. To access these resources, communities must design and propose projects for approval by the local government, which manages the fund.

Building ETIC/WWF capacity to better engage with IPLCs

WWF has recruited an indigenous peoples officer, who started on 1 July 2020, and a social policy officer, who started in October 2020. The ETIC community liaison unit currently consists of six people, including two members of indigenous communities. WWF is advocating that the government seek to recruit more Baka community members as part of government ecoguard teams.

Broader socio-economic work done by ETIC

ETIC has supported an education programme around Messok-Dja and in the Djoua-Ivindo area. WWF has supported the construction and restoration of schools that benefitted more than 500 students, including 60 Baka children. School kits were donated for 100 pupils, 40 tables and benches were made by the villagers, and ETIC supported the salary of a teacher. The ETIC project supplied PPE (Personal Protection Equipment) and pharmaceutical products to the Departmental Council of Sangha, intended for the health centres in the districts of Ngbala, Sembé, and Souanké. In addition, ETIC supported 36 awareness-raising missions for health authorities in the region.

Recommendation 6. Monitoring and transparency. WWF ROC should regularly and publicly assess and report on progress towards the implementation of the measures it is taking, including the number of complaints received and how they have been resolved, as well as on engagement with indigenous peoples and local communities. WWF deserves credit for asking FPP to provide an independent public assessment of its FPIC procedure. Similarly, it should publish regular, accurate reports on the challenges it faces and the measures it is taking to address them – without sugar-coating references to obstacles or local attitudes towards WWF.

As described in [Section 8c](#) of the General Panel Recommendations, a proposal will be taken to the ARCC to, at network level, publicly disclose a summary of complaints on an annual basis. To protect confidentiality, this will be at aggregate level with breakdowns by region, type/subject, and status (i.e. open or resolved/closed). The summary may include case studies, provided that all concerned parties have participated in case compilation and agreed to its disclosure. Country offices will have the discretion to make all or part of the report available in local languages.

Recommendation 7. Support to WWF ROC. WWF International and the WWF National Organisations working in Messok Dja need to provide greater support to the WWF ROC staff to enable them to implement these recommendations.

WWF has initiated a review of the ways and means to strengthen capacity in Congo Basin countries. WWF will take measures as per the results of this review and to increase oversight by the end of December 2021.

The ongoing E&S safeguards screening of Congo landscapes includes an analysis of activities (current and proposed), their source of funding (donor offices, external sources), and their implication for safeguards implementation. High-risk landscapes are escalated to the CQC, where overall resource allocation/budget and the adequacy of collaboration between funding and donor offices is discussed and recommendations made.

Nepal: Chitwan National Park

The Chitwan National Park has an area of 93,000 hectares, comprising grasslands, wetlands, and forest. It lies in the low-lying Terai area of southern Nepal and is part of the Terai Arc Landscape (TAL). This landscape straddles the Nepal/India border and covers over 2.5 million hectares of land stretching from the Bagmati River in the east to the Mahakali River in the west. The forests and grasslands within this area harbour one of the world's highest densities of tiger and the second largest population of greater one-horned rhinoceros. The park, declared in 1973, is Nepal's oldest national park. Initially, conservation efforts were geared to protecting wildlife within the park. However, as forest fragmentation increased outside its boundaries, it became clear that this approach was not adequate to conserve wide-ranging species. In 2001, Nepal adopted a landscape approach to conservation aimed at integrating conservation and development with a view to ensuring habitat connectivity while meeting local community development needs. While this approach is now being advanced across the country, it was initially piloted in the TAL.

The Terai Arc is home to more than 7.5 million people,¹³ with several ethnic groups represented including Banariya, Chepang, Danuwar, Majhi and Tharu. The population of the Terai increased rapidly after malaria was eradicated in the 1940s and many people moved down from the hills, clearing forest for agriculture and livestock husbandry. The Terai is now the "rice basket" of Nepal; the main sources of income for households are agriculture, animal husbandry, direct employment, and remittances. Forests serve as a safety net for many rural households in the landscape, particularly poor families who depend on natural resources, including those who live in buffer zones adjacent to the protected areas and in the corridors.

When WWF began working in Nepal in 1967, it was a nascent democracy. The country transitioned through a series of failed or strained governments for decades. Political activists and democratic supporters were arrested, student demonstrations and anti-regime activities were common, and life was particularly difficult for rural communities. By the late 1990s, Nepal's political instability gave way to civil war. "The people's war", initiated by the Maoist Communist Party of Nepal, lasted almost a decade and marked some of the most violent times in Nepal's recent history, with the deaths of over 17,000 people. At that time, illegal hunting of rhino and other species increased. In 2006, the Nepalese voted to abolish the monarchy; the country became a federal republic in May 2008 and was formally renamed the Federal Democratic Republic of Nepal. The Constitution of Nepal was finally adopted on 20 September 2015. Minority ethnic groups like Madhesi and Tharu protested vigorously against it, resulting in the closure of the Indian border for a few months. Since then, government restructuring has decentralized power from the centre to regional and local

¹³ Central Bureau of Statistics. 2011. National population and housing census (National Report). National Planning Commission Secretariat, government of Nepal, Kathmandu, Nepal.

levels, and, in 2017, elections were held for representatives at national, provincial, and local levels. While the new local municipalities still have low capacity, the people are now represented by elected, accountable officials.

For decades the central themes of WWF-Nepal's work has been improving the livelihoods and well-being of local people, reducing pressure on and restoring forests and wildlife, and elevating the very close connection between human and ecosystem health in Nepal. WWF-Nepal has long included livelihood and community forestry experts on its staff. Conservation was challenging during the unrest due to safety and security concerns, but WWF maintained a presence in the field even in the worst times of the insurgency, helped by its close relationship with local communities. For example, during that time, WWF supported the launch and implementation of the Bardia Integrated Conservation and Development Project. WWF also supported the handover of the Kangchenjunga Conservation Area management by government to local communities in 2006, making it the first protected area in the country to be managed by local community stewards. WWF participated in the Strengthened Actions for Governance in Utilization of Natural Resources programme, which focused on institutionalizing good governance practices in community-based organizations, including participation of women and other marginalized groups in decision-making and equitable sharing of benefits from community forests, and hence supporting a democratic process for conflict resolution and peace-building in the country. We expanded our capacity and that of our partners around sound governance approaches to promote participatory decision-making, benefit sharing, gender equity, and social inclusion in our work.

With the coming of peace, WWF-Nepal continued its efforts to benefit both people and nature. We ensured a pro-poor approach to conservation was emplaced and, as an institution, systematically mainstreamed sustainable livelihoods and social safeguards as a major strategy for all conservation work in Nepal. We contributed to the formulation of the Ministry of Forest and Environment's Gender Equity and Social Inclusion Policy, and we are actively working to make it a reality on the ground. Following the major 2015 earthquake, WWF provided emergency supplies and supported communities to rebuild their lives, building back better and greener for a more sustainable future. A few specific examples of activities include:

- Support for the passing of national management regulations and guidelines to facilitate the participation of local people in the conservation, management, and governance of conservation area buffer zones.
- Support to community forest user groups in TAL corridors to improve governance by following the Community Forest Development Guidelines, which require 50% representation of women in the executive committee of a community forest users' group, a woman as either the president or the secretary, and use of 35% of Community Forest User Group income to benefit the poorest members of the group.
- Livelihood support for forest-dependent households in corridors and buffer zones through forest enterprises such as homestays and commercialization of forest products; agriculture and livestock husbandry improvement; and skill-based training for youth, enabling them to gain employment or establish small-scale enterprises.
- Support for nearly 25,000 household biogas units in TAL, and many improved cookstoves: this greatly reduces the need for firewood for cooking, saving women much time and work in collecting firewood, reducing indoor air pollution that affects women and children, and enabling restoration of forests and watersheds. The biogas work supported the creation of a gold standard climate emissions reduction project.
- Support for forest restoration and improved watershed management in the Churia Hills resulting in greater quality and quantity of water supplies. This was integrated with water, sanitation and hygiene activities for forest-dependent communities to improve health and reduce the workload of women and girls fetching water.
- Despite the caste system having been officially abolished, unfortunately it is still present in many walks of life in Nepal. Also, the status of women in Nepali society is still unequal to that of men in many contexts, and gender-based violence is common, particularly in the Terai. Child trafficking is a

national problem, made worse by poverty resulting from the 2015 earthquake and likely to be impacted by the COVID-19 pandemic. Our work from national policy to community conservation, as well as our own institutional policies and practices within WWF-Nepal, have a major focus on gender equity and social inclusion. We are taking steps to reduce the risk of gender-based violence through our work with communities. While child trafficking is less directly connected to our work, we have run girls' education programmes and promoted empowerment of girls and women, and believe that by improving the livelihoods and well-being of poor families we help to reduce the circumstances in which trafficking flourishes.

The panel found that WWF-Nepal aspires to a human-rights-based approach and has recognized the importance of this.

The panel has provided four recommendations, listed below together with WWF's response.

Recommendation 1. WWF should ensure that the staff of WWF US and WWF Nepal are clear about how to identify human rights abuses and about how best to respond to them. It should develop guidance on when WWF should seek to leverage its position to address abuses and minimize the risk of recurrence.

As the panel noted, there has been extensive ESSF training in the US, in Nepal, and across the network around risk identification, mitigation, monitoring, and response. The WWF-Nepal team, with the support of WWF-US and other network partners, has already completed a comprehensive screen of all landscape projects and has provided training to our partners on the new safeguards framework. The updated network escalation process applies to all offices and staff in the US and Nepal to help understand how to share information and work together to develop solutions.

As described in our [response to 8b](#) of the General Panel Recommendations, WWF is implementing a series of measures to log and monitor complaints, including the future role of the ombudsperson on human-rights-related tracking and oversight by the ARCC.

WWF-Nepal has established a mechanism to receive and respond to concerns raised by stakeholders who may be affected by WWF-Nepal supported conservation activities, including WWF-Nepal's support for protected areas and engagement with conservation law enforcement. Complaints can be submitted to WWF-Nepal electronically, in writing, or verbally. WWF-Nepal has established a WWF-Nepal Project Complaints Team among senior staff that reviews and is charged with oversight of all complaints. This team will either address or escalate the complaint in a timely fashion depending on the nature of the complaint. WWF-US is kept informed of all complaints received by WWF-Nepal and if the severity or nature of the complaint requires escalation, these complaints are elevated first to WWF-US's Country Office Support Unit, and subsequently, if necessary, to WWF-US's Executive Team or Board. All complaints are logged in an office complaints log. Where complaints are determined to require resolution, an action plan will be agreed upon and established, including a timeframe for regular process monitoring towards the resolution of the complaint. The Project Complaints Team will coordinate the monitoring by organizing periodic checks – bringing together the concerned parties and relevant technical advisors for meetings or other communication on the status of action plans, until they are completed. This grievance mechanism is internally reviewed by WWF-Nepal on an annual basis to ensure effectiveness and identify gaps.

Recommendation 2. WWF Nepal should put in place a formal grievance auditing mechanism to ensure that allegations of human rights abuse made against the protected area rangers and Army personnel in areas within which WWF works are brought to the organisation's attention. There should be a single person in WWF Nepal tasked with carrying out the audit and providing recommendations to the senior management team and a corresponding point person in WWF US.

WWF-Nepal is establishing a partnership with the National Human Rights Commission to work together in monitoring progress and incidents around human rights relating to the protected areas. We have trained point people in both offices, who already working with each other.

Recommendation 3. WWF should advocate for reforms to end exclusion of marginalized communities and groups from buffer zone management bodies, in pursuit of social justice solutions in the context of conservation. WWF should use its best efforts to ensure that current conservation actions and institutions, such as BZUCs, represent and benefit all members of the communities.

WWF-Nepal focuses on issues of equity, gender, and social inclusion in its work with the government agencies, the national parliament and other relevant stakeholders as it carries out policy and advocacy work to strengthen policy on biodiversity conservation and sustainable development. In its fieldwork, WWF-Nepal is committed to working through community forest user groups and buffer zone user committees/groups in all of the landscapes where they are carrying out activities. Executives in these committees and groups are selected by all member households of that area: in buffer zones, these user groups are settlement-based. Every household (including indigenous peoples) of the settlement is a member of a user group and there is a space to represent interests of indigenous peoples and other marginalized groups. WWF-Nepal actively supports the functioning of these provisions and has given priority to ensuring targeted capacity building and inclusive and participatory consultation is included in planning and project design. WWF-Nepal supports capacity development of user groups to promote more meaningful participation of all households in decision-making processes. Priority is given to the vulnerable and marginal communities including indigenous peoples, especially to encourage equitable benefit sharing. For example, special priority is given to indigenous peoples in the design and interventions of livelihood improvement programmes. Poor and vulnerable households are selected to be primary beneficiaries by the communities on the basis of a well-being ranking created during the user group operational plan preparation and revision process.

Recommendation 4. WWF should adopt an independent mechanism for reviewing and considering complaints made against the government, including protected area rangers and Army protection units, in respect of indigenous peoples' rights and their access to local resources.

WWF-Nepal is in discussion with the National Human Rights Commission about ways and means for strengthening national grievance mechanisms. Many multi-lateral and bi-lateral bodies – including the UN and governments of Norway, UK, and US – have been working with the government of Nepal to strengthen the commitments to law enforcement with social justice, demonstrating that there is still work to be done to realize the post-conflict commitments to rights.

India: Kaziranga National Park

The Kaziranga Karbi Anglong Landscape (KKL) is located in the state of Assam in north-eastern India. The landscape covers an area of about 2.5 million hectares and encapsulates a national park, a tiger reserve, nine wildlife sanctuaries, and of two elephant reserves, along with numerous reserve forests and district council reserve forests. KKL has diverse ecosystems, including wide rivers, floodplain grasslands on the plains, and dense forests in the hills, each supporting diverse and threatened fauna and flora. The landscape harbours some 2,400 greater one-horned rhinoceros, which is approximately two-thirds of the species' total global population. It also holds a significant tiger population, with one of the highest densities in the world. The area is also designated as an Important Bird Area. The Karbi Anglong forest complex, covering an area of 1 million hectares, is a key component of the landscape. The forested hills of Karbi Anglong are the source of

numerous streams and rivulets that drain into the low-lying Kaziranga National Park (KNP), forming ecologically important wetlands. KNP is the cornerstone of this landscape complex. The park, which is spread over about 90,000 hectares, was officially notified as a national park in 1974. However, the area which is now KNP has a long history of protection. These forests were first given protection as long ago as 1905, and in 1908, about 23,000 hectares was constituted as a reserved forest to protect the greater one-horned rhino. It was declared a game sanctuary in 1916 and as a wildlife sanctuary in 1950.

As per the 2011 census, Assam has a population of 31.21 million, of which 86% is rural. The tribal¹⁴ (indigenous) population is 12.45% of the total population of the state. The landscape is home to diverse ethnic communities of which many are classified as “Scheduled Tribes” by the government of India. The main indigenous groups in Assam are the Bodo, Dimas, Karbi, Mising and Tiwa. For historical and other reasons, the north-east of India is economically less developed than many other parts of the country. The limited economic opportunities, small and marginal landholdings, and annual flooding exacerbate poverty of the people living within the landscape. A sense of deprivation among local communities also fuels low intensity hostility towards the state and, as a result, there are several instances of communities settling on forest land, which further exacerbates the conflict between communities and the forest department. In addition, historical ethnic and sub-national movements have resulted in conflict in Assam. Ethnic conflict in Assam is not a recent phenomenon; rather, it has been a long-standing cyclical issue, flaring up periodically.

The main livelihood of tribal and local communities in Assam is crop-based agriculture, supplemented with livestock rearing and fishing. The communities are also involved in the tea, mining, and tourism sectors. The tribal and local communities collect firewood and non-timber forest products from the forest areas outside KNP, mainly from the forests of Karbi Anglong. The firewood collected is mainly for subsistence use but is also sold to the many restaurants and smaller roadside food stalls all along the highway on the southern boundary of the park. Several communities depend on fishing in the Brahmaputra river and its tributaries, especially along the northern part of KNP. Livestock grazing occurs mostly along the fringes of the national park boundary and human-wildlife conflict, while not very high in comparison to many other regions across the country, does take a toll.

In Assam, autonomous councils represent tribal communities. Villages in the tribal areas also have village councils. No activities can be undertaken in these villages without consultation with both councils. In villages outside the tribal areas, the *panchayat* is the lowest tier of governance for the villages, and within a village, it is the *Gram Sabha* or village assembly. WWF-India works closely with all these institutions from the state to the village level. In India, all Protected Areas (PAs) are managed as per the provisions of the Wildlife (Protection) Act and governed by the Indian Forest Act 1927, both of which have provisions for settlement of community rights when any area is declared as a PA. All forest areas and PAs are managed by the forest departments of the respective states where they are located. However, in certain parts of north-eastern India, including Assam, there are also forests under the jurisdiction of local communities, which provide an opportunity to set up community-managed conservation areas.

Commercial poaching in the landscape dates back to the 1950s. Early efforts to curb poaching were put in place in 1954 through the Assam Rhinoceros Preservation Act, which deemed killing rhinos a punishable offence. The 1980s proved to be the worst decade for rhino poaching where, in the first five years (1980-1985), Kaziranga lost more than 160 rhinos, which was more than the combined figure of the previous two decades. This number continued to increase and by the end of 1993 poachers had claimed a total of 452 rhinos, more than one-fifth of the world population of the species at that time. The steep increase in the number of rhinos poached during the 1980s and 1990s coincided with the times of extensive civil unrest in Assam. In the late 1980s, a militant organization, that had the goal of separation from the Indian state, was actively involved in rhino poaching in Assam to fund arms purchases through the illicit sale of rhino horn. This also marked the period when, because of increased availability of guns in Assam due to the socio-

¹⁴ As commonly used in India, the term “tribal” can be considered synonymous with “indigenous” in this document. The term “tribes” can be considered to mean “indigenous communities”.

political disturbances in the state, the use of guns for killing rhinos became more common. At the same time, while poachers were using more sophisticated firearms to kill rhinos – including semi-automatic rifles – forest guards were equipped with torches, bamboo sticks, batons, and .303 rifles or shotguns which were largely ineffective in dealing with organized poaching gangs that often worked together with the insurgents. Given the nexus between illegal wildlife trade and the arms trade, coupled with civil unrest, park authorities increased measures to protect wildlife, and the rhino population in Assam has bounced back over time.

The strict law enforcement for protection of rhinos in Kaziranga has been the main bone of contention between the forest department, local authorities, and local communities. In some cases, the law enforcement measures have led to conflict, and authorities have taken action to put in place legal processes for enquiry and redress. WWF-India is cognizant of these situations and speaks up where required.

A critical feature of the landscape is the corridors that maintain connectivity between Kaziranga and the Karbi Anglong Hills. WWF-India has been working in this landscape since 2004 with an aim to secure habitat connectivity for wild animals so they can move freely between Kaziranga National Park and the Karbi Anglong forests. The support to the forest department for controlling rhino poaching is done through strengthening monitoring protocols using specialized software, building capacity of forest department field staff, and providing support for better law enforcement (including technical support for wildlife monitoring, crime scene investigations, wildlife law, and use of technology, logistical, and mobility equipment).

WWF-India works closely with the Karbi Anglong Autonomous Council to empower communities to conserve and manage their forest areas through strengthening community institutions for effective forest management. WWF-India also facilitates establishment of community conserved areas for securing important wildlife habitats under community ownership within their region.¹⁵ WWF-India works directly with communities that reside in the periphery of the protected areas, in critical wildlife corridors, and in villages affected by human-wildlife conflict to support the diversification of livelihoods, provide access to clean and alternative energy, enhance food security, and promote community stewardship of forests and wildlife. Some examples of this support include:

- To manage human-elephant conflict, the landscape has a unique programme, which involves working with high-conflict-affected villages to establish anti-depredation squads in partnership with communities.
- Livestock comprise one of the main assets for the villagers in this landscape. To protect their assets and reduce the spread of infectious diseases from livestock to wild herbivores and vice-versa, WWF-India has been organizing livestock vaccination camps. In 2020, and despite COVID-19, over 15,000 livestock were vaccinated in such camps.
- Diversification of livelihood options includes support for activities like weaving of traditional clothes, food processing, improved farming, fishery, poultry, and animal husbandry practices.
- As part of a community-based tourism initiative, WWF-India has helped form groups of tourism service providers from the local communities and organized capacity building programmes for them, provided essential materials for tourism, created infrastructure and storage facilities for the materials, and helped in marketing.
- WWF-India has set up solar-powered fences for crop protection and constructed corrals for livestock protection in the forest periphery villages. Solar streetlights that help local people avoid encounters with wild animals at night have been installed. Use of alternative and clean energy among forest-dependent tribal and local communities, like fuel-efficient devices for cooking and micro solar domes for lighting, is being promoted. Children from local schools have been involved in various education programmes.

Support from existing government schemes and programmes is being leveraged to scale up livelihood activities in the landscape by empowering village institutions (includes supporting *panchayats* to prepare

¹⁵ Community conserved areas in India are areas being conserved by communities for certain species or habitats as well as cultural, religious, livelihood, or political purposes, using customary laws or any other effective means. They do not fall under the formal category of PAs.

plans for accessing government development funds and/or lobbying district authorities to run schemes in a particular village).

The panel has provided two recommendations, listed below together with WWF's response.

Recommendation 1. Where WWF India provides support for law enforcement, protection services or anti-poaching campaigns, it should ensure that the rangers are well trained on all aspects of the use of firearms, including respect for the human rights of the local communities and those suspected of poaching.

We will ensure that law enforcement training supported by WWF-India integrates human rights. Furthermore, over the last year, WWF-India has been coordinating a project to reform ranger training throughout India, including embedding a module on human rights in ranger training curricula in colleges across the country.

WWF-India does not intend to undertake or directly support training on the use of firearms.

Recommendation 2. Where WWF's commitment to the rule of law is assailed by association or implication, WWF India should assert its own principled position of respect for human rights and the rule of law by making clear that it would oppose any such a 'shoot on sight' policy.

WWF-India is committed to the rule of law and to respect for human rights. If we become associated with statements that go against these principles, we will assert our position. We will also be more diligent in proactively identifying and clarifying our position on human rights in situations where any ambiguity might arise.

CLARITY ON ABBREVIATIONS

ARCC – WWF’s Audit, Risk and Compliance Committee
CAR – Central African Republic
CIHR – Conservation Initiative on Human Rights
CSO – Civil Society Organization
CQC – WWF’s Conservation Quality Committee
DRC – Democratic Republic of the Congo
DSCPA – Dzanga-Sangha Complex of Protected Areas in Central African Republic
E&S – environmental and social
ESSF – WWF’s Environmental and Social Safeguards Framework
ETIC – Espace TRIDOM Interzone Congo, a joint conservation initiative of WWF and the government of the Republic of Congo
ExCiteS – Extreme Citizen Science initiative of University College London
FCV – Fragile, conflict-, or violence- affected (referring to states)
FPIC – Free, Prior, and Informed Consent
FTNS – the Sangha Tri-National Trust Fund in Central African Republic
GPS – Global Positioning System
HRCC – Human Rights Commitments and Compliance
ICCA – Indigenous and Community Conserved Area
ICCN – the Congolese Institute for the Conservation of Nature (Institut Congolais pour la Conservation de la Nature) in the Democratic Republic of the Congo
ILO – International Labour Organization
IPLC – Indigenous Peoples and Local Communities
IUCN – International Union for Conservation of Nature
KKL – Kaziranga Karbi Anglong Landscape in India
KNP – Kaziranga National Park in India
MINFOF – Ministry of Forests and Fauna in Cameroon
MOU – Memorandum of Understanding
NET – WWF’s Network Executive Team
NGO – Non-Governmental Organization
PA – Protected Area
PFP – Project Financing for Permanence
PPMS – WWF’s Standards of Conservation Project and Programme Management
ROC – Republic of Congo
SD4C – WWF’s Social Development for Conservation community of practice
SMART – Spatial Monitoring and Reporting Tool
SNP – Salonga National Park in the Democratic Republic of the Congo
TAL – Terai Arc Landscape in India
TMJ – Tinjure-Milkhe-Jaljale Forest Complex in Nepal
TRIDOM – Tri-National Dja-Odzala-Minkébé transborder forest spread over three countries: Cameroon, the Republic of Congo, and Gabon
UNESCO – United Nations Educational, Scientific and Cultural Organization
UN – United Nations
URSA – Universal Ranger Support Alliance
USLAB – monitoring and anti-poaching ecoguards employed by the Republic of Congo government and engaged by private concessions for protection
WCU – the Wildlife Crime Unit (WCU) within the WWF Congo programme
WGII – Working Group for ICCAs in Indonesia