Social Policies and E&S Safeguards Consultation

Interim report on approach, analysis, conclusions and recommendations
November 2021

Report by Fronteer, Co-creation Consultants
In May 2021 WWF partnered with the co-creation consultancy Fronteer to run a public consultation on the network’s social policies and environmental and social safeguards.

WWF has been working on nature conservation and regeneration for 60 years, alongside people and communities around the world. For us, healthy ecosystems are deeply linked to peoples’ lives, livelihoods and well-being. We believe lasting impact can only be achieved by partnering with communities, including respect for, and promotion of their rights. We recognize, however, our limits as a conservation organization and the constraints of running a consultation during a global pandemic when we were not able to engage directly with Indigenous Peoples and local communities in the landscapes where WWF works. We will continue to rectify this through the ongoing implementation of the safeguard standard on stakeholder engagement in the landscapes where WWF is active.

The consultation on our Environmental & Social Safeguards and Social Policies was a planned activity at the time of adoption of the ESS Framework by the WWF network in 2019. It is the first time that WWF has undertaken such an extensive, global consultation on policy documents and therefore represents an important milestone in WWF’s goal for greater engagement and transparency.

Through this consultation, we wanted to engage in a meaningful conversation about our work and the safeguards and social commitments that we have in place to guide, learn from and improve our work.
The consultation was designed to capture a diversity of perspectives, from ‘passing interest’ to those who have professional expertise and years of practical experience. We are deeply grateful to everyone who participated for their generous contributions of time and wisdom.

In May 2021, we shared revised social policies and environmental and social safeguard drafts through a consultation portal on panda.org. Starting with an overview, the content was designed to guide you into the detail, allowing you to explore specific topics of interest, to finally submitting your feedback through the online survey.

Additional to the portal we ran a number of global and regional consultations, with a range of stakeholders including peer organizations, Indigenous peoples groups, human rights experts, UN agencies and development finance representatives, to discuss our approach and enrich our policies.

The public consultation was a starting point for regular dialogue for those interested in this aspect of WWF’s overall policy framework. A wide variety of feedback was received, from top level comments to in-depth questions, critiques and recommendations.

The following pages capture Fronteer’s initial analysis and recommendations to WWF - on both the consultation process itself (process recommendations) and the structure and content of the documents consulted on (conclusions and recommendations). We assured all participants that their feedback would remain unattributed and to assure this, some pages have been excluded from Fronteer’s original report. These exclusions, however, do not influence the conclusions and recommendations made.
Public consultation ESSF

Interim report and recommendations

31 August 2021
Objective of the consultation

To validate the ESSF and social policies with key stakeholders and strengthen it with input, to ensure continued buy-in in the future.
WWF and Fronteer collaboratively defined the ESSF consultation essence in order to specify the consultation scope (themes, areas, stakeholders).

In phase 2 the portal was built, launched and actively monitored. WWF employees were trained. To increase consolidation effectiveness, both a quantitative and qualitative track was run simultaneously.

All data and insights have been consolidated, reported and translated into a tangible roadmap to 1.) optimise the ESSF if needed and 2.) prepare a public response.
Consultation approach

A combination of an open platform consultation with multi-stakeholder validation & enrichment.

- Open platform (survey) consultation (6 weeks)
- 5 global key stakeholder dialogues
- 3+ local stakeholder dialogues by NO's
- Additional 1-on-1 dialogues
A topical approach, enriched with quantitative analysis

- Clustering all comments based on topic
- Target group & regional differentiation
- Quantitative analysis on attitude & understanding
- 1185+ sticky notes
- 117 preliminary insights
- 10 Process learnings
- 11 Conclusions and Recommendations
Deliverables

Output on different levels

OVERALL LEARNINGS, CONCLUSIONS AND RECOMMENDATIONS
Summarising key statistics, learning, conclusions and recommendations for further development of the Social Policies and Environmental and Social Safeguards for WWF.

RAW INPUT, INSIGHTS AND RECOMMENDATIONS PER DOCUMENT
Raw input from the consultation without interpretation, key insights and recommendations for each document from the consultation (policies & safeguards).
Survey results
Total number of responses: 279
  • Completed: 122
  • Partial: 157

  • Many of the respondents only partially filled out the survey. Also; some demographic questions were not mandatory, to ensure privacy and accessibility.

  • The following slides therefore provide valuable insights into the survey responses, but are not completely representative of the full set of responses.
41 nationalities represented

*This is not a full representation of the survey as nationality was not a mandatory question.
Global spread by region

Europe: 32
Asia: 18
Africa: 22
Pacific: 1

Americas: 5
Latam: 34

*This is not a full representation as nationality was not a mandatory question.*
Demographics (1)

*This is not a full representation as gender and age were not mandatory questions.
Age distribution compared to panda.org

Survey representation compared to website traffic

<table>
<thead>
<tr>
<th>Age (years)</th>
<th>Survey</th>
<th>panda.org</th>
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<tbody>
<tr>
<td>18-24</td>
<td>0.85%</td>
<td>32.85%</td>
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<tr>
<td>25-34</td>
<td>19.49%</td>
<td>26.90%</td>
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<td>35-44</td>
<td>31.36%</td>
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<tr>
<td>45-54</td>
<td>22.03%</td>
<td>12.17%</td>
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<td>55-64</td>
<td>17.80%</td>
<td>6.93%</td>
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<tr>
<td>65+</td>
<td>8.47%</td>
<td>5.64%</td>
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</table>
Demographics (2)

Do you identify with an Indigenous Peoples community?

- Yes: 22.0% (26)
- No: 78.0% (92)

*This is not a full representation as identification as Indigenous peoples was not a mandatory question*
Demographics (3)

Do you work in any of the following areas?

- Conservation: 35.1%
- Environment: 137
- Human Rights: 15.1%
- Indigenous Peoples: 44
- Local Communities: 49
- Marketing: 12
- Politics: 13
- Finance: 12.6%
- Media: 3.3%
- For a charity: 6.4%
- Consulting: 2.6%
Familiarity with WWF’s work

External responses only

How familiar are you with WWF’s work around human rights and conservation?

<table>
<thead>
<tr>
<th>Level of Familiarity</th>
<th># of People</th>
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Average and Median:
- External: Average 62, Median 68
Familiarity with WWF’s work

External responses only

How familiar are you with WWF’s work around human rights and conservation?

<table>
<thead>
<tr>
<th></th>
<th>WWF</th>
<th>EXTERNAL</th>
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<tbody>
<tr>
<td>External Average</td>
<td>62</td>
<td>68</td>
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<tr>
<td>WWF Average</td>
<td>80</td>
<td>82</td>
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<tr>
<td>Combined Average</td>
<td>65</td>
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General attitude (1)

External responses only

My understanding of safeguards in conservation is now better than before

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<tr>
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<th>Completely disagree</th>
<th>1</th>
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After reading the information I feel equipped to share feedback

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It is important that WWF seeks feedback on their social policies and safeguards

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General attitude (1)

External + WWF responses combined

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<tr>
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General attitude (2)

External responses only

I would want to give feedback on other aspects of WWF’s work

- Average: 3.6
- Median: 4.0

It is important that WWF’s work with people in conservation is transparent

- Average: 4.7
- Median: 5.0

I am more interested in human rights in conservation following this consultation

- Average: 3.8
- Median: 4.0
General attitude (2)

External + WWF responses combined

I would want to give feedback on other aspects of WWF's work

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It is important that WWF's work with people in conservation is transparent

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I am more interested in human rights in conservation following this consultation

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Social policies

External responses only

I understand what the social policies are about

The social policies help me gain trust in WWF’s efforts around human rights and nature conservation

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Social policies

External + WWF responses combined

Interim report, November 2021

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I understand what the social policies are about

![Bar chart showing understanding of social policies](chart)

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<tr>
<td>WWF</td>
<td>4,1</td>
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The social policies help me gain trust in WWF’s efforts around human rights and nature conservation

![Bar chart showing trust in social policies](chart)

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ESSF

External responses only

I understand what the Environmental and Social Safeguards Framework is about

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The ESSF helps me gain trust in WWF’s efforts around human rights and nature conservation

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Interim report, November 2021
**ESSF**

External + WWF responses combined

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**I understand what the Environmental and Social Safeguards Framework is about**

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<thead>
<tr>
<th></th>
<th>WWF</th>
<th>EXTERNAL</th>
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<td># of people</td>
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</table>

**Average** | **Median**
---|---
External | 3,8 | 4,0
WWF | 4,1 | 4,0
**Combined** | 3,9 | 4,0

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**The ESSF helps me gain trust in WWF’s efforts around human rights and nature conservation**

<table>
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</table>

**Average** | **Median**
---|---
External | 3,6 | 4,0
WWF | 4,0 | 4,0
**Combined** | 3,7 | 4,0

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Interim report, November 2021
Most participants found the WWF public consultation...

Overall impression

Easy to understand
12/19 participants scored 4 points or higher

Important
18/19 participants scored 4.5 points or higher

Trustworthy
14/19 participants scored 4 points or higher

Feeling heard/listened to
12/19 participants scored 4 points or higher

* Safeguard practitioners did not fill in these questions due to alternative session set-up
Process learnings
Process learnings

Overview

1. The consultation is well received
2. Involve stakeholders earlier in the process
3. Provide more context and explanation
4. An online portal is necessary, but not enough
5. Ensure a consultation in multiple languages
6. Involvement of local offices is challenging
7. Make clear stakeholder choices beforehand
8. Do not discard incoming feedback
9. Report back in a two-phased approach
10. Set up debrief sessions
During the workshops and through the online portal WWF received a lot of feedback. The general tone of voice is very positive: most stakeholders very much appreciate WWF taking the time and effort to conduct this consultation and see it as a stepping stone to better collaborations.

WWF should continue to facilitate the dialogue around their work and ambitions together with stakeholders. It ensures increased trust and stakeholder buy-in with WWF’s work.
This consultation process involved important stakeholders after the documents were written. Stakeholders argue that it is critical to involve them before, during and after writing the documents.

In a next consultation WWF should consider involving stakeholders and starting a conversation not only after the documents have been written but also before and during the process of creating the documents.
During the global stakeholder sessions the participants indicated that the context (motivation, objective, approach) of the consultation was often unclear. This made it difficult to provide feedback in certain cases.

In a next consultation WWF should provide more information around the consultation to the respondents. Explain more clearly the purpose, the target group and the objective of the consultation.
Especially in times of Covid, the online portal was a necessary tool to collect feedback. However, not everyone can easily access it; especially Indigenous peoples and local communities experience a barrier. Therefore creating additional ways of collecting feedback through different tools is key to ensure proper representation.

**WWF should consider putting even more focus on creating a solid ‘consultation methodology mix’ to ensure everyone - including Indigenous peoples and local communities - can give their feedback.**
5. Ensure a consultation in multiple languages

During this consultation all documents were provided in the English language only. Although the portal was available in English, French and Spanish and the survey was available in four languages (aforementioned + Portuguese) this is not enough to ensure the accessibility of the consultation.

Consider what key stakeholder (groups) should be involved and make sure all consultation documents are available in their languages.
The quality of a consultation depends greatly on the involvement of local WWF offices in promoting and distributing the consultation, translating documents and organising local consultation activities. Although some offices were very engaged, the engagement of local offices in general was disappointing.

Engagement of local offices is essential in a consultation. In a next consultation WWF should take into account that involving local offices takes much time and can be challenging. Therefore make sure you put enough resources into actively involving them.
During the consultation process there were many internal discussions around the type of stakeholders that WWF wanted to invite for the global stakeholder dialogues. These discussions took quite some time and caused last-minute invites with limited attendance as a result.

Decide beforehand which key stakeholders you want to involve, think of the best method on how to consult them and invite them in time.
When discussing the received feedback, it is easy to discard certain feedback or to automatically attribute it to a certain person or group. These assumptions can cause a bias in analysis and could therefore disrupt the process.

Fronteer strongly advises WWF to take all feedback into account, do not dismiss the feedback before carefully reviewing it.
Throughout the consultation we received a lot of feedback. More consultation activities have been planned or postponed due to circumstances, so more feedback is expected to follow. To keep stakeholders involved it is important to update them on your progress, even though processing everything will take time.

Consider taking a phased approach to reporting or publishing consultation results to keep stakeholders involved.
Various stakeholders appreciated the invitation to connect and collaborate further on the development and implementation of safeguards. They will most likely welcome a continuous dialogue to share learnings, set up collaborations and make more impact together.

After publishing the consultation results, set up debrief sessions with key stakeholders to continue the conversation.
Conclusions & Recommendations
# Conclusions and recommendations

## Overview

1. Define a clear target
2. Provide more context
3. Make commitments explicit
4. Define the red lines
5. Build one cohesive architecture
6. Create a WWF glossary
7. Build internal and external capacity
8. Build human rights expertise
9. Create more visibility
10. Disclose information on implementation
11. Involve Indigenous peoples on a structural basis
"They need to be easy and understandable from not only WWF employees but also partner organisations and people affected by WWF’s and its partner’s work."

"The tone could be more inspirational - less feeling that this was a mandatory exercise. The standards can be more specific."

1. Define a clear target

For many documents, it seems unclear to readers who the intended target audience is. Are the documents focused on WWF staff, external partners, topic experts or the general public? Language is inconsistent and sometimes hard to follow and understand.

To improve readability of the documents and ensure appropriate application it is therefore key to define a clear target audience and adapt the document’s language accordingly.
“WWF has not referred to some of the challenges faced in this area. Though painful, they really make it clear why these safeguards are very very important.”

“Is this policy document replacing or supplementing the previous documents on Indigenous peoples and Conservation?”

Context

2. Provide more context

There is little context in all the documents. This makes it difficult to understand what the goal of a certain document is, why it was developed and what international guidelines were taken into account.

To increase understanding, it is key to provide more context around the development and purpose of each policy/standard: explain how a policy was developed and why - and with what objectives and standards in mind.
"Why does WWF need to assess projects and programmes against its own framework, this adds complexity when e.g. KfW are the donor and have quite specific requirements/expectations. How can the different Standards/requirements be better aligned?"

"Why not explicitly mention UNDRIP and UNDROP in the main text rather than a footnote? The whole case against WWF was about non-respect of Indigenous and Local Peoples rights. It is therefore strange that UN declarations on respecting these rights (UNDRIP, UNDROP etc.) are relegated to a footnote in the Introduction."

3. Make commitments explicit

The cohesion with external frameworks is unclear and leads to confusion: are you building your own or following international standards? There is a strong need for transparency around what international standards or frameworks you follow, and where you have created your own.

Be more transparent about what internationally acknowledged frameworks you commit to and where you have created your own.
“Many projects operate in a challenging context. There are red lines, especially when marginalized or indigenous groups are involved. I think that it’s the responsibility of the implementing organization that all processes are managed in a way that adheres to human rights.”

“These discussions are critical because we are talking about critical issues and red lines, the implementation will be key.”

4. Define the ‘red lines’

How to navigate situations where WWF policies do not align with national law, or its interpretation or implementation? What principles does WWF fall back on to ensure that it can identify and communicate a red line (and any escalation ‘grey lines’ that lead up to it)?

Be more explicit about what lines you hold yourself and your partners to; what lines should never be crossed.
“...at the beginning it takes time to familiarize or navigate through the structure. Meaning how to understand the documents build or complement each other as policy statements versus standards and the tools to do the screening.”

“I had a harder time understanding how the various standards (as outlined in the question above) fit within the ESSF.”

5. Build one cohesive framework architecture

It is unclear to people how the different documents fit together, even though they have a joint purpose. What is the difference between social policies and safeguard standards; how do they complement each other? Where does implementation guidance fit in this structure? These documents could benefit from a more unified architecture.

To improve accessibility and understanding, create one cohesive framework that is easy to understand and logical to read.
DEFINITIONS

6. Create a WWF glossary

Certain definitions yield confusion, such as *prior* and *before* when it concerns FPIC or *landscape approach*. But possibly more important; there is also unclarity about how WWF defines *human rights* or distinguishes between *Indigenous peoples* and *local communities*.

Create a glossary in which you explain the definitions that WWF uses and why these definitions are maintained in the policies and safeguards.
To ensure proper implementation of safeguards in the field, it is essential that WWF staff and partners have the right knowledge, skills, and tools. People should know what to do, how to handle sensitive situations, and more.

Interestingly, this is also a key concern for WWF staff: several WWF colleagues mentioned this in the survey.

Take capacity building seriously: continuously educate and support staff and partners in the field about safeguards.
HUMAN RIGHTS

8. Build human rights expertise

WWF is not an expert on the topic of human rights, nor does it need to be. However, it is essential for WWF to understand the dynamics between conservation and human rights and act accordingly to ensure WWF respects and protects human rights properly.

Build strong human rights expertise within the WWF network by appointing a specific role, or building an advisory expert network.
We miss the involvements of IPs and local communities in the Feedback Grievance Redress Mechanism (FGRM) design.

There are concerns about the feasibility of the complaints mechanism due to constraints related to distance or isolation of communities.

Grievance mechanisms are not functioning well if people cannot find or access them, especially with regards to Indigenous peoples. In order to ensure that effective grievance mechanisms are in place, they should be easy to understand and have a transparent process.

Make the grievance mechanisms process more visible and easy to understand. Pay specific attention to communication channels that are suitable for Indigenous peoples. For example: think of local languages or multiple independent touch points on a local level.

GRIEVANCE MECHANISMS

9. Create more visibility
Implementation is key! Make sure that you make it systemic into processes and think about ways to hold people accountable. Really train your staff on good implementation. 

"Is there an incentive to comply, and what happens if you don’t comply? There is a need for a compliance mechanism."

Implementation is key for all stakeholders. It is unclear how WWF holds their people accountable or how they incentivise their people for implementing the safeguards. Use clear communication to manage expectations around implementation.

Disclose information on your implementation strategies. Show stakeholders that WWF acknowledges the importance of implementation and how WWF ensures good implementation of the safeguards. Include implementation as part of the Social Policies and Safeguard documents.

"Implementation is key! Make sure that you make it systemic into processes and think about ways to hold people accountable. Really train your staff on good implementation."

10. Disclose information on implementation

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INDIGENOUS PEOPLES

11. Involve Indigenous peoples on a structural basis

It is not clear how WWF is involving Indigenous peoples throughout the process of developing, implementing and evaluating safeguards. There is a clear need for more structural collaboration. This is key for a successful framework as they are one of the main stakeholder groups.

Involve Indigenous peoples on a structural basis, throughout all stages of safeguarding. From developing the policies and safeguards to implementing, monitoring and evaluating the projects. Make it accessible and transparent to them.
The public consultation was a valuable process that achieved its objective of facilitating a meaningful dialogue with a diverse range of stakeholders. During the workshops and through the online portal, the feedback was generally positive - particularly on the consultation process itself - but we also received critical feedback on our ability to implement policy commitments and our broader conservation approach.

We recognise the need to continue meaningful dialogue around our current work program and future strategic ambitions. COVID-19 makes this challenging - particularly at community level. While the online portal is now closed, engagement and consultation with Indigenous Peoples and local communities will continue through our ongoing programme to safeguard every landscape where WWF is active.

We are currently in the process of reviewing the overall analysis and the document by document detail provided by Fronteer and revising the social policies and safeguards to reflect the feedback received. The proposed revisions require approval from WWF’s Network Executive Team and the International Board, at which stage they will be posted on panda.org, together with an updated version of this document.

Thank you for your interest in this matter and taking the time to read our report. Please contact us if you have enquiries (consultation@wwfint.org).

Interim report, November 2021