



2nd May 2019

Marco Lambertini
 Director General
 WWF International

Dear Mr. Lambertini,

We are writing to you in relation to recent allegations appearing in Buzzfeed and other media outlets, reporting consistent and serious human rights abuses associated with conservation activities implemented by, or funded by, members of the global WWF Federation¹.

A number of us work together with WWF on policy and advocacy in the UK and EU, as well as in sites and areas around the world, and we would like to share our concerns with you. Human rights are a non-negotiable element of the work that we do, and we have read the articles and the evidence provided with serious concern.

Some of our organisations have documented these cases ourselves, whilst others (including some of the most serious) have been acknowledged by WWF itself. Many are consistent with previously reported allegations from a number of international organisations. We believe that this problem is systematic, and an inevitable result of WWF's policies, practices and strategies. We therefore believe that the entire WWF Federation should not only take immediate steps to address current reports of human rights abuses linked to WWF funding, but begin a comprehensive process of reform, review and change to address these longstanding and consistent problems and ensure that these situations do not repeat themselves.

We have seen WWF's explanation of the first steps that it will be taking to address these serious allegations as well as the structure of the investigation process². We understand that WWF is committing to an external investigation of these allegations by a 'Review Team', including the UK law firm Kingsley Napley, and to establishing an 'External Review' by an Independent Panel of Experts. We welcome the announcement that former UN High Commissioner of Human Rights, Navi Pillay, will oversee this review. However, we have serious concerns about the apparent lack of rigour, transparency and scope of these steps, and feel they are not commensurate with the nature and scale of the problems that are currently being reported or have been communicated to WWF previously.

¹ This coverage to-date includes: [Torture, Murder, Rape: WWF Withholding Sensitive Report](#) (article in German only); [WWF Funds Guards Who Have Tortured and Killed People](#); ["Torture, murder, rape": WWF must release its report about abuses carried out by eco-guards in Salonga National Park](#); [A Leaked Report Shows WWF Was Warned Years Ago Of "Frightening" Abuses](#)

² <http://wwf.panda.org/?344901>



We therefore request that WWF International:

1. Issue an immediate statement condemning the gross human rights violations reported to be associated with some WWF activities or funding, acknowledge the nature and scale of the problem (which extends beyond the current allegations), commit to a comprehensive response and to supporting redress for the victims and their families;
2. Make available the proposed detailed Terms of Reference for the independent investigation being led by Kingsley & Napley, along with details of the human rights expertise that will be engaged in this process;
3. Significantly reformulate the composition and mandate of the ‘Independent Panel of Experts’ being constituted to review these allegations, to allow for a comprehensive response to these serious reports.³ At a minimum this should include:
 - a. Clear objectives and purpose
 - b. Expanded scope and coverage to include allegations of human rights abuses across WWF programmes, and their wider linkages to WWF’s policy, practice, strategy and approach, rather than limiting the review to the few cases highlighted in current press reports
 - c. Independence in establishing the appropriate fact-finding process, including field investigations where necessary
 - d. Inclusion in the Independent Panel of individuals with human rights, indigenous rights and land tenure expertise, and a process to ensure that key stakeholders (most notably indigenous peoples’ representatives) are involved in selection of the panel;
 - e. Prior notification provided to the public and relevant stakeholders of investigations on specific cases;
 - f. A clear and open invitation for the submission of evidence, whether or not on cases already under investigation by the Panel, including a clear process to encourage and ensure input from southern and indigenous organisations;
 - g. Regular progress reports (such as every three months), including specifically on which cases have been investigated;
 - h. A commitment not only to publish the final outcome of the Panel’s review but additionally to ensure that the process is open to scrutiny, by making publicly available further information relevant to the investigation, follow up and review of policies, including findings, recommendations and information on the members of the panel of experts.

Finally, the current commitment to ‘immediate review of safeguards, training, compliance and monitoring’ is insufficient.⁴ WWF must engage organisations with specialist expertise in this area,

³ These recommendations echo and support previous recommendations provided to WWF International under separate cover. See: <https://www.rainforestfoundationuk.org/media.ashx/wwfletter.pdf>

⁴ Such an internal review of policies and processes is mentioned in the WWF Statement here: http://wwf.panda.org/wwf_news/?uNewsID=344653



including crucially indigenous and southern organisations, in a wider review. WWF should commit to publishing the results of this internal review, including reporting to the WWF International Board, and putting into place mechanisms to ensure compliance with the results of the review. This could form part of the terms of reference for the 'Independent Panel of Experts' or be conducted separately.

It is our belief that these steps are crucial to safeguard an independent and robust review. Failure to do so risks further undermining WWF's future mission and credibility at a time when the planet's natural environment needs urgent protection.

WWF has an opportunity now to signal to the world a fundamental shift across its entire international programme away from exclusionary conservation towards rights-affirming conservation - putting into practice the commitments that were made in IUCN's World Parks Congress in Durban in 2003.

We therefore wait in eager anticipation of your response and would welcome the opportunity to meet with leadership at WWF International staff to provide further information and evidence to support these requests.

With best regards,

Director, Forest Peoples Programme, on behalf of:

- Forest Peoples Programme (UK)
- International Work Group on Indigenous Affairs (Denmark)
- Well Grounded (UK)
- Almaciga (Spain)
- Natural Justice (Global)
- Lawyers Association for Human Rights for Nepalese Indigenous Peoples (LAHURNIP) (Nepal)
- Asia Indigenous Peoples Pact (AIPP) (Asia regional)
- Instituto de Defensa Legal (IDL) (Peru)
- Association Okani (Cameroon)
- Réseau des Populations Autochtones et Locales pour la Gestion des Ecosystèmes Forestiers d'Afrique Centrale (in English: Network of Indigenous and Local Communities for the Sustainable Management of Forest Ecosystems in Central Africa) (REPALEAC)
- United Organisation for Batwa Development in Uganda (UOBDU) (Uganda)
- Cheptikale Indigenous Peoples Development Project (CIDPD) (Kenya)
- Sengwer Indigenous Peoples Programme (SIPP) (Kenya)



Asia Indigenous Peoples Pact



Chepkitale
Indigenous
People
Development
Project



New Wind Association (Finland)
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Individuals
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