

IMPLEMENTATION UPDATE:

WWF Management Response to Recommendations
from the Independent Panel Report

Embedding Human Rights in Nature Conservation: From Intent to Action

30 NOVEMBER 2021

WWF commissioned an Independent Panel in March 2019 to review how we addressed alleged human rights abuses by some government rangers in Central Africa, India, and Nepal. It was chaired by former UN High Commissioner for Human Rights Navi Pillay and included Dr Kathy MacKinnon and Professor John Knox. The Panel's review was completely independent, and the Panel had unfettered access to WWF's staff and documents. [We published the Panel's report in full on 24 November 2020](#). Although it found no evidence that WWF staff were involved in human rights abuses, it was unsparing in its conclusions that we fell short of what is expected of us and that we need to do better. WWF fully condemns violations of human rights and is determined to do more to make communities' voices heard and to advocate for their rights.

The Panel made 29 recommendations regarding the country-level programmes it reviewed as well as 50 general recommendations. WWF published a [Management Response](#) detailing how we will address the recommendations, building upon our own self-assessment, lessons learned, and work underway. In January 2024, following three years of implementation, we will undertake a formal review of WWF's progress in realizing the commitments made in the Management Response.

We are resolved to deliver better outcomes for people through our work, and to consistently listen, learn, and adapt to ensure we are always moving towards that goal. We are monitoring progress and posting update summaries on our global website, [panda.org](#). Many of the Panel's general recommendations contained overlapping or related suggestions, and many of our actions address multiple recommendations at the same time. As such, we cluster our update into four categories:

- enhancing our [governance](#) structures to ensure we ourselves move from intent to action;
- implementing the [Environmental & Social \(E&S\) safeguards framework and office of the Ombudsperson](#) as key pillars to uniformly move towards an inclusive approach and effective community engagement in all of our field operations;
- taking steps to reduce conflicts between communities and conservation [law enforcement](#); and,
- leveraging our agency to [influence government partners](#) regarding human rights issues.

Since the Panel's report was published, we have worked hard to make progress in these global areas and in country. This update outlines the progress we have made to date and acknowledges the work we still must do. We recognize that we are on a journey and it will take time to realize all the outcomes that are needed. We are committed to continued growth, learning, and transformation as an organization so that we can deliver positive outcomes for people and nature.

Our efforts to advance our vision—a world in which both people and nature thrive—are based on the fundamental principle that positive outcomes for both people and nature depend on firmly integrating human rights into conservation practices. Our mission takes us to some of the toughest places in the world, where conflict takes place on a daily basis—conflicts between communities, with governments, and with wildlife. These places also happen to be the top regions for biodiversity and global ecosystem services, including carbon sequestration and climate regulation.

WWF cannot guarantee human rights violations will never happen in these places. The protection of human rights is a government responsibility. But as a non-governmental organization (NGO) operating within these contexts, we have an unequivocal role to play in creating stronger enabling conditions for human rights; ensuring that communities co-lead the design, execution, and monitoring of conservation programmes; and influencing governments so that they fulfil their duty to protect the rights of their citizens. In some of these places, we have failed to do that well and consistently. We have listened and learned; we are working to implement WWF's Management Response to ensure we continuously do better; and we will partner with conservation, human rights, and development organizations to deliver better outcomes for all.

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CONTEXT

The dual crisis of climate change and biodiversity loss is an urgent threat to humanity. Securing nature and its services for future generations hinges on our ability to partner with and uphold the rights of the Indigenous Peoples and local communities who live in some of the most biodiverse places on the planet. They are often the ones who most directly depend on nature and therefore are among the most vulnerable people on Earth. They must be the drivers and beneficiaries of conservation efforts in their homes.

WWF has embarked on a journey to ensure we, as a federated network of organizations operating in over 100 countries, pursue fully inclusive conservation consistently. Our aim is to ensure that our paradigm and practice of conservation put peoples' needs, rights, and aspirations at the centre of what we do, recognizing that humanity's future depends on a healthy planet, and that conservation depends on delivering responsible, equitable, and just approaches for communities. The Management Response to the Independent Panel's review is a key guide in this journey.

To inform our Management Response, WWF carried out a series of consultations focused on community development and human rights. This included one-on-one consultations with experts from various NGOs as well as public consultations. Among the guiding questions were: How do we change our paradigm and practice of conservation to put peoples' needs, rights, and aspirations at the centre of what we do? How do we ensure that people and nature are co-equal in the future we strive to create?

We heard that conservation groups, including WWF, have not always pursued a rights-based and inclusive approach to conservation in all places and at all times. Some of the key recommendations for conservation organizations emerging from our consultations with human rights and development groups include:

- We must recognize that we need to engage communities with humility and listen carefully, including when receiving difficult feedback.
- People-centred conservation should not only be about managing risks, but also about improving the welfare of people. We cannot be successful in delivering environmental objectives if we do not also generate positive social and economic impacts.
- We must address the major conflict/trade-off challenges for conservation and development—the tension between short-term livelihoods and long-term sustainability and conservation. We should engage more fully with partners and build the capacity to address livelihoods, welfare, and immediate needs of local communities as we seek to safeguard the natural world.
- A vibrant civil society is fundamental. In many countries the civic space is shrinking, and international partners like WWF are uniquely placed to shed light on the challenges facing civil society, project issues out to the global community, and use global agency to advocate for local communities. Speaking out at any level can be risky; we should join with others to manage the risks.

WWF is addressing these findings in our work to foster a more inclusive approach to conservation everywhere we operate, including through our efforts to implement the Management Response¹. While this update outlines the steps we have made in the first year, there is much more work to do, and it will take time to achieve the tangible on-the-ground benefits for local communities that we seek. We face significant challenges, which are compounded by the broader and often complex social and political contexts in the places where we work. Even as we make advances, our efforts are tested by long-standing tensions and inequities. We will continue building the partnerships and momentum needed to drive lasting change. As we do so, we will continue to listen carefully to local communities and partners, learn from progress made and challenges encountered, and adapt to ensure we are delivering better outcomes for all.

¹ Details on our implementation arrangements can be found in [Annex 1](#).

PROGRESS ON COUNTRY-LEVEL RECOMMENDATIONS

Central African Republic

Over roughly three decades of working in the Dzanga-Sangha Complex of Protected Areas (DSPA) in the Central African Republic (CAR), WWF has learned lessons that we are now applying to other countries in the region. In particular, the Human Rights Centre (HRC) has been identified as a potential model for third-party managed grievance mechanisms. The Panel viewed *“WWF’s support for and cooperation with the independent HRC as a positive development, both in terms of providing a mechanism to respond to grievances involving the DSPA, and more generally in generating awareness of human rights, access to justice and civic empowerment of the members of marginalized communities living in and close to the DSPA. The HRC makes a valuable contribution to inclusive conservation...”*

In response to the Panel’s recommendations, WWF committed to building on and supporting existing measures in the DSPA. First, WWF committed to improving the ongoing human rights training it provides to rangers with the support of its safeguards experts and employing good international practices. Second, WWF committed to working towards improving the sustainability and independence of the Human Rights Centre within Dzanga-Sangha. To those ends, WWF:

- **Supported the Human Rights Centre.** WWF helped set up and continues to support the Human Rights Centre in Dzanga-Sangha and is working closely with the Sangha Tri-National Trust Fund (FTNS)² to incorporate the Centre as an integral part of the future Dzanga-Sangha Foundation and to ensure that the running costs of the Human Rights Centre are covered as a specific budget line item.
- **Partnered in ranger training.** WWF-CAR signed an agreement with Chengeta Wildlife³ regarding the training and continuous mentoring of rangers in DSPA. In partnership with WWF, Chengeta Wildlife has developed a training programme for rangers that integrates human rights and social policies based on international norms. In addition, the training programme includes an official Ministerial Order that outlines specific rules of conduct in matters of moral integrity and professional ethics and reinforces respect for human rights and Indigenous Peoples. Phase one of the training programme was completed in July, phase two begins in October, and all rangers should be trained on human rights by the end of December 2021.

Cameroon

In Cameroon, our commitments included reviewing and revising WWF-Cameroon’s strategic plan to ensure that it is fully functional and integrates WWF’s E&S safeguards framework, addresses social commitments, and draws on consultations with Indigenous Peoples and local communities. We also committed to advocating that government partners, including the Ministry of Forestry and Wildlife (MINFOF), protect human rights in south-eastern Cameroon. Buttressing these efforts, we committed to strengthening a grievance mechanism administered by a third party, continuing our ongoing efforts to promote communities’ access rights, and closely monitoring progress on implementation of these commitments. In January 2021, WWF organized workshops with key rights-holders and stakeholders in Cameroon to present the findings of the Independent Panel and invite qualitative feedback on our intended actions; the conversations informed follow-up initiatives in country. Since then, WWF has been:

- **Addressing access rights.** After over a decade of dialogue, MINFOF and ASBABUK, an Indigenous Peoples’ association, signed an agreement in 2019 for greater access rights to the national parks of Boumba Bek, Lobéké, and Nki. This was an important first step to restoring access rights for the Baka Indigenous People. Following the signing, MINFOF and ASBABUK were required to lay out detailed rules and regulations for implementation. This occurred through a participatory process over several

² [Sangha Tri-National Trust Fund \(FTNS\)](#) provides long-term funding for the conservation, eco-development, and cooperation activities of the Tri-National de la Sangha (UNESCO World Heritage Site), which includes Dzanga-Sangha in CAR.

³ [Chengeta Wildlife](#)’s vision is to provide locally led and lasting wildlife protection that recognizes humans as part of the ecosystem.

months and resulted in an agreement that the Baka chiefs signed. It permitted the Baka to enter the park for traditional purposes, which included cultural and spiritual use of the forests, as well as hunting (at prescribed times of year for species used for food), fishing (with regulations to ensure sustainability, such as no use of poison), and harvesting of non-timber forest products. The agreed-upon rules specified the Baka would inform the park authorities of their access and usage on a regular basis via a community relay system. Implementation has, however, been uneven. This is due to a variety of reasons, including:

- awareness. Not everyone is aware of the rules and responsibilities, both on the part of communities and rangers.
- ethical enforcement. Rangers must be fully aware, trained, and held accountable for the ethical implementation of their duties and the protection of human rights. This is essential to establishing the foundational trust required for the access system to operate effectively.
- capacity. The community relay teams responsible for interfacing with the government have weak capacity, often live in extremely remote areas, and are not always familiar with the full terms of the agreement.
- representation. The agreement is currently being implemented with the support of ASBABUK, an association representing the Baka People resident in the area. As per the arrangement, a representative from each community is assigned to discuss and speak on behalf of community members on issues related to natural resource management in the park. In return, the representative reports back to the communities and receives guidance and advice from the communities for decision making. At present, ASBABUK board members do not have the means to maintain this regular—and vital—feedback to their peers, which has led to concerns on how to ensure meaningful representation.
- scope. The agreement applies to areas where WWF works in the national parks, but issues remain regarding access for the Baka to the much larger swathes of private lands outside of the parks, including forest concessions and hunting areas.

WWF will continue to explore solutions with government, communities, and civil society as we all learn and adapt in implementing this historic MOU, including how the lessons learned could help communities address the issue of access to adjoining private lands in the future and adjusting management over time in accordance with community needs.

- **Supporting complaints mechanisms.** As indicated in the Management Response, WWF committed to support landscape-level grievance mechanisms in Boumba Bek, Lobéké, and Nki national parks in south-eastern Cameroon. This is in addition to WWF-Cameroon’s country-level grievance mechanism. The Lobéké mechanism is managed by CEFAID, a Cameroonian civil society organization focused on the sustainable management of natural resources. We recognize that the mechanism needs to be strengthened. CEFAID has faced resource and capacity challenges, in addition to challenges reaching the remote communities in the vast landscapes in which it operates. We will continue strengthening this process and look to learn from the Human Rights Centre in CAR as we proceed. In the past year we have secured resources from the German government to help do so. We continue to work with the National Human Rights Commission of Cameroon and RACOPY, a multi-stakeholder platform that serves as a broad coalition to defend and advocate for Indigenous Peoples’ rights, to strengthen the operations of grievance mechanisms in Lobéké and throughout south-eastern Cameroon. This support includes new and ongoing processes to engage Indigenous Peoples and local communities with the goals of establishing additional landscape-level grievance mechanisms and ensuring all mechanisms continuously evolve to meet communities’ needs.
- **Developing a coordinated strategy.** The overarching conservation strategy for WWF-Cameroon was recently finalized. It incorporates feedback from local rights-holders and stakeholders, lays out our approach to working with Indigenous Peoples and local communities, and places a major focus on the institutionalization of our E&S safeguards. In addition, a draft socioeconomic strategy has been developed based on extensive consultations between January and June 2021 with Indigenous

Peoples and local communities in the landscapes where WWF-Cameroon operates. As noted in WWF's Management Response, a social development officer for Lobéké National Park was appointed in October 2020. The job holder now works closely with WWF-Cameroon's National Indigenous Peoples Coordinator and the regional E&S safeguards head. WWF-Cameroon also emphasized its commitment to social development and safeguards, and pressed for better government protection of human rights at a high-level ministerial visit in March 2021 to Lobéké National Park.

- **Improving ranger training.** In February 2021, WWF-Cameroon convened a multi-stakeholder workshop that included the conservators of protected areas in south-eastern Cameroon, magistrates, police officers, gendarmes and customs agents, local civil society organizations working on human rights issues, the lawyers bar association of Cameroon, and the National Commission on Human Rights and Freedoms to review ranger training so it better addresses human rights. Following this workshop and based on the arising recommendations, supplementary multi-stakeholder training on human rights was conducted for rangers, community members, and military personnel in south-eastern Cameroon in April 2021. WWF-Cameroon has also advocated for further measures to improve professionalization of the ranger workforce. These include promoting the [Spatial Monitoring and Reporting Tool \(SMART\)](#) and developing an action plan to strengthen capacity for monitoring, patrol effectiveness, and human rights based on an evaluation conducted in April 2021.
- **Supporting the development of a unified code of conduct, disciplinary consequences, and incentives for government rangers.** WWF supported the efforts of a government working group in developing a unified code of conduct, including disciplinary consequences for government rangers, in alignment with WWF's standards and international norms. The code of conduct, which will serve as a model for all protected areas in the country, was approved by the government of Cameroon in October 2021. WWF is further supporting MINFOF in developing a revised bonus system for government rangers to be applied by the government as part of the revised code of conduct implementation. The proposed system would incentivize rangers to protect human rights while performing their conservation functions, and to focus on the activities of major poaching syndicates instead of potentially minor legal infractions by local communities.

The interventions we are making are interdependent, and to register the impacts we seek, progress must be made across all areas. Access rights cannot be advanced in isolation without also ensuring law enforcement is conducted ethically and in a manner that protects human rights, particularly of the Baka. We recognize that progress will continue to be uneven and take time. The tensions and mistrust between the Indigenous Baka people, government authorities, and majority Bantu population have deep roots. As WWF and others continue to support measures aimed at helping the Baka and other Indigenous Peoples address social inequalities and other asymmetries, challenges will emerge that need to be carefully addressed to build the trust required for successful long-term community-based conservation. This includes negotiating conflicting priorities between park authorities, communities, and funding agencies, and will require more organizations than WWF alone to drive change. We are actively seeking collaborations and solutions.

Democratic Republic of the Congo

As stated in the Management Response, in the Democratic Republic of the Congo (DRC), WWF conditioned future engagement with the Congolese Institute for the Conservation of Nature (ICCN) on establishing a new partnership that better integrates human rights and accountability. A partnership with a local human rights organization was also required to establish a third-party grievance mechanism. We further pledged to work with government to expand forest-use rights for Indigenous Peoples and local communities in the landscapes around Salonga National Park. We also committed to opposing involuntary resettlement of communities in the park. WWF has addressed these commitments in the following manner:

- **Advocating for systemic changes regarding human rights protections in the context of conservation activities in the DRC.** There is a general recognition of the need to strengthen human

rights protections in the DRC. A multitude of actors—including the government of DRC, donors, and other conservation and development organizations and community representatives—are needed to effect change. While the German government and ICCN engaged in active dialogue on human rights and conservation in the DRC, which intended to lay the groundwork for policy, reform, and the creation of operating conditions that help ensure the protection of human rights, we also maintained a dialogue with ICCN in which we similarly pressed for systemic changes to strengthen protections by the government.

In 2021, as a result of these engagements, ICCN set up an internal directorate to oversee compliance with human rights obligations throughout all national parks and to ensure that cases of human rights malfeasance are escalated, reviewed, and addressed. Additionally, a director with requisite experience in human rights was appointed and is in the process of developing standard operating procedures and an accompanying action plan. Amongst other measures, ICCN is designating human rights focal points in every national park. A number of donors have expressed interest in supporting ICCN in this undertaking. Establishing this directorate is a step forward that signals a potential cultural change. Such sweeping reforms take time, but progress is promising.

There is also growing civil society coordination to collectively address the challenges faced by some of the country's most vulnerable communities as was demonstrated in February 2021 following [interethnic violence near Salonga National Park](#). We acted with partners to mobilize emergency relief support for those impacted and also issued a joint declaration that called on the DRC government to (1) urgently conduct an independent enquiry to identify and prosecute those responsible for any criminal acts, and (2) urgently ensure the safety of the communities and their property.

- **Reaching an agreement with ICCN.** WWF negotiated a new Partnership Agreement that met the conditions laid out in the Management Response, including that all law enforcement operations and activities are compliant with WWF's Principles for Enforcement and Rangers and that the guide of conduct applies to all ICCN staff responsible for law enforcement. The agreement places a strong emphasis on the protection of human rights and stipulates measures to professionalize law enforcement to meet human rights provisions in line with international standards, and to create a third-party grievance mechanism and support system, to be managed by a local human rights NGO. It also is explicit on ensuring that no involuntary resettlement will take place for local and Indigenous populations currently residing in the Salonga National Park, in accordance with WWF's E&S safeguards framework. With the agreement in place, we will explore with ICCN and other stakeholders over the coming 18 months the feasibility of establishing a foundation to manage Salonga National Park to help advance inclusive conservation, sustainable development for local communities, and respect for human rights.
- **Launching an inclusive process for developing a third-party managed grievance mechanism in Salonga National Park.** Following a search process, we entered into a partnership with the local NGO Juristes pour l'Environnement au Congo (JUREC) to manage the grievance mechanism. WWF developed a framework for the forthcoming grievance mechanism using international good practices (i.e. being a legitimate, accessible, predictable, equitable, and transparent mechanism). In particular, the framework is designed to help ensure the grievance mechanism is based on engagement and dialogue, managed by an external organization not involved in the park management, and implemented through community monitors—members of the communities who can bring forward any complaints to the grievance mechanism manager, thus ensuring that the mechanism is accessible for all community members, including those who are unable to read or write. JUREC initiated community consultations in July 2021 to further guide the design of the mechanism and ensure it meets local needs and expectations. While this is being finalized and rolled out across the park, grievances can be lodged within the country-level grievance mechanism.

- **Increasing community participation.** We are currently exploring an opportunity to partner with University College London (UCL) to bring the ExCiteS (Extreme Citizen Science) programme to Salonga. The main goal of this programme is to cultivate active community member involvement in monitoring, observing, and recording events or changes near their communities. Over time, community monitoring is expected to help reduce both poaching and misconduct from government rangers. WWF is looking to strengthen participation of Indigenous Peoples and local communities in Salonga National Park governance through the decentralized Site Coordination Committees (CoCoSi).
- **Advancing professionalization of law enforcement.** A third party, Chengeta Wildlife, has been training ICCN staff in the field on the guide of conduct, human rights laws, safe and appropriate apprehension of armed poachers, and community engagement and rights, among other topics. Chengeta Wildlife has experience across Africa in professionalizing ranger teams, including addressing human rights. Going forward, a major focus will be working with the government to reconfigure law enforcement to reduce risks of human rights abuses. Beyond training, Chengeta Wildlife will explore how to build more equity and inclusiveness in ranger teams (e.g. increase the number of female rangers and rangers from Indigenous communities). Building on the existing SMART programme, Chengeta Wildlife will also work with ICCN to increase accountability, including through the use of control rooms, mentoring during patrols, and spot checks.
- **Rolling out the guide of conduct.** As signalled in the Management Response, we had co-developed a guide of conduct with ICCN for government rangers in Salonga based on international norms, which would also serve as foundation for reviews and improvement of nationally agreed codes of conduct and procedures. All ICCN rangers working in Salonga are now required to sign the guide of conduct, and rangers are to be reminded of its contents prior to undertaking patrols. A pocket version, also in local languages, is available and currently being distributed to all rangers.

As stated in the Management Response, going forward, the major focus of WWF investments in Salonga will be on community eco-development. This includes assisting communities to secure rights and access to land and resources through Community Forest Concessions (CFC) and resource use agreements; supporting community-led models for development and land use management that improve the livelihoods of local communities while also contributing to the conservation of Salonga National Park; encouraging and supporting local development committees (LDCs) and other local bodies such as Rural Agriculture Management Councils to promote good governance by implementing development plans and sustainable natural resource management plans; and, supporting inclusive income generating activities.

Progress will take time. As mentioned above, areas in the Salonga landscape have been subject to conflict in recent years and the risk of conflict re-emerging remains. Inclusive conservation efforts must be pursued in a manner that recognizes the historical inequalities and tensions between different groups, and that builds trust. As the work progresses, there is a need at a national level to address issues such as access to parks and to deal with questions that are currently a source of conflict. Much of the area outside Salonga National Park is forested, and there is a major opportunity to transfer forest use rights to communities as provided for in DRC legislation. WWF has advocated for this, supported the transfer of over 170,000 hectares of land already, and will continue to accelerate transfers through the implementation of our new partnership agreement. An additional challenge in Salonga remains its remoteness, which results in particularly weak governance and further compounds issues relating to the supply of basic services and necessary protections for citizens, including access to justice and rule of law. Recognizing that we have committed to operate in this environment, we know we need to work with partners to ensure resources are available and allocated to improving the conditions necessary for inclusive conservation and rights-based sustainable development.

Republic of Congo

In the Republic of Congo (ROC), where WWF's work is focused in the Espace TRIDOM Interzone Congo (ETIC) and Ntokou-Pikounda National Park (NPNP) landscapes, we committed in the Management Response to support the development of a code of conduct for rangers, step up efforts to train government rangers in

human rights protection obligations, incorporate human rights in our MOU with the government when renegotiated, and to strengthen our engagement with communities through the development of a multi-stakeholder platform and an improved grievance mechanism. In line with these commitments, and with feedback received from local rights-holders and stakeholders through focused consultations in early 2021, WWF has taken the following actions:

- **Strengthening our engagement with Indigenous Peoples and local communities.** We continue to support our engagement with Indigenous Peoples and local communities through multi-stakeholder platforms and other activities. This includes advocating for the inclusion of more Baka community members in government ranger teams and hiring Indigenous Peoples liaison officers, among other efforts. To empower local Baka communities, we are starting a collaboration with University College London (UCL) to bring the ExCiteS (Extreme Citizen Science) programme to the ETIC landscape. Through it, Baka communities will codesign environmental monitoring approaches with ExCiteS facilitators.
- **Supporting Free Prior and Informed Consent (FPIC) in Messok Dja.** As stated in the Management Response, we successfully advocated for an FPIC process in Messok Dja. This is the first time in the country's history that the government has accepted such a process, and FPIC is now required under Congolese law when creating new protected areas. The government-led FPIC process in Messok Dja is being supported by a consortium of NGOs headed by Nature+, a Belgian NGO. Formal consultations began in October 2021, and we continue to support this FPIC consortium as a resource and observer. The Ministry of Forest Economics has proposed a new protected area be created; whether this happens or not, together with the extent of protection and governance structure, will be influenced by the local communities through this process.
- **Improving the grievance mechanisms.** Grievance mechanisms launched in the ETIC and NPNP landscapes in 2017 and 2019, respectively. Implementation of the ETIC mechanism shifted to a local multi-stakeholder platform (comprised of representatives from local communities and Indigenous Peoples, local authorities, local associations, etc.) when it was formed in 2019. A similar multi-stakeholder platform was recently established in Ntokou, and that platform has taken responsibility for implementing the grievance mechanism there. In Pikounda, the grievance mechanism is managed by the NPNP Community Engagement Team as the local multi-stakeholder platform is still being formalized. All of these grievance mechanisms are open to anybody, designed to respect confidentiality if requested, and can receive complaints in any official ROC language or the mother tongue of the affected party. Complaints are sealed or countersigned by the authority (chief or secretary) of the affected party's home village and then given to the relevant government official (ETIC National Coordinator or NPNP Director). For people who cannot read or write, accommodations are made to record oral disputes and put them in the format required for the mechanisms; for example, the ETIC community liaison officers and a social worker make periodic visits to Baka communities to collect their complaints.
- **Advancing E&S safeguards implementation.** The ETIC Landscape, including the proposed protected area of Messok Dja, was screened for risks and identified as having special considerations⁴ and elevated risks. In 2021, we sought external input and conducted stakeholder consultations, carried out an environmental and social impact assessment, and began developing a mitigation framework. As part of the assignment, the team spent time in the field engaging with stakeholders directly. In August 2021, both the draft impact assessment and mitigation plans were presented during a restitution meeting to key stakeholders in the landscape, including affected local communities and Indigenous Peoples. The mitigation plan is expected to be finalized in December 2021. Several activities identified in the mitigation plan are already underway, including human rights training for rangers, while others await

⁴ As per our E&S safeguards framework, special consideration landscapes are those with potential for significant adverse social or environmental impact because they are in fragile or conflicted states, in regions with significant histories of systemic human rights abuses, or have multiple risks that are complex and compound each other.

formal approval and funding. WWF has also completed the screening for NPNP, which is currently undergoing review for approval.

- **Revising the ETIC MOU.** In February 2021, WWF and the government signed a one-year extension of the ETIC agreement to provide time to facilitate a joint evaluation of the agreement and revise it to incorporate human rights principles. A joint action plan was agreed in March 2021 in Brazzaville. Government actions have been delayed slightly with the post-election transition, but WWF still aims to conclude this process in February 2022.
- **Supporting a code of conduct and disciplinary consequences for government rangers.** The Internal Rules for ETIC include the elements of a code of conduct for rangers, which have been in operation since August 2020. We continue to advocate for the government to adopt the code of conduct at the national level. In addition, WWF has used its agency with the ETIC disciplinary committee to advocate that appropriate investigations, review of allegations, and sanctions for misconduct of rangers are carried out. To mitigate against the risk of abuses on patrols, we continue to support the participation of independent observers during ETIC patrol missions, as well as the ongoing training of rangers on human rights and customary use rights in line with the recently developed curriculum.
- **Supporting WWF-ROC.** In line with our commitment to support this work in ROC, we are strengthening the local team with ongoing recruitment of three critical positions: Country Coordinator, Finance Manager, and Conservation Manager. In addition, we added a senior legal counsel focused on Africa to our international legal team (November 2021), who will work closely with the Africa regional and ROC country teams to review and revise landscape and national agreements to ensure they reflect human rights commitments. In addition, we continue to build internal understanding and capacity on social policies and WWF guidelines in ROC and the region.

There is a deep-seated lack of trust between communities, rangers, and other government authorities and conservation organizations in many areas of ROC. WWF faces a significant challenge in trying to create inclusive conservation and shift the paradigm of conservation in the country. To do so, the government, WWF, and other conservation, human rights, and development organizations must address the longer term needs and issues of local communities, including Indigenous Peoples. Some progress has been made, but much more work must be done. WWF and other conservation organizations are finding themselves having to fill roles traditionally fulfilled by the government and development-focused organizations. For example, the ROC government is responsible for providing compensation to communities if elephants or other wildlife destroy communities' crops. But should the compensation not be delivered in a timely fashion (due to several constraints), communities tend to turn to ETIC and/or WWF for their losses. ETIC has therefore set up an insurance scheme to provide some compensation. This has proven very popular with farmers, but the financial means are limited, and investments are needed to improve processing times. While this is one instance where ETIC has been able to provide an alternative, ETIC cannot replace government services and those of other civil society organizations. Civil society capacity in the ETIC area to support development remains weak. These are issues that need to be dealt with progressively.

Nepal

In Nepal, we committed in our Management Response to training our staff to identify and escalate concerns around human rights issues and ensuring there is an operational and accessible grievance mechanism for stakeholders and rights-holders who may be affected by conservation activities supported by WWF-Nepal. We also committed to working with the National Human Rights Commission of Nepal (NHRC) on ways to monitor progress and incidents around human rights relating to protected areas and to advance a national grievance mechanism. Finally, we committed to taking new and more proactive measures to strengthen the inclusion of marginalized groups in conservation. In the past year, we have made advances against these commitments, including:

- **Leveraging our influence.** As detailed in the [Third-Party Assurance](#) section below, WWF-Nepal pressed the government to take action in response to July 2020 media reports of incidents involving alleged abuses of the Chepang Indigenous People by government personnel in the Chitwan National Park area. This included engaging with NHRC and withholding WWF’s funding for conservation law enforcement support activities across Chitwan National Park. WWF took these steps even though the alleged incidents took place in areas of the park where WWF does not work. Since then, the Department of National Parks and Wildlife Conservation and the Nepali Army have transferred implicated personnel or suspended them from duty while investigations take place.
- **Beginning a process to strengthen the application of human rights principles in conservation work.** In 2021, WWF-Nepal conducted a joint consultation and assessment of human rights policy and practice gaps in Chitwan National Park and its buffer zone, working together with the Forum for Protection of Consumer Right Nepal and the NHRC. Based on the assessment, WWF and these partners are now developing a training manual with guidance and best practices for park authorities and buffer zone user groups. The draft training manual is undergoing final review after incorporating feedback received from consultation with stakeholders, carried out by NHRC, and is expected to be published in December 2021.
- **In coordination with NHRC and the Forum for Protection of Consumer Right Nepal, began exploring the feasibility of an independent national mechanism** to monitor and evaluate human rights issues in protected areas countrywide. If feasible, the mechanism will be launched in 2022.
- **Strengthening WWF-Nepal staff capacity on safeguards**, including the recruitment of a new Safeguards Specialist. This position, which was filled in February 2021 by a member of the Indigenous Chepang community, is supporting the full roll-out of E&S safeguards processes and mitigation plan activities in Nepal, and strengthening WWF’s country-level grievance mechanism. WWF-Nepal also strengthened internal procedures for vetting and reviewing E&S safeguards considerations, potential risks, and mitigation measures to ensure consistency with landscape-level safeguards analysis and mitigation plans prior to sign off on new projects. WWF’s social policies have been rolled out to all staff, and new staff receive orientation on social policies, E&S safeguards, and the grievance mechanism in line with WWF’s global efforts to build E&S capacity.
- **Advancing E&S safeguards implementation in landscapes.** The Terai Arc Landscape (TAL) was screened for risks and a mitigation plan was developed in 2021. As part of its stakeholder engagement and consultation with communities, WWF-Nepal has disseminated E&S safeguards information, including the TAL mitigation plan, widely and transparently, including posting on [WWF-Nepal’s website](#), as well as translation into Nepali of the E&S safeguards Risk Categorization Memo, TAL Mitigation Plan, and Grievance Mechanism. All staff were informed of the TAL mitigation plan, and the TAL field office received targeted training to support its implementation.
- **Instituting new requirements for WWF-Nepal sub-grantees.** Sub-grantees must now place complaint boxes in their offices and establish committees to review complaints. WWF-Nepal sub-grantee agreements were also updated to emphasize human rights, including provisions to prioritize the following vulnerable and marginalized groups in project implementation: Indigenous Peoples, women, children, disabled people, and human-wildlife conflict victims. WWF-Nepal is carrying out an effectiveness review of these provisions in Chitwan National Park.
- **Recruiting a former Justice of the Supreme Court and former Secretary of the Ministry of Forest and Environment to identify and address gaps in the inclusion of marginalized groups** from buffer zone management institutions and community-based forest institutions in the TAL landscape. The goal of this study is to identify which groups (e.g. landless farmers, Indigenous Peoples) are under-represented in community forest governance structures and, thus, more vulnerable to decisions that

may restrict their access to resources or other benefits. The final report will be published in 2022.

India

In the Management Response, WWF committed to ensuring that human rights are integrated into law enforcement training for government rangers and that we continue to demonstrate our respect for human rights. To this end, WWF-India has sought to build on its close collaboration with local communities and embed this approach across the organization as well as with key partners. Key advances made include:

- **Developing a Grievance Redressal Process (GRP).** Launched in November 2020, all relevant staff in the Head Office and in the field have been trained in the use of a grievance mechanism in accordance with WWF'S E&S safeguards and tailored for specific conditions in India. It has been translated into 12 languages and published on the [WWF-India website](#). Simple communication materials in local Indian languages have been developed to socialize this mechanism. WWF-India has also collated and put into locally accessible formats information on the different levels of government grievance mechanisms in the districts where WWF-India works, so that this can be shared with communities as the COVID-19 situation improves and unrestricted travel is once again possible.
- **Advocating for revised human rights training and a curriculum for the national ranger workforce.** India has a number of government-run ranger training institutes where frontline staff (including guards and rangers) of the Forest Department undergo training. WWF-India is working towards embedding human rights training into the curriculum of the ranger training colleges. Over the last two years (interrupted by COVID-19), WWF-India has conducted one national and four regional multi-stakeholder workshops to review and propose revisions to the existing curriculum of these colleges. There has been broad-based acceptance of the inclusion of human rights training into the curriculum, which will get final endorsement at the national concluding workshop to be held by the end of 2021. This will be a big step forward towards ensuring that all rangers passing through the system will receive human rights training. The training module for this will be prepared in consultation with human rights experts.
- **Strengthening internal safeguards capacity and orientation.** WWF-India has recruited a Safeguards Coordinator and Senior Social Development Specialist, both of whom will work closely with the landscape teams on the E&S safeguards roll-out. All staff received the E&S safeguards training, and additional special training has been provided for landscape teams on human rights and gender mainstreaming. All new recruits to WWF-India now receive an orientation on E&S safeguards and policies, including grievance redressal. WWF-India's third-party contracts have been modified to include aspects of human rights and E&S safeguards. Refresher training modules, including an ESSF quiz are being developed to ensure that this is embedded across all levels of the organization.
- **Completing E&S screening for priority landscapes.** WWF-India has been undertaking the E&S safeguards roll-out on a continuous basis, starting with priority landscapes. Most of the key landscapes have been screened, including the Kaziranga-Karbianglong Landscape (KKL). We will continue to move ahead with E&S safeguards implementation across our field programmes.

PROGRESS ON GENERAL RECOMMENDATIONS

Network Governance

As we shift to deliver more inclusive conservation and champion equitable sustainable development, we need to ensure consistency across the various legal entities that comprise our network. We thus embarked on a series of governance enhancements with the ultimate aim of supporting communities, improving conservation outcomes, and advancing rights-based approaches and equitable sustainable development everywhere we work. These enhancements deal amongst other things with safeguards, implementation of

our social policies, the escalation of community grievances through our systems to resolution, and the means for addressing non-compliance by WWF offices, including as an ultimate sanction the withdrawal of WWF licensing and operating agreements to network organizations. Progress on strengthening our governance includes:

- **Appointing an Ombudsperson.** Appointment of an Ombudsperson was recommended by the Independent Panel of experts and committed to by WWF in our Management Response. This reinforced the initial undertaking by WWF to appoint an Ombudsperson in our 2019 E&S safeguards framework. Following an extensive recruitment process, we appointed Gina Barbieri to the position with effect from September 2021. The Ombudsperson is independent of WWF International line management and reports directly to the President of WWF International with support from an International Board subcommittee. The Ombudsperson is developing the policy framework which will define how complaints relating to human rights and social and environmental impacts will be addressed, taking into account remedy-enabling ecosystems, and how the work of the Ombudsperson will contribute to institutional accountability and learning. This process is being conducted in consultation with internal and external stakeholders. The office will also hold a public consultation process prior to finalizing the framework and before approval of the framework by the Board.
- **Increased influence of Indigenous Peoples' perspectives throughout WWF and on the International Board.** In the Management Response, WWF committed to establish an Indigenous Peoples' Advisory Group to be a regular resource for the International Board and Ombudsperson functions. We are establishing a Diversity Equity Inclusion (DEI) Leadership Group, including representatives from across our governance bodies and geographies, which will develop proposals on key elements and processes for DEI work across the network in early 2021, and we made the decision to expand the number of members on the International Board. WWF is committed specifically to include members from Indigenous and First Nations People.
- **Network-level Conservation Quality Committee (CQC):** Having put into place an E&S safeguards framework, we needed to establish a mechanism for quality control and assurance. Accordingly, we created the CQC in February 2020 to focus on field-level risks and implementation of safeguards on behalf of the WWF Network Executive Team. It is comprised of a group of highly experienced and regionally representative WWF CEOs and conservation directors. Since publishing the Management Response, we appointed a senior staff member with safeguards experience as Secretariat to the Committee, and later added the Director of Safeguards and Human Rights as a permanent member. CQC meets regularly, and over the past year has focused on the following areas:
 - High Risk Projects—CQC reviewed and approved with conditions a total of 18 high-risk projects in the period November 2020-October 2021 from countries including Cameroon, CAR, DRC, Myanmar, and ROC.
 - Policies, Standards and Guidance Notes—CQC has established a new task force to review and recommend for approval additional network-wide guidance (e.g. Free Prior and Informed Consent (FPIC) primer).
 - Implementation of Environmental & Social Safeguards in Landscapes—CQC reviewed safeguard risks screens, mitigation measures, and work in specific landscapes, and reviewed E&S safeguards implementation in all the landscapes investigated by the Independent Panel. CQC will review the final mitigation plans for those landscapes by April 2022.
 - Country-level Action Plans—CQC approved country-level Action Plans for the WWF offices reviewed by the Independent Panel and is now monitoring their implementation.
- **Established network-wide values, core standards, and compliance measures.** As mentioned in the Management Response, we updated our values and linked them to core standards for conduct to guide a cultural change across the organization and serve as a reference for staff in day-to-day decision making. This was viewed as an important “guiding star” for our decentralized network. As of

February 2021, all independent boards across the WWF network have adopted a network-wide set of values and core standards. We further developed network-level accountability measures to ensure that all national organizations adhere to these values and core standards. All national organizations are now required to assure compliance with the core standards by: (1) obtaining a statement of support for the values and associated core standards from its board chair; and (2) obtaining an annual attestation of compliance with the values and core standards from its CEO. We will offer regular training and facilitate a peer exchange and review programme designed to build capacity and best practices for the implementation of values and core standards. If any WWF office fails to address violations of the values or core standards, they will be held accountable to the network through a formal mediation and escalation process.

Field Operations and Safeguards

To help more uniformly deliver on the recommendations of the Independent Panel and the findings from our own consultations, WWF recognized the need for a consistent framework to facilitate action, including ensuring local community engagement in the design, implementation, and monitoring of field projects, fostering inclusive approaches and respecting human rights. We selected and adapted the E&S safeguards framework because it provided a clear means for implementing our commitments towards inclusive conservation and human rights. WWF's E&S safeguards builds on the IFC Performance Standards⁵, and are consistent with the UN Guiding Principles on Business and Human Rights⁶. We then required that every individual governing body within the WWF network formally approve the adoption of E&S safeguards. Every office within the network has adopted the WWF values and core standards, including those on human rights and Indigenous Peoples. E&S safeguards provide the primary system for identifying, assessing, and mitigating social and environmental risks within our field-based work.

We have sought to consistently integrate conservation and development into our field work and have made major investments in social and economic development. This work is a core foundation for field-based conservation, as livelihood development is often one of the main priorities of local communities. We recognize the need to attend to the basic needs of communities first (or simultaneously) in order to work towards conservation objectives. Because livelihood activities require a different skill set than conservation, we often partner with development NGOs that can provide this type of support (e.g. training in financial skills and tools to understand the household economy, how much income new activities could generate, etc.). Mapping the human development side carefully and using that information alongside a rights-based approach can improve the design of livelihoods projects, which is critical to ensuring inclusive conservation. We designed our E&S safeguards framework to not only achieve risk mitigation but as a tool to more consistently deliver better and more inclusive conservation. As such, a livelihoods-based approach is fundamental to our E&S safeguards framework.

The following progress has been registered in implementing this framework across our field operations:

- **Carried out a public consultation on social commitments and safeguards.** We launched a six-week public consultation in May 2021 on our social commitments and safeguards system. It was the first time we conducted a consultation on our policies, and external stakeholders welcomed the opportunity to provide input. We listened carefully and took their feedback to heart. This consultation was undertaken in addition to the broader consultation we have been undertaking with

⁵ [IFC's Environmental and Social Performance Standards](#) define IFC clients' responsibilities for managing their environmental and social risks. These have been adapted and adopted by numerous development organizations around the world.

⁶ Before adopting the E&S safeguards framework, WWF analyzed how well it would address each relevant pillar of the UN Guiding Principles on Business and Human Rights (Ruggie Principles). Some pillars relate to the State's responsibilities as custodians of human rights protections, while others are relevant to entities that must respect those rights, such as WWF. The analysis also drew upon the UN Office for the High Commissioner of Human Rights "Implementing the United Nations "Protect, Respect and Remedy" Framework (2011)". It is important to note that the Ruggie Principles are a set of guiding principles for corporations to aim for and not a compliance system. WWF's new proposed E&S safeguards framework is a compliance system, and thus comprised of policies, procedures, guidance, tools, quality assurance, grievance mechanisms, and an independent monitoring and review function.

human rights groups and development practitioners on our social policies. For the purpose, we created a dedicated website (consultation.panda.org) with a feedback page available to all. Additionally, we organized virtual fora with representatives of human rights organizations, organizations representing Indigenous Peoples and local communities and their interests, other conservation organizations, safeguards experts, and the international development community. These efforts were supplemented by consultations conducted by individual WWF offices with local stakeholders. The consultation generated over 1,000 comments. These are now being reviewed, with policy documents being amended where appropriate and subsequently submitted to WWF's Network Executive Team and International Board for approval, a process that is scheduled for completion by March 2022. The revised policies will replace [the current versions that are currently available on panda.org](#). We will also publicly release an interim and final report of the overall public consultation process and commence disclosure of landscape-level information, as currently outlined in the [standard on disclosure](#). We recognize that in some places, because of constraints due to COVID-19, we could not engage Indigenous Peoples and local communities as directly and systemically as desired. This consultation should be viewed as an initial step in a process of continuous learning, and we will engage Indigenous Peoples and local communities for additional feedback on our policies and commitments as we engage with them in landscape-level E&S safeguards consultations.

- **Boosted capacity and expertise to operationalize E&S implementation.** Recognizing the commitments we've made are ambitious and require significant new capacities, we are adding new staff and building our own capacity in order to implement E&S safeguards fully. This includes:
 - As described in the Management Response, WWF-US and WWF International, as the two network entities directly managing country offices, have a combined safeguards team of 15 experts, who mentor a community of safeguard practitioners (approximately 50 staff whose jobs include duties relating to E&S safeguards implementation) and together lead the drive to implement E&S safeguards across the network. At the start of the reporting year, the network had three designated officials able to provide quality assurance and final approvals for safeguards risk categorizations and mitigation plans. Following extensive training, this group has been expanded through the accreditation⁷ of an additional 15 experts charged with performing due diligence functions. This has been a critical step to bolster the requisite internal capacity to operationalize the E&S safeguards. This past year, we also expanded the role of the Director of Safeguards to formally include human rights and appointed an IPLC (Indigenous Peoples and Local Communities) Focal Point.
 - As described in the Management Response, WWF trained all 7,500 staff members around the world on E&S safeguards utilizing a customized training module designed explicitly for this purpose. We have further made the training module a mandatory component of onboarding for all new staff across the network.
 - In 2021, WWF also delivered deeper technical training on understanding and implementing safeguards in the context of WWF's project cycle. The course was piloted in Germany, Switzerland, and Uganda, and then adapted to a 'train the trainer' format.
- **Established mechanisms to hear and address grievances.** In our consultations with human rights and development groups, we heard that fostering a culture among staff of being willing to hear about problems, even if it is difficult, was critical to building trust with communities. Grievance mechanisms were specifically identified as a means to provide accountability to communities as they provide a channel for stakeholders to raise concerns with WWF where they believe our policies have not been met during implementation. Holding regular meetings with communities and ensuring staff really know the communities with whom they work are also important methods for responding to grievances before they become conflicts. The E&S safeguards framework requires the

⁷ To support the accreditation and training programmes, WWF developed in 2021 several tools and guidance documents to help staff both practically apply E&S safeguards within their work and to navigate complex issues.

implementation of a grievance mechanism as a means of assuring accountability to communities.

In the Management Response, WWF committed to establishing grievance mechanisms at the country-office level in all countries in which we operate as well as landscape-level mechanisms in places with the highest level of risks⁸. As of November 2021, 48 offices (approximately 63%) have established country-level grievance mechanisms, and all offices are scheduled to complete this process by July 2022 in line with [our Speak Up! core standard](#). As mentioned in the Management Response, third-party managed grievance mechanisms have already been established in Lobéké National Park (Cameroon) and the Dzanga-Sangha Protected Area Complex (Central African Republic). A similar grievance mechanism is being established in Salonga National Park (Democratic Republic of the Congo). However, our ability to establish and support third-party managed grievance mechanisms hinges on the capacity of local organizations to implement. A longer term challenge is to provide sustainable funding for these mechanisms.

- **Sought guidance on human rights.** In addition to hiring an Ombudsperson, we committed in the Management Response to establishing a Human Rights Advisory Group. Following the public consultations mentioned above, we began the process of finalizing terms of reference and identifying members for the Group. This process is expected to be completed by June 2022. In the meantime, we have two human rights experts under contract to provide advisory services to our ongoing efforts, including the Human Rights Statement described in the [Third-Party section](#).
- **Expanded WWF International capacity on oversight, risk management, and assurance.** WWF International has added 11 new positions, including regional expertise such as a new Congo Basin Region Director, Africa Regional COO, and Senior Legal Counsel (Africa). As the home office for many Africa programme offices, WWF International has strengthened its management and oversight functions, particularly in managing high-risk projects, grievance mechanisms, transparency, and accountability. The WWF International Quality Assurance Committee, which supports leaders of country offices managed by WWF International in improving conservation delivery for greater impact, has met regularly since November 2020 and reviewed objectives, risks and mitigation measures for 67 proposals in that time, the majority of which are in Africa (76%).

The above supports the implementation of safeguards in WWF's field activities. Having put in place the necessary staff and systems, we have been able to increase our efforts to operationalize safeguards in the landscapes and seascapes where we work. **WWF has completed screening for environmental and social risks in 93 landscapes and seascapes and has advanced efforts underway in an additional 127 landscapes.** This includes all landscapes that were subject to review by the Independent Panel. Many of these offices are now beginning work on developing mitigation plans to address risks. Our E&S safeguards framework applies the principle of proportionality whereby mitigation actions and risk management are enhanced in places with weak governance, poor records on human rights protections, inadequate access to justice, or lack of rule of law. We have been focusing our efforts and dedicating resources within these areas, especially on work including engagement with Indigenous Peoples; where governments are proposing new resource restrictions for conservation that may impact local communities; and where we are providing funding and technical assistance to third parties (including governments and local communities) for conservation law enforcement.

As an example of how the process works, we describe here how WWF conducted the E&S safeguards risk screening process for the Terai Arc Landscape (TAL) programme in Nepal:

⁸ We are determining the need for landscape-level grievance mechanisms based on a suite of criteria, including if the landscape is in a country identified by the World Bank Group as a [fragile and conflict-affected situation](#) and high levels of risks are identified with respect to our E&S safeguards standards. Where countries are designated as conflict-affected states due to a localized or regional conflict, this requirement applies only when WWF's work is implemented in those conflict zones.

WWF conducted a broad stakeholder consultation process with Indigenous Peoples and local communities as a central part of the mitigation framework development process. The consultation deepened our understanding of project-related risks, helped assess the effectiveness of existing mitigation measures, and offered new insights on adapting project interventions to achieve more positive social impact. Diverse sections of Indigenous People and local communities were identified for consultation based on their specific socio-ecological features. A detailed mapping of Indigenous Peoples and other highly vulnerable, marginalized groups was overlaid with conservation threats and WWF priority sites to guide the consultations. Individuals, groups, Indigenous Peoples' organizations, and civil society organizations were included as respondents, allowing for a better understanding of the interests and perceptions of Indigenous Peoples and local communities.

A key finding from the stakeholder consultation process was that some groups of landless farmers, Indigenous groups, and other vulnerable people are not adequately represented in the governance and decision-making structures of the community forest management and buffer zone organizations. Consequently, they are more susceptible to being excluded from access to project benefits or affected by reduced access to natural resources. WWF-Nepal has begun work to address this issue at a landscape level by commissioning a study to identify and address gaps in the inclusion of marginalized groups from buffer zone management institutions and community-based forest institutions. The study will serve as a basis for policy advocacy to promote needed regulatory and governance changes. At the project and operational level, we will also implement capacity building programmes in buffer zones and community-based forest institutions to increase participation of marginalized communities and other vulnerable groups, strengthen project design accordingly, and institute stronger monitoring and due diligence procedures.

Support for Law Enforcement⁹

Conservation often takes place in remote areas with weak governance, conflict over access to natural resources, power inequities, and social insecurity. It is within this context that some government rangers have abused human rights, which WWF fully condemns.

Illegal wildlife trade is a key factor in conflict. The vast, illegal wildlife trade is driven by international markets and criminal syndicates with substantial financial resources. They have not only contributed to the serious decline in flagship species like tigers, rhinos, and elephants, but they also profit from wildlife and trade in wildlife products with little benefit accruing to communities. Meanwhile, some communities have ended up the casualty of law enforcement activities undertaken by governments to address wildlife crime, and in some countries, local sustainable use has been criminalized in ways that disfranchise communities. Inclusive conservation requires these issues are addressed. Because communities depend on critical social and economic assets from wildlife and natural resources, they often have a vested interest in ensuring their sustainable use. Law enforcement needs to be undertaken with a view towards incorporating communities into the enforcement mechanisms, respecting their rights, and safeguarding them from the activities of unscrupulous interest groups and criminals. Our work on enforcement seeks to make this paradigm shift possible.

As indicated in the Management Response, WWF has already adopted overarching Principles on Enforcement and Rangers, which were approved as part of the E&S Safeguard Standard 7 on Community

⁹ Wildlife crime is part of an organized and transnational network similar to the global drug trade. It generates billions of dollars in annual revenue that help fund militant and terrorist groups around the world. Interpol found 84% of countries surveyed reported convergence between environmental crime and other types of serious crimes including murder, money laundering, piracy, and drug and firearm trafficking. In some of the places where WWF operates, wildlife crime has supported the proliferation of arms, violence, and corruption. It has taken rangers' lives and robbed local communities of their natural resources. We recognize that environmental crime is a global and complex issue. In addressing it, we need to work closely with local communities, whether the work is led by communities, national governments, or others.

Health, Safety and Security. As part of our efforts to concretize our commitment to supporting ethical and equitable conservation law enforcement, we helped launch the [Universal Ranger Support Alliance \(URSA\)](#), a coalition of eight international NGOs, which launched its [five-year Global Action Plan](#) in July 2021. The Global Action Plan is designed to build a professional, accountable, responsible, and representative ranger workforce. The Global Action Plan is available on the URSA website in English, Portuguese, and Spanish, with translations underway in additional languages. Our work with URSA helps supplement our internal risk mitigation measures with respect to support for the ranger workforce.

Where WWF provides support for government-discharged law enforcement activities, we are committed in the Management Response to take additional steps to implement the necessary due diligence and frameworks to advance human rights protections by the responsible government entities. WWF:

- **Helped develop a reference code of conduct.** Working with our URSA partners, we supported the International Rangers Federation (IRF) to develop the first ever [global code of conduct](#), released in April 2021 following extensive review by conservation area authorities, ranger associations, conservation organizations, and human rights groups, including the UN Office of the High Commissioner of Human Rights, who wrote the foreword. Over 1,800 experts from more than 50 countries provided their feedback on the code of conduct in two rounds of global consultations. URSA also supported the IRF in developing detailed guidance, published in October 2021, to help ranger employers apply the code of conduct without diluting its provisions. To further support roll-out, URSA initiated a campaign to raise awareness of the code of conduct and guidance in 2021, which included the production of [a series of videos](#) and hosting workshops in multiple languages.
- **Implemented in-country training programmes.** WWF is working with multiple ranger colleges to incorporate human rights and relations with local and Indigenous communities in training curricula. For example, we are supporting the government of India in reforming the ranger training curricula in 28 training colleges and held four regional workshops across the country. In Cameroon, we have conducted human rights training for law enforcement agency staff (e.g. rangers, park managers) in Lobéké and Tri-National Dja-Odzala-Minkébé (TRIDOM) in collaboration with the National Human Rights Commission of Cameroon.

In addition to training rangers, WWF recognized in the Management Response that training on these topics should be provided to the judiciary and senior government officials. Such an undertaking would need to be led by other partners with expertise in this area. Because legal systems vary significantly from country to country and local partnerships are critical to success, we also understood that targeted efforts were needed rather than adopting a global, systemic approach. For example, in Nepal, WWF-Nepal has conducted training on human rights for law enforcement agency staff (e.g. rangers, conservation officers, police, Nepali Army, forestry officials) across all seven provinces in collaboration with the Judges Society of Nepal and the National Human Rights Commission.

- **Supported efforts to improve standards, training, and welfare for rangers.** WWF is working with URSA partners to develop a concise, globally agreed-upon summary of what a competent ranger must be able to do and a framework to help build trusting, harmonious, and respectful relationships with Indigenous Peoples and local communities (including what factors erode such relationships). These tools are aimed at rangers and their employer institutions in conservation areas and will build from experiences across governance types, including conservation areas under the governance of Indigenous Peoples and local communities. Currently, an advisory group is being created with representatives from the ranger workforce, Indigenous Peoples, local communities, and human rights experts, and a draft framework is expected in March 2022. This is intended to support the initiative for the professionalization of rangers, setting a broad benchmark for ranger competence and professionalism that can be clearly communicated, understood, and respected.

One of the challenges in addressing human rights in law enforcement is gender imbalances. Broader representation of women in ranger teams will likely have an impact in terms of reducing misconduct in the context of human rights. Working through URSA, we have been reviewing gender representation in ranger workforces and found that only 3-11% of rangers are women. The report titled [“Towards Gender Equality in the Ranger Workforce – Challenges & Opportunities”](#) was shared at the Ranger Roundtable hosted by the IRF in July 2021. The report is the first comprehensive and global analysis of the challenges in and opportunities for bringing gender equality into ranger workforces and is currently being translated into Spanish and French.

- **Strengthened WWF’s risk assessments and measures to design proportionate responses.** As noted in the Management Response, we developed the “Mitigation Planning Tool for Conservation Law Enforcement”, a due diligence tool, to help ensure our activities conform to our principles regarding support to law enforcement agencies and their staff. The tool is designed to assist offices in understanding local law enforcement and judicial capabilities, identifying related risk mitigation needs (including training and capacity), and tracking implementation requirements. In April-July 2021, it was reviewed and tested in eight countries (Cameroon, Kenya, Madagascar, Malaysia, Mexico, Nepal, Peru, and Zambia) and we are currently revising the tool based on those inputs. In early 2022, the updated tool will be applied where we are supporting third-party law enforcement activities and risks have been identified through the safeguards framework, as the tool serves as a starting point for developing specific risk mitigation measures.

While we continued to codify our law enforcement safeguards and guidance, we also enhanced internal capacity. We created regional wildlife crime hubs (i.e. East Africa Wildlife Crime Hub, Central Africa Wildlife Crime Hub, Southern Africa Wildlife Crime Hub, Latin America Wildlife Crime Hub, and Asia-Pacific Illegal Wildlife Trade Hub) to strengthen the capacity of on-the-ground teams. Through the hubs we are creating awareness of human rights issues and strengthening the capacity for implementation of WWF policies and standards. WWF-US has further designated a lead law enforcement position and WWF International is in the process of finalizing a similar position, which we anticipate will be filled by June 2022. These roles are designed to help ensure the outcomes of enforcement—whether conducted by communities or government—are successful and done in a way that respects human rights.

- **Promoted the use of the Spatial Monitoring and Reporting Tool (SMART).** SMART, which is now operational in 1,000 sites across 60 countries, was designed to help monitor ranger activities on the ground. Through data collection, analysis, and assessment, SMART provides anti-poaching, law enforcement, and management efforts with the information required to make informed and decisive action—not only for management and enforcement purposes but also for accountability. In 2020, WWF conducted an assessment of 49 SMART sites spanning 14 countries in Africa and Asia to identify the challenges in implementation. Management oversight by the government conservation authorities and lack of capacity were identified as key challenges. To address this, a global [SMART Competences](#) register was developed and released in July 2021 with the goal of defining and classifying the competences needed to use SMART effectively in adaptive management of conservation sites. It helps SMART trainers and users identify competence needs, define capacity building curricula, and include SMART-related tasks in the job descriptions of staff from SMART teams. Additional tools and guidance will be provided by the SMART Partnership in the future.
- **Promoted citizen science techniques to promote community participation and governance.** WWF supports efforts to assist communities in actively monitoring natural resources and changes in their environment based on criteria important to them. This is an innovative and rapidly developing field. A “citizen science” version of SMART, called SMART Collect, was developed to support community reporting and launched in October 2021. Additionally, WWF is currently exploring an opportunity to partner with University College London to bring the ExCiteS (Extreme Citizen Science) programme to landscapes, starting with Salonga in the DRC. ExCiteS provides technology and training to help

community members actively monitor natural resources, with community conservation volunteers playing key roles in supporting and leading community initiatives and acting within a network to disseminate information horizontally and vertically. Community monitoring in Salonga is expected to help reduce both poaching and misconduct from rangers over time.

As an example of how the process works, we describe here a case study from Malaysia:

WWF-Malaysia's 2015-2018 survey showed that there had been a 50% decline in tiger density in the Belum Temengor tiger landscape since the baseline study was conducted in 2009-2011. The baseline study originally showed that Royal Belum State Park had the highest density of tigers in the entire country at the time with plentiful tiger prey, especially sambar deer. The alarming decline that followed can be attributed to the influx of foreign poachers setting large numbers of snares for wildlife species and targeting high-value forest produce such as agarwood. To address this, WWF-Malaysia established Project Stampede in which 15 teams, comprising 75 Orang Asli Indigenous People, patrol Belum Temengor. Although these rangers do not have enforcement powers, they act as the eyes and ears for the enforcement authorities and report poaching incidents to aid enforcement operations. These teams frustrate poachers by continuously dismantling snares and deterring them with their presence. In addition, this provides Indigenous communities with an alternative livelihood. Since Project Stampede was established, snare encounter rates have declined by more than 90% compared to FY17's baselines. In 2019 and 2020, the Project Stampede team covered more than 22,000km on foot, making this the most intensively patrolled landscape in Malaysia.

Third-Party Assurance

Governments are responsible for protecting human rights. WWF and other civil society organizations must respect human rights and play a critical role in advocating and leveraging our agency to support governments in fulfilling their obligations. We committed in our Management Response to better use our agency to influence realities on the ground. Several steps have been taken in this regard, although this is a complex area (see [Challenges](#) below). Examples of where we have strengthened advocacy with governments to more proactively address human rights include:

- **DRC:** In Salonga National Park, WWF predicated negotiations relating to renewing the partnership on a demonstrated commitment by the government to strengthen human rights protections. The final agreement, signed in October 2021, reflects commitments by both parties to advance more inclusive and sustainable conservation. In negotiating the agreement, we were closely guided by the commitments made as part of WWF's Management Response to the Panel's report. The agreement prioritizes community development, respect of rights, and professionalized law enforcement, bringing in specialized partners to embed rights-based approaches in conservation work and the government's anti-poaching efforts. All activities under the partnership will be undertaken in compliance with WWF's social policies and E&S safeguards framework to help avoid or mitigate any unintended negative impacts.
- **Nepal:** In response to media reports in July 2020 of incidents involving alleged abuses of Chepang Indigenous People by government personnel in the Chitwan National Park area, WWF-Nepal immediately urged senior government officials to investigate and reached out to the National Human Rights Commission of Nepal to explore ways of providing expanded human rights guidance to national park staff. WWF-Nepal also placed a hold on funding for conservation law enforcement support activities across Chitwan National Park pending evidence of substantial progress in the government investigation. We took these steps even though the alleged incidents took place in areas of the park where WWF does not work. Since then, the Department of National Parks and Wildlife Conservation and the Nepali Army have transferred implicated personnel or suspended them from duty while investigations take place.

The following progress was made in more systematically exercising our influence with government partners responsible for human rights protections in places where WWF operates:

- **Sharing Human Rights Statements with government partners.** An affirmative statement on WWF's commitments to human rights was circulated to key government partners in Cameroon, Central African Republic, Democratic Republic of the Congo, Republic of Congo, India, and Nepal. By June 2022, we will have shared this affirmative statement in all countries where we partner with governments on conservation field work that includes work with Indigenous Peoples or technical support for rangers engaged in conservation law enforcement, or where field work proposed by governments and supported by WWF may lead to new resource access restrictions for communities.
- **Defining contractual clauses on human rights.** In consultation with human rights experts and legal counsel, WWF is developing draft human rights provisions for new agreements with governments and other partners in area-based programmes. These provisions will reinforce our ability to withhold project funding where human rights protections need to be further strengthened. They will be finalized no later than March 2022.
- **Embedding our human rights commitments in new agreements** with governments and other partners in area-based programmes when contracts are renewed or new partnerships form.

CHALLENGES

The Independent Panel report provided valuable foundational advice on how to strengthen human rights in conservation in fragile and conflict-affected places. This advice is not only pertinent to the entire conservation community but also reflects the interlinkages between conservation, development, and governance. In our Management Response, we laid out the measures WWF would take to address the Panel's recommendations. While we have made progress as detailed in the preceding pages, we recognize that our ambition is high. Further, we have been confronted with challenges, some unique to WWF given our federated structure and others common to the conservation sector more broadly. We are committed to continue doing our utmost to address these and realistically report on efforts, progress, and setbacks. Some of the greatest challenges we face include:

- **Risks of speaking out.** Sometimes it is hard to speak out in a particular country. Indeed, we experienced instances in the past year where WWF staff were threatened as a result of speaking out. Environmental defenders around the world are at risk. Research published in 2020 found that in one-fifth of environmental conflicts around the world, activists face criminal charges or are imprisoned as a result of their work defending natural resources: in 18% of those cases, activists were victims of physical violence; in 13%, they were murdered¹⁰. As we advocate for the safety of communities, we also have a responsibility to ensure the safety of our staff. In some circumstances, it may be safer and more effective for all parties to take action behind the scenes rather than taking a public stance. Groups not based in country can better afford to speak publicly. We need the human rights and conservation communities to come together to find solutions. In fact, our power is amplified by working together. When similar-minded organizations collaborate, we all benefit from strength in numbers and the risks associated with standing up for peoples' rights are diminished.
- **Persevering through conflicts.** There are unique challenges to operating in countries with weak governance, in conflict or post-conflict states, and in remote areas of fragile and conflict-affected countries. In these places, there is a greater need for funding to implement rights-based approaches, safeguards, and measures to strengthen the protection of human rights by governments, which requires collaboration with donor countries and institutions. In some circumstances, WWF has to

¹⁰ Arnim Scheidel, Daniela Del Bene, Juan Liu, Grettel Navas, Sara Mingorría, Federico Demaria, Sofía Avila, Brototi Roy, Irmak Ertör, Leah Temper, Joan Martínez-Alier, Environmental conflicts and defenders: A global overview, Global Environmental Change, Volume 63, 2020, 102104, ISSN 0959-3780, <https://doi.org/10.1016/j.gloenvcha.2020.102104>.

measure the costs, benefits, and risks of withdrawing from such a country or place, taking into account the fact that in some cases withdrawal may actually lead to worse conditions for communities both in the context of support for their livelihoods but also in terms of respect for human rights. In Dzanga-Sangha, Central African Republic (CAR), where we have worked for decades, WWF chose to stay during times of conflict, notwithstanding the major challenges of operating in those conditions. More recently, there has been relative peace and stability in the CAR, and the communities have benefitted from our commitment. These are challenging decisions to make.

- **Operating in places with weak access to justice.** Governments must provide access to justice. Access to justice includes the ability to obtain representation and bring matters to the courts, and it is essential both to support victims in asserting their rights as well as to hold offenders accountable. However, conservation work often takes place in remote areas within fragile states, where the rule of law and access to justice is weak. While states are responsible for their justice systems, WWF and other conservation organizations can play an important supporting role when alleged criminal acts occur in project areas. Conservation groups like ours can act to amplify the voices of those harmed and press governments to provide access to justice. We have established clear steps for staff to take should they become aware of criminal allegations in places with weak access to justice. When we work with a government that is failing to meet its obligations related to access to justice and other human rights, we have a series of escalating steps including suspension of funding and, ultimately, withdrawal from the project or country if the government does not act.
- **Proportionality in applying safeguards.** While we've made significant progress in addressing safeguards, it has been asymmetric across countries and in the land- and seascapes where we operate. We signalled in our Management Response that the measures we would take would follow the principle of proportionality; that is, we prioritize mitigation measures for risk where risks are assessed as higher. Although we have taken this approach, we have also remained committed to screening all our field work no matter the location, including in countries where human rights protections are strong (i.e., where there is strong governance, rule of law, and access to justice) and where risks are low. Going forward, we need to consider the relative weight afforded to risk screening in such places. There are trade-offs in terms of staff time and resources that must be factored into the equation.
- **Scale of effort.** A related point is that we are committed to applying safeguards in ongoing programmes and not only to new initiatives. We agreed to primarily address safeguards at a landscape level, which provides the locus for most WWF interventions. There are over 300 land- and seascapes that need to be screened using a comprehensive tool developed for the purpose. We have adopted an online project management platform, which helps support this process by allowing every WWF office as well as a steering committee, management team, and workstream leaders to assess implementation progress in real-time (see Annex 1). However, the scale of the task remains challenging given that this is the first time in the conservation sector that an institution has taken such a comprehensive approach to applying safeguards. Relatedly, our focus is on building safeguards and human rights into the culture of our conservation work. We have therefore sought to build internal capacity through staff training, learning by doing, and the induction of new staff with extensive skills and expertise in the arenas of safeguards and human rights—instead of hiring external consultants who would more quickly conduct screens but leave without advancing internal expertise. Because this is such a major undertaking, a large focus of activities over the past year has been on building capacity, which is critical to the long-term effectiveness and sustainability of our measures. We underestimated the work and time required to build this foundation—a key lesson learned that we are sharing with our conservation agency peers.
- **COVID-19 and field consultations.** We have instituted changes to assure that the voices of communities are better heard in the places we work and to improve our ability to meet our commitments. However, these rely on effective and full consultations, which have been difficult to

undertake due to COVID-19-related restrictions on operations and in-person exchanges with communities. We have tried to address these by focusing on the overall architecture through our public consultation on draft social policies and safeguards and the establishment of the office of the Ombudsperson. We recognize that progress must be steadier in the next two years, circumstances permitting.

The pandemic and related restrictions have created issues in the field that hampered much of our work with communities due to difficulties of outreach and health risks associated with this. Health and safety issues should not be underestimated. Dynamic infection rates, periodic lockdowns, and wide-ranging government actions have materially compromised our ability to deliver work as planned, including engaging with communities directly, and continues to do so. The pandemic has impacted our training, field-level consultations, and other in-person measures identified in the Management Response. In some countries, it will be quite some time before communities have access to vaccines, and we have the opportunity to have open, in-person conversations in local languages. Our consultations remain ongoing, as we continue to seek feedback and adapt accordingly.

- **Free Prior and Informed Consent (FPIC).** One of the issues arising from our ongoing consultations with human rights and development groups—as well as others in the conservation sector—were the challenges associated with obtaining FPIC for conservation measures that may result in access restrictions. We recognize that obtaining FPIC is critical to ensuring a people-centred approach, but while many governments claim to recognize the right of FPIC, many have not put in place measures for realizing free, prior, and informed consent. In some instances, those countries lack procedures or processes to implement FPIC processes, while others do not recognize groups as Indigenous Peoples (consistent with ILO 169 and UNDRIP). It is made even harder to orchestrate these processes where there is weak governance in the community or where leadership is not truly representative. FPIC is also difficult because Indigenous communities are often decentralized, opinions may be broad, and there may not be a single entity that can speak for the entire community. This is an area in which the conservation community must partner with human rights groups and development organizations in order to operationalize rights-based approaches. This will be particularly important in countries where governments are not supportive of the rights agenda and where there is a need to advocate for rights. There is also a burning need to build capacity and engage governments in establishing policies and procedures to ensure consistency in approaches.

CONCLUSION

The challenges that we confront today are enormous and complicated, and they require multidimensional, intersectoral, systems-based approaches. Because nature and development are intrinsically linked, all stakeholders must come together to determine the trade-offs and chart a path forward—both in individual places and on global stages. We need to put the conservation agenda in the context of what is needed to achieve sustainable development and ensure there is equity in the benefits accruing from our work. How do we ensure a prosperous economy and jobs for the future? How do we ensure that the world has more equity, socially, between different groups, some of whom have been in conflict for decades or longer? And how do we decouple economic development and the quest for social equality from environmental destruction? We must find answers for these questions in the places that we work, and this is going to require coming together like never before. Local governments, local communities, civil society, businesses, and others will need to find solutions that work in a rapidly changing world and result in positive, enduring change.

If we are to achieve our mission to build a future in which people live in harmony with nature, then the conservation and wise use of nature and respect for human rights must become universal norms, regardless of who holds responsibility for those areas. They must also be mainstreamed into our societies and economies through the policies we implement and the actions we undertake that indirectly affect nature.

Inclusive conservation demands the recognition of the full range of custodians of nature—state and non-state, private and public, individual and collective, from governments to Indigenous Peoples and local communities to private landowners. We need to embrace a diversity of perspectives and approaches and afford everyone the opportunity to participate and contribute meaningfully. To do so, we must recognize that this opportunity is currently not available to all, due to power asymmetries and injustices that erode the rights of individuals and groups (including rights over land and resources) and otherwise reinforce inequalities and barriers to participation. For conservation to succeed, these issues need to be tackled.

This Year 1 Implementation Update highlights important steps we have taken to lay the foundations and ensure we have capacity to sustainably deliver on our Management Response, as well as some of the lessons we've learned and challenges we face already. We know this is only the beginning of a long process towards achieving the transformation we seek, and we still have steps to take. In particular, we soon anticipate:

- publishing our updated Human Rights statement, social policies, and E&S safeguards framework, which will reflect the constructive consultation feedback and include a summary of the consultation process and outcomes;
- launching a landscape disclosure portal concurrent with the public release of the revised social policies and safeguards, which will include the outcomes of risk screenings and mitigation frameworks;
- ensuring our highest governance bodies authentically engage with and onboard the perspectives, experience, and knowledge of Indigenous Peoples to deliver meaningful engagement and recognition of rights and delivery of practical outcomes in critical landscapes (e.g. on access rights);
- finalizing E&S safeguards mitigation plans for our highest risk landscapes, informed by third-party experts;
- clarifying standard operating procedures for our Ombudsperson function;
- implementing our assurance mechanisms to ensure all offices are complying with WWF's values and core standards;
- providing further training and support for all staff on identifying and managing risks, and ensuring swift action and escalation of issues and complaints.

The Management Response is a top priority for WWF globally. Driving implementation and monitoring internal progress on a regular basis will remain a key focus for the WWF International Board and Network Executive Team. We will continue to publish updates on important developments in 2022 and beyond.

In undertaking these transformative efforts, WWF will not be operating alone. We will be listening to and working with communities, partners, donors, peers, and experts to implement the changes needed. We will continue leveraging our influence to help ensure that human rights are respected throughout our field work and that we deliver on our mission for people and nature to thrive.

ANNEX 1: Action Implementation Oversight Framework

WWF's Management Response encompasses the full spectrum of the Independent Panel's recommendations. Implementation arrangements have been established to accommodate WWF's federated structure and unique needs.

WWF operates in over 100 countries as a federated network in which every office is bound together by a common mission, brand, conservation strategy, and set of values, standards, policies, and safeguards. This combination of local and global presence confers both advantages and challenges, and it requires specific arrangements to ensure network-wide compliance with our stated commitments and ensure uniformity in our approach to respecting human rights, recognizing that this is easier in some places than others.

To implement the commitments made in the Management Response, we developed a three-year Action Plan laying out the suite of actions the WWF network agreed to take and assigned roles, responsibilities, and deadlines for implementation. A steering group, accountable to our highest governance bodies, has been established to oversee implementation, track progress, and take action to address bottlenecks.

Clear leadership and reporting structures have been established to ensure accountability through to the Network Executive Team (NET), the highest executive body within the network, and the International Board. To assist with implementation, NET appointed an Action Plan steering group, which is chaired by the CEO of WWF-Netherlands and comprised of senior members from across the network knowledgeable in both network operations and conservation. The group is tasked with the overarching responsibility of ensuring that the commitments described in the Management Response are realized over a period of three years and reporting regularly on progress to the NET and International Board. The steering group is supported by a project management team and meets on a biweekly basis.

Seven workstreams have been established by the steering group to guide implementation across the network. Each workstream is led by one or more of WWF's senior leaders. The workstreams are as follows:

Workstream	Purpose
Safeguards, social policies, and human rights	Clarify standards and support implementation of safeguards, social policies, and human rights in landscapes and projects
Risk and quality assurance	Ensure capacity and systems are in place to review WWF proposals and projects so as to deliver conservation objectives while managing risks, and implement Risk and QA Standard and procedures across offices
Third-party assurance	Finalize third-party agreements and due diligence procedures to support global compliance with safeguards, social policies, and human rights
On-the-ground capacity and mechanisms	Ensure measures are taken to strengthen local WWF office capacity to assure Environmental & Social (E&S) safeguards compliance in high-risk areas
Governance and management oversight	Define required governance and management oversight mechanisms to enable long-term integrity of Action Plan outcomes
Communications and donor engagement	Establish regular, comprehensive, and authentic communications strategy/reports for donors, partners, and internal stakeholders pertaining to progress on WWF's Action Plan
Future of conservation	Guide WWF's longer-term approach to conservation so that efforts are sustainable, inclusive, and enable E&S safeguards principles

The actions spelled out in the Management Response and captured in the Action Plan are being tracked through a virtual project management platform. There are a total of over 160 actions at the global level, including approximately 100 actions to be taken across the landscapes reviewed by the Panel. Twenty-seven actions must be undertaken by every individual office across the network. The management platform allows the steering group, management team, and workstream leaders to assess implementation progress for every WWF office in real-time. The steering committee regularly updates the NET and International Board on progress, and they also have access to the platform, thus ensuring transparency and accountability.