

Judge Navi Pillay
Chair
Independent Review Panel on WWF

3rd September 2019

Dear Judge Pillay,

We are writing to express our great concern at the way in which the Independent Review of WWF appears to be proceeding.

First, we are concerned that there are significant barriers to victims of human rights abuses and civil society organisations in the countries concerned being able to submit evidence to the review. We only learnt about the call for submissions from a tweet by John Knox on the 24 August. It is deeply regrettable that key actors, who have been speaking out against human rights abuses funded by WWF, were not properly and proactively informed of the call for submissions. Of the 31 organizations working with tribal peoples that wrote to Mr. Lambertini raising concerns about this Review between April and May 2019, several of them have confirmed that they weren't aware of this call.

If international organisations that have access to the internet and read English are not aware of it this call then there is little chance that those who speak other languages or have little or no access to the internet will be, let alone being able to send a submission by email. It is vital for a credible process that the call for submissions is properly, systematically and proactively communicated to all the actors involved. Proper mechanisms need to be put in place to allow local organizations and communities to present their evidence in ways and at locations that are appropriate to them.

Second, the proposed timeframe to send a submission is one and a half months from the time WWF apparently 'announced' the call on its website, two weeks of which have already passed. We are very surprised that there has apparently been no appreciation of the need for outreach, including to remote rural communities, translation of documents, consultation with local communities and indigenous groups before such submissions could be made and the time that such processes require. For organisations with substantial amounts of evidence to present, the shortness of the deadline places a heavy burden on resources and capacity.

Third, it is very worrying that the only allegations that this panel will consider are those made against WWF by the series of articles written by BuzzFeed. We have been submitting evidence of human rights abuses funded by WWF for years and many tribal communities have also been speaking out against the crimes committed in the name of conservation for years. It is horrific, from a human rights perspective, that their abuses, their pain and their losses will be ignored. It is clear that the problems are systematic and so, as we noted in our

letter to WWF in April 2019, the Review should not be limited in this arbitrary way. In refusing to accept submissions of abuses not covered by Buzzfeed, we believe that the Panel risks failing to address the wider, underlying and systemic problems in WWF and its approach to conservation. This gives the impression that the Review is ultimately more of a PR response than a thorough and comprehensive examination of past failings and mismanagement on the part of WWF. It will very likely leave some conflicts and problem areas festering indefinitely.

Finally, while the Panel's 'Objectives' have been revised and somewhat embellished in July, we note that essentially none of the other points we made in previous correspondence have been acted on and we find that important information about the modus operandi of the Panel is lacking. For example, what level of confidentiality (or transparency) is operating, between the Panel and WWF? Can confidential submissions be made, and what steps is the Panel taking to ensure that any information implicating specific WWF individuals does not result in further repercussions for victims or accusers? Is the Panel going to conduct any actual field investigations or meet with any organisations submitting evidence?

We therefore urge you to extend the deadline, insist that the call for submissions is very proactively publicised by WWF, open the inquiry out to any cases where WWF has allegedly been involved in abuses, allow for varied forms of evidence in appropriate locations, and publicly clarify exactly how the Panel intends to do its work,

Sincerely,

A handwritten signature in black ink, appearing to read 'Simon Counsell', written in a cursive style.

Simon Counsell
Executive Director, Rainforest Foundation UK

A handwritten signature in black ink, appearing to read 'Stephen Corry', written in a cursive style.

Stephen Corry
Executive Director, Survival International