



WWF ENVIRONMENTAL AND SOCIAL SAFEGUARDS FRAMEWORK

Overview Document

WWF's Environmental and Social Safeguards Framework (ESSF), hereafter referred to as the “framework,” provides an institutional mechanism to manage the environmental and social risks of WWF's work, helps deliver better conservation outcomes, and enhances the social well-being of local communities in the places where WWF operates. The safeguards framework is designed to address a broad range of environmental and social risks, mindful of the different challenges and needs in different parts of the world. It systematizes good governance practices to achieve human rights, transparency, nondiscrimination, public participation, and accountability, among other goals.

This document outlines WWF's safeguards framework and its policies, standards, risk screening tools and planning documents, as well as the institutional arrangements that make implementation possible.

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TABLE OF CONTENTS

Part I: Background—4

WWF's Existing Social Policy Framework

Part II: Environmental and Social Safeguards Framework—6

Comprehensive Environmental and Social Safeguards Framework

Maintaining the Highest Standards

Safeguards and WWF's Project and Program Cycle

Part III: Institutional Arrangements—9

WWF International Safeguards Unit

WWF Office Responsibility and Accountability

Office of the Ombudsperson -

Independent Monitoring and Review Function

Part IV: Standards—12

The Environmental and Social Management Standards
of WWF's Safeguard Framework

Excluded Activities

Part V: Getting Started—15

Safeguards Screening Tool

Risk Categorization

Sign-Off of Screening and Categorization

Part VI: Mitigation and Implementation—20

Mitigation Planning

Stakeholder Consultation

Finalizing Mitigation Plans

Sign-Off of Mitigation Plans

Financing

Implementation

Monitoring and Reporting

Part VII: Responding to Grievances—24

WWF Policy on Accountability and Grievance
Mechanism

Country- and Project-Level Grievance Redress
Mechanisms

Part VIII: Ombudsperson's Office - Independent Monitoring and Review Function—26

Independent Monitoring and Review Function
Response Protocol on Human Rights

Part IX: Documentation and Disclosure—28

Documentation

Disclosure

Conclusion—29

Part I: Background

WWF's Existing Social Policy Framework

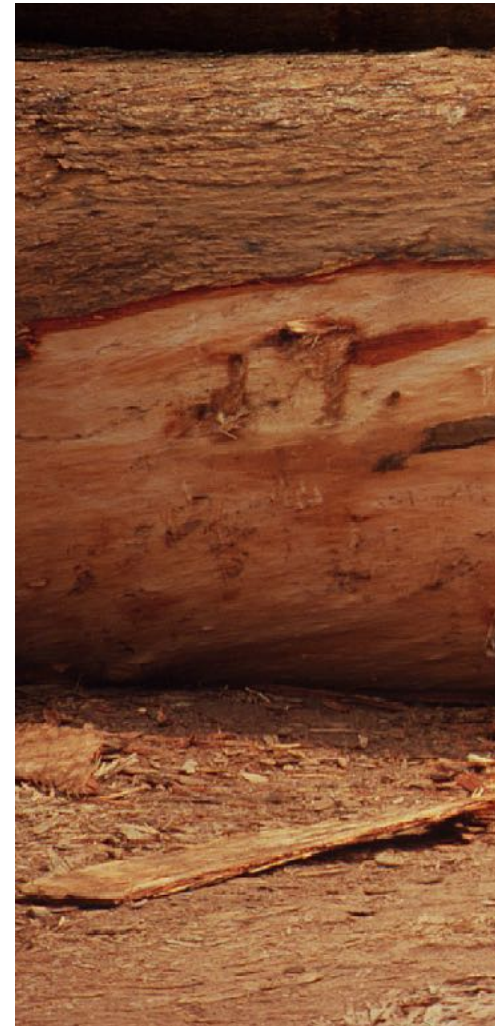
WWF is a founding member and one of the first signatories of the 2009 Conservation Initiative on Human Rights, committing itself to respecting internationally recognized human rights and ensuring that WWF projects do not result in human rights violations. Through this mechanism, WWF commits to these principles:

Respect Human Rights. Respect internationally proclaimed human rights and make sure that we do not contribute to infringements of human rights while pursuing our mission.

Promote Human Rights Within Conservation Programs. Support and promote the protection and realization of human rights within the scope of our conservation projects.

Protect the Vulnerable. Make special efforts to avoid harm to those who are vulnerable to infringements of their rights, and to support the protection and fulfillment of their rights within the scope of our conservation projects.

Encourage Good Governance. Support the improvement of governance systems that can secure the rights of indigenous peoples and local communities in the context of our work on conservation and sustainable natural resource use, including elements such as legal, policy, and institutional frameworks, and procedures for equitable participation and accountability.





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Complementing this commitment to human rights, WWF has further adopted the following social policies.

The WWF Statement of Principles on Indigenous Peoples and Conservation (1996 and updated in 2008). These principles ensure that the rights of indigenous peoples are respected in WWF's work, that indigenous peoples do not suffer adverse impacts from WWF projects, and that they receive culturally appropriate benefits from conservation. WWF must ensure the following:

- Projects respect indigenous peoples' rights, including to free, prior, and informed consent and to tenure over traditional territories.
- Culturally appropriate and equitable benefits (including from traditional ecological knowledge) are negotiated and agreed upon with the indigenous peoples' communities in question.
- Potential adverse impacts are avoided or adequately addressed through a participatory and consultative approach.

The WWF Policy on Poverty and Conservation (2009) reaffirms WWF's commitment to embrace a pro-poor approach to conservation, strive to find equitable solutions for people and the environment, and make special efforts to enable local people to play a key part in crafting solutions for sustainable development.

The WWF Gender Policy (2011) signifies WWF's ongoing commitment to equity and integrating a gender perspective in its policies, programs, and projects, as well as in its own institutional structure.

PART II: Environmental and Social Safeguards Framework

Comprehensive Environmental and Social Safeguards Framework

The board of WWF International and the WWF Network Executive Team (NET) agreed to adopt the safeguards framework in June 2019 and to ensure consistent, comprehensive application of safeguards across the entire WWF Network¹. The framework will be reviewed and updated periodically in consultation with stakeholders across the WWF Network and with outside practitioners and civil society organizations (CSOs).

Safeguards were designed as a risk mitigation management system to be applied to development projects that may potentially generate negative social or environmental impacts. They have been progressively adopted by bilateral development agencies (e.g. KFW - the German development bank, and United States Millennium Challenge Corporation (MCC), international development organizations (e.g. World Bank, InterAmerican Development Bank, and other multilateral banks), United Nations development agencies, and environmental funds (e.g. Global Environment Facility). They are also being adopted by conservation-focused nongovernmental organizations (NGOs), including the International Union for Conservation of Nature (IUCN).

What are safeguards? A set of standards, policies, planning and implementation mechanisms, and compliance systems that govern how activities are carried out to safeguard people from harm.

Why are safeguards necessary? To help ensure that conservation efforts do not have adverse social and environmental impacts, and most important, to help ensure the protection of human rights.

Where are safeguards implemented? Anyplace WWF investments inform or make possible on-the-ground conservation and there is a consequent social or environmental risk to be managed.

When are they implemented? When environmental or social risks have been identified in a project, and when that project is being carried out with financial resources that flow directly through WWF accounts.

Who is responsible? Everyone at WWF has a role to play in implementing safeguards, to varying degrees.

¹ WWF's highest executive body chaired by the Director General of WWF International and comprising CEOs of a representative sample of WWF offices

WWF's safeguards framework has been designed to meet the specific needs of WWF, which is a global network of independent NGOs that operate under a common licensing agreement and brand, and that pool funds to advance common conservation objectives.

The seven core elements that underpin WWF's ESSF

- 

Element 1: One Set of Standards
Ensures consistent application and cohesion across a global network
- 

Element 2: Clear Responsibility and Accountability
Identifies who does what, and who is ultimately answerable for successful implementation
- 

Element 3: Proportionality and Informed Risk
Matches response to the level of risk in the different countries where WWF works, requiring additional measures in high risk contexts
- 

Element 4: A Centralized Unit and Training
Serves as the guardian of the standard, help desk for implementation, and central hub for relevant internal and external needs
- 

Element 5: Effective Project Development and Quality Assurance
Embeds monitoring and critical checkpoints throughout the project development cycle
- 

Element 6: Independent Monitoring and Review
Third-party unit, headed by an ombudsperson, ensures impartiality and credibility when responding to complaints
- 

Element 7: Scaling to Maximize Efficiency and Effectiveness of Results
Applied at the landscape/seascape level to large programs that typically encompass a suite of smaller projects

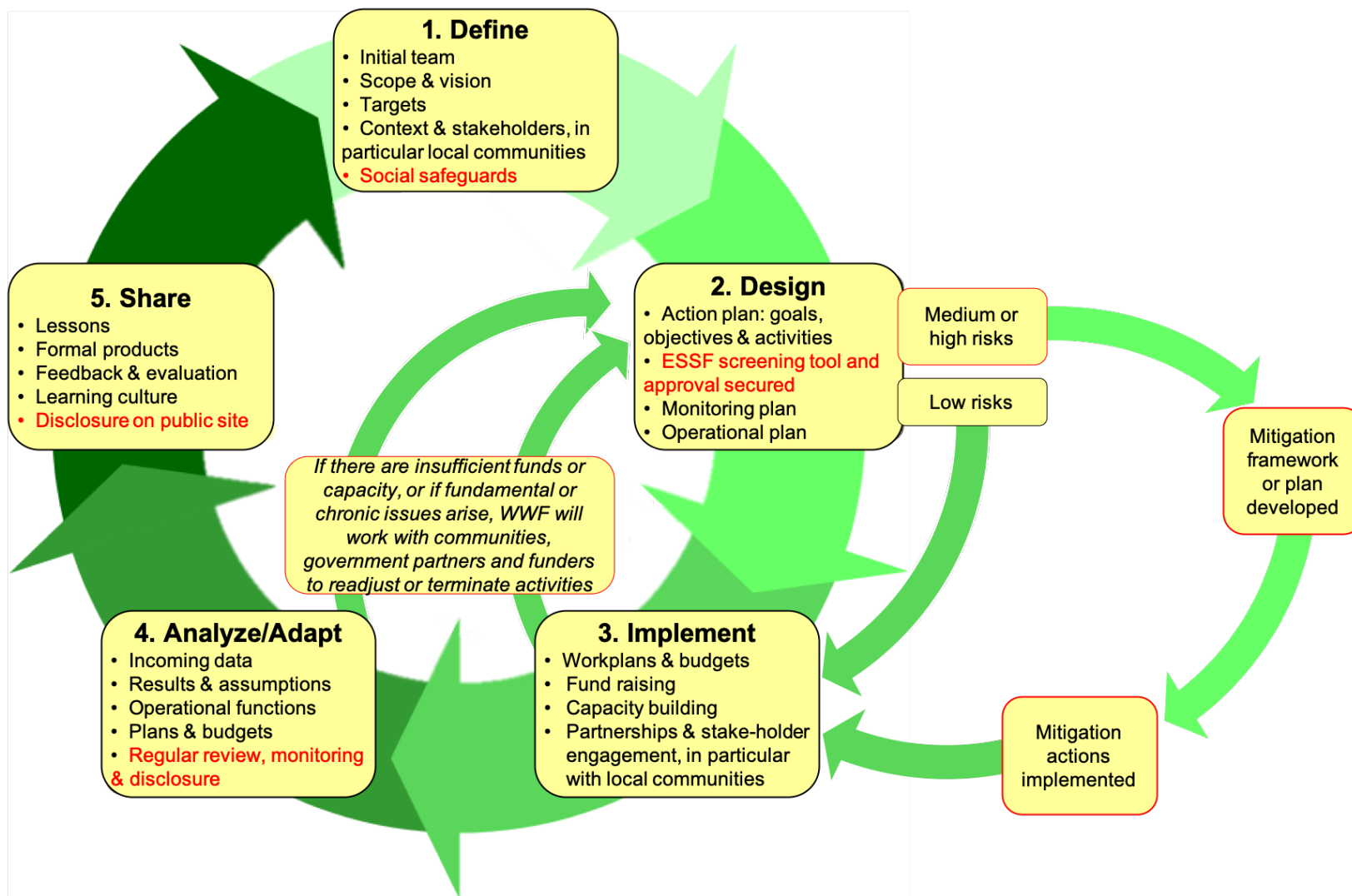
WWF often pursues long-term, rolling projects that comprise a set of actions to pursue sustainable development and secure nature in landscapes and seascapes. The safeguards framework will be applied to the entire set of actions and interventions undertaken in these landscapes and seascapes, rather than considering each project separately. As such, in this document, “project” is used to capture the entire set of activities where resources are provided in the form of technical assistance, physical investments (infrastructure, technology, or equipment), or financing to bring about changes in skills, knowledge, attitudes, behaviors, and/or practices of institutions or individuals within a defined geographical area.

Maintaining the Highest Standards

The purpose of the framework is to set a minimum “floor” globally for WWF’s work and ensure that at least these standards are met. We will follow the highest social safeguards expected by government funding agencies and other donors (e.g., USAID has specific policies and requirements around trafficking in persons and working with children), as well as national laws and safeguards standards where funding originates or is ultimately invested.

Safeguards and WWF Project and Program Cycle

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



PART III: Institutional Arrangements

The institutional arrangement to implement the framework is summarized below.

1

WWF International Safeguards Unit staffed by a dedicated team that provides the foundational support and cohesion for the implementation of safeguards across the network. This includes managing the screening tools, overseeing training and accreditation, managing the internal and external safeguard databases, and ensuring quality assurance.

2

WWF Offices in countries where activities take place are responsible for applying safeguards as per the safeguards framework. WWF offices may recruit safeguard experts to provide guidance and quality assurance, and to ensure consistency across the network. These experts will need to be accredited through the International Safeguards Unit to perform this function.

3

Independent Monitoring & Review Function led by an ombudsperson that includes dispute resolution, compliance assessment and advisory functions.



WWF International Safeguards Unit

The WWF International Safeguards unit maintains and oversees the safeguards framework. It will be headed by a lead safeguards specialist and employ regional specialists, who will work together to perform the following functions:

Safeguards Framework Management. The unit serves as the repository of safeguard standards and policies. The team maintains and strengthens risk-screening tools, and updates the safeguards framework as needed to align with international best practices.

Help Desk and Training. The team will provide guidance as they screen projects for risk and develop mitigation plans. They will also be responsible for overseeing the rollout of training for all WWF staff.

Quality Assurance. The safeguards specialists (or staff that they accredit) will review and sign off on all risk-screening results and mitigation plans.

Accreditation. WWF's safeguards framework depends on safeguards experts to provide quality assurance across the WWF portfolio globally, ensuring that environmental and social issues are adequately addressed within the project life cycle, and to provide relevant safeguards approvals. While the unit will employ safeguards experts, the system is designed to be supported by a network of technical experts who are able to provide help and quality assurance, and any WWF office may employ someone to perform these functions. To ensure consistency and ensure the highest standard of safeguards are applied systematically across the WWF Network, staff serving these functions need to be accredited by the WWF International Safeguards Unit. It will be the responsibility of the head of the unit to develop and maintain the accreditation system for such staff, and to report to the WWF NET, or more frequently as needed, on the accreditation program and any measures needed to strengthen its performance.

Database. The Safeguards Unit also maintains the database where all risk screenings, mitigation plans, reports, and reviews are stored, and provides public disclosure of safeguards actions. The unit will report to the WWF NET on the comprehensiveness of the database, pertinent updates, and missing information.





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WWF Office Responsibility and Accountability

WWF offices where project implementation takes place are responsible for applying safeguards in the landscapes and seascapes where WWF investments are made.

The CEO or equivalent of each legal WWF entity, along with their Board, is fully accountable for country programs and initiatives under their legal jurisdiction and must ensure their overall portfolio is managed in accordance with the safeguards framework. The CEO may delegate responsibilities for different safeguards functions while maintaining overall accountability.

The landscape lead is a named individual who has ultimate responsibility for the project activities in a landscape or seascape. Within the safeguards framework, the landscape lead is responsible for ensuring safeguards procedures (including screening, development of mitigation plans/actions, establishing relevant grievance mechanisms, etc.) are undertaken for all project activities.

WWF offices will be required to set up grievance mechanisms for stakeholders to lodge concerns regarding implementation of WWF's safeguards policies and securing satisfactory resolution. Further information on grievance mechanisms can be found in Part VII of this document.

Office of the Ombudsperson - Independent Monitoring and Review Function

A separate office will be established to implement the independent monitoring and review function. Headed by an ombudsperson, it will ensure neutrality in dispute resolution and compliance. The responsibilities of this office are described in more detail in Part VIII of this document.



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Part IV: Standards

The Environmental and Social Management Standards of WWF's Safeguards Framework

WWF's global network of offices will use a common set of standards to identify and manage the environmental and social risks where WWF field-based projects could have adverse impacts as well as opportunities for improving social and environmental outcomes. The safeguards framework has 10 standards that fall into three broad categories.

Category One. Standards applied in all mitigation planning.

Environmental and Social Risk Management. This standard describes WWF's process for identifying potential environmental and social risks and benefits.

Consultation and Disclosure. This standard outlines WWF's commitments to engaging potentially affected peoples and providing transparency on our safeguards.

Stakeholder Engagement. This standard ensures that WWF is committed to meaningful, effective, and informed stakeholder engagement with potentially impacted communities in the design and implementation of projects.

Grievance Mechanisms. This standard puts forth a mechanism to allow affected peoples to bring forth concerns about how they are being impacted by WWF projects.

Category Two. Standards that apply to specific risks that typically arise in WWF projects.

Involuntary Resettlement. This standard helps WWF identify and respond to physical relocation, restriction of access, and economic displacement or other economic impacts triggered by WWF projects.

Indigenous Peoples. This standard ensures that all due consideration is taken in WWF projects that could potentially affect indigenous peoples' rights, including free, prior, and informed consent where appropriate.

Community Health and Security. This standard makes sure a review of potential consequences to communities' health and safety are addressed through the project, including consequences of engagement with rangers.

Protection of Natural Habitats. This standard ensures mitigation of any potential negative impact on natural habitats.

Category Three. Standards that are not likely to arise in typical WWF projects, but are required due to the accreditation of the safeguards framework.

Pest Management. This standard ensures review and proper use of pesticides and fertilizers in order to mitigate impacts on communities and natural habitats.

Physical and Cultural Resources. This standard ensures that physical cultural resources (PCR) are appropriately preserved and their destruction or damage is appropriately avoided. PCR include archaeological, paleontological, historical, architectural, and sacred sites such as graveyards, burial sites, and other sites of unique natural values.

WWF does not permit project fund expenditures in the following activities:

Excluded Activities

- I. weapons and munitions²
- II. military activities³
- III. harmful or exploitative forms of forced/child labor
- IV. formulated World Health Organization (WHO) classes IA and IB Products, or formulations of Class II products, unless exclusively used by those with training and proper equipment to avoid impacts on human health and the environment⁴
- V. procurement or use of pesticides and chemicals specified as persistent organic pollutants under the Stockholm Convention
- VI. conversion or degradation of critical natural habitats, especially those that are legally protected, proposed for protection, or identified as high-conservation value
- VII. introduction of, or increased competitiveness of, invasive species

² The restriction does not apply to field knives, bush knives, machetes and other essential field or safety gear provided to rangers. Equipment needed for research or translocation of wildlife is also permitted.

³ Use of rangers, eco-guards, or similar personnel is not considered a military purpose as long as such persons are subject to the authority of civil administrative bodies. Additional information can be found in the Exclusions List available to all WWF staff.

⁴ WHO Class IA denotes Extremely Hazardous Products, Class IB denotes Highly Hazardous Products, and Class II denotes Moderately Hazardous Products.

Part V: Getting Started



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Safeguards Screening Tool

WWF has developed a Safeguards Screening Tool (SST). This tool is maintained by the WWF International Safeguards Team and will be updated occasionally to reflect international best practices. It is the responsibility of the country team to screen projects at the landscape/seascope level. The tool is structured to walk landscape/seascope teams through a series of questions to help identify the likely risks associated with their proposed work. Screening questions relate to environmental impacts (e.g., energy, pollution, and climate considerations) and social impacts (e.g., human rights considerations, especially affecting local communities and indigenous peoples, as well as gender and labor impacts). The screening applies to field-based activities directly funded through WWF.

While the landscape and seascope teams will lead the screening effort for their landscapes and seascapes, interaction with technical and operational staff will be essential. In particular, the process should be done in consultation with relevant safeguards staff or other staff accredited for quality assurance to ensure that the analysis it provides considers all possible impacts and associated risks and meets WWF's standards.

Important: While the screening and mitigation actions described herein are meant to be applied at a landscape or seascope level, it is clear that new activities may from time to time be added to the same project (i.e., in the same landscape or seascope). In these cases, the landscape lead is responsible for reviewing existing screening results and mitigation plans against proposed new activities, and adapting the mitigation plan to address any new or increased risks found. In these cases, a safeguards expert should also review and sign off on these adapted plans.

Risk Categorization

As a result of the screening exercise, projects will be categorized according to their risk level.

Low-risk projects (Category C) are likely to have minimal to no social and environmental impacts. Examples of such activities include:

- convening other organizations
- developing standards
- advocacy campaigns and multi-stakeholder platform work
- policy work
- natural resource assessments and monitoring
- environmental and sustainable development analysis
- monitoring and evaluation exercises
- desk studies, workshops, meetings, scientific research, and field surveys (however, the nature of the research may require reclassification as medium risk)
- research and extension in agriculture, forestry, fisheries, natural resource management, remote sensing, and geospatial analysis
- capacity development, communications, and outreach programs, including training

These projects do not require the development of safeguards mitigation plans, but the screens must be signed off by the designated safeguards expert and lodged on the internal WWF database.

Note: *The expectation is that the office performing these above activities ensures that WWF's social policies are respected, for example by applying due diligence to new suppliers or partnerships.*



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Medium-risk projects (Category B) have potential adverse social and/or environmental impacts, and a mitigation plan in accordance with the safeguards framework will need to be developed to address these. Examples would include funds passing through WWF's books for field-based activities that support:

- creation and management of government or private protected areas
- creation and management of indigenous and community conservation areas
- community-based natural resource management
- sustainable development activities for local communities, such as investment in livelihoods, community health and education
- construction of small-scale infrastructure, such as visitor amenities, ranger outposts and community facilities
- direct expenditures on measures to reduce negative environmental impacts in the field, including from forestry, fisheries and agriculture

The above are medium-risk only if they occur in places that are not considered high-risk in the context of human rights abuses (see below).

High-risk projects can generally be grouped into two distinct classifications:

- **Category A projects** are likely to have significant and irreversible adverse social or environmental impacts at a large scale, such as the construction of major infrastructure. WWF does not generally implement Category A activities.
- **Special Consideration projects** are high risk because of the potential for human rights abuses. These include activities that are proposed in fragile or conflict- or violence-affected states, or regions of states that have a history of systemic human rights abuses.

High-risk projects have additional safeguards implementation requirements:

- use of independent experts in analysis and development of specialized mitigation plans
- additional due diligence, including annual site visitation and verification of safeguards implementation by independent experts
- approval by the WWF NET and governing boards of participating offices to proceed with project development; the WWF NET will then determine the arrangements that will apply for approval of plans and oversight of implementation

Prior to project implementation, WWF will ensure that the safeguard measures can be effectively implemented, and the project will be redesigned as necessary to assure this. If following redesign, the risks remain unacceptably high, the project may be cancelled on the recommendation of the WWF NET.

During implementation, WWF will take actions to address risk. If responses prove inadequate, or if conditions within or outside of the project make it impossible to fulfill these requirements, WWF will work with funding agencies and government partners to act and respond accordingly, maintaining the right to hold disbursements or cease activities if circumstances remain untenable.

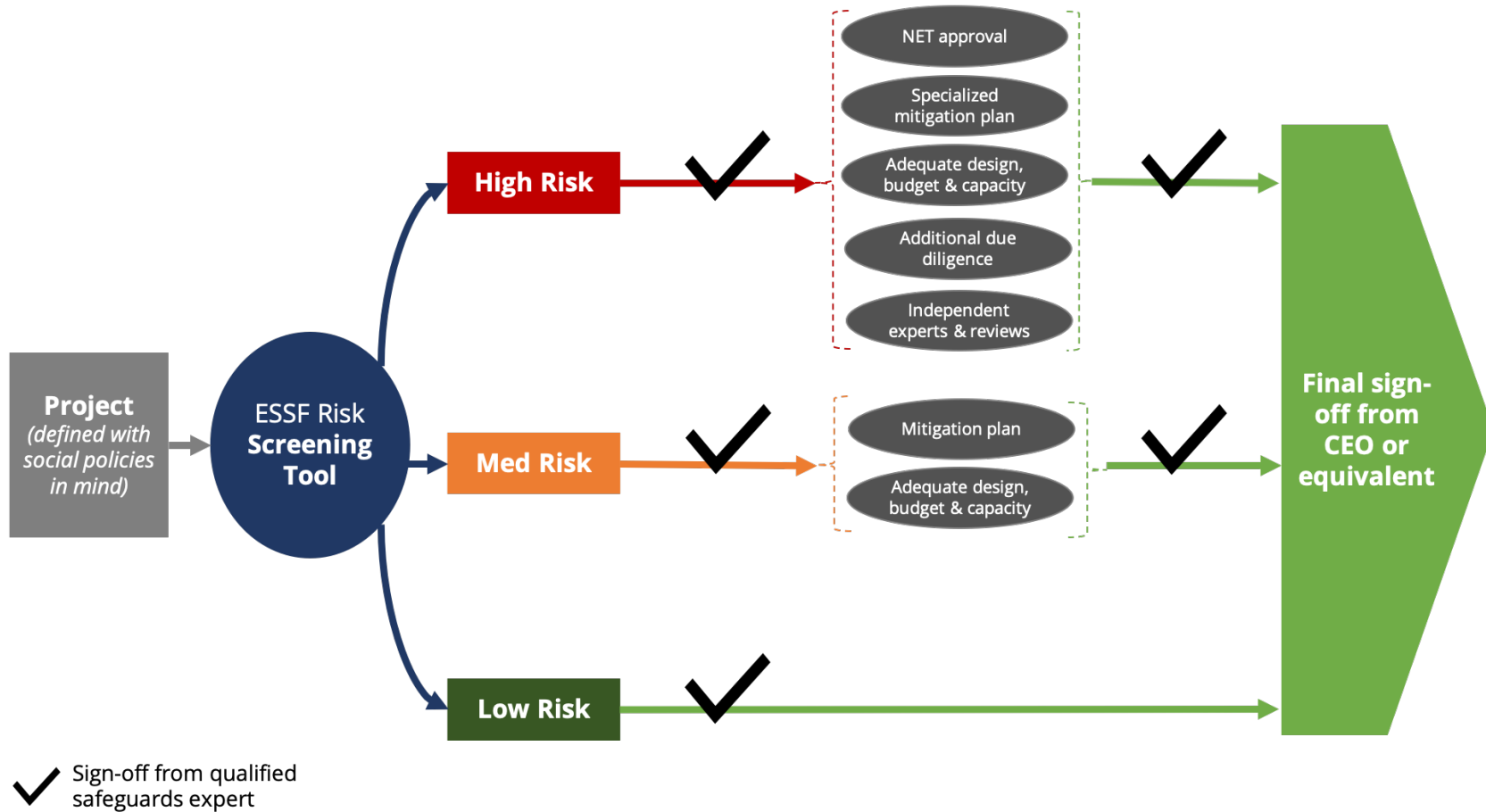
Where the project is potentially high risk, a qualified safeguards experts should become involved at the earliest stage of design. Also, further assessments or consultations may be required and mitigation plans developed, until WWF's safeguards framework requirements have been satisfactorily addressed. These assessment and subsequent mitigation activities must be budgeted and funded as part of the project.

Note: *The safeguards screening and planning requirements of specific donors, such as GEF and GCF, must be satisfied.*

Sign-Off of Screening and Categorization

The safeguards expert will analyze the results, ensure the screening is comprehensive, and take account of all likely risks before signing off.

The Screening Process



Part VI: Mitigation and Implementation



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Mitigation Planning

If the screening determines that safeguards are required, the next step is mitigation planning. This begins with a consultative process with stakeholders and, in particular, potentially affected local communities to explain the possible impacts and discuss ways the project can address these risks. The representation of the stakeholders consulted should be truly inclusive (see below). With the input from these groups, the landscape/seascape team should then be able to develop a mitigation plan.

Guidance on the risk mitigation planning system employed by WWF (e.g., Environmental and Social Management Plan, Involuntary Resettlement Plan, Indigenous Peoples Plan) is available to all staff.

Stakeholder Consultation

For all Category A or B risk-level projects, the landscape lead is required to conduct meaningful consultations with relevant stakeholders, including affected groups, indigenous peoples, CSOs, and local authorities. Consultations should include the projects' environmental and social impacts (positive and negative) and ensure the stakeholders' views are taken into account.

The landscape/seascape team initiates such consultations as early as possible. For meaningful consultations, the landscape/seascape team should provide relevant information in a timely manner and in a form and language that are understandable and accessible to diverse stakeholders. In addition, the landscape/seascape team should consult WWF's Project and Program Management Standards, particularly the relevant sections on stakeholder engagement and the supporting documentation and tools provided. Where indigenous peoples are present and/or may be affected by the project, landscape/seascape teams should also consult implementation guidance that will be provided by WWF's safeguards team from time to time.

If a project involves potential involuntary resettlement, before project concept finalization, the landscape/seascape team shall publicly disclose final resettlement plans (including documentation of the consultation process) for 30 days, or 45 days if indigenous peoples exist, prior to project concept finalization in a culturally appropriate and inclusive manner. The Resettlement Action Plan (RAP) or Resettlement Policy Framework (RPF) must be accessible to key stakeholders, including project-affected groups, and should be available not only in English but also relevant local languages.

Finalizing Mitigation Plans

Before plans can be disclosed, the qualified safeguards expert must review and approve all final plans. The landscape/seascape team must also disclose to affected parties the final plans prior to implementation and any subsequent action plans prepared during project implementation. In all cases, disclosure should occur in a manner that is meaningful and understandable to the affected people for their consent.

Prior to moving to disclosure and implementation, the implementing office's CEO/country director (or delegate) must approve the assessments and mitigation plans, and document the approval.



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Sign-Off of Mitigation Plans

The final step of mitigation planning is securing sign-off from a qualified safeguards expert. Reviewers will assess the following:

- compliance with the safeguards framework
- adequacy and feasibility of the proposed safeguards mitigation measures and monitoring plans
- adequacy of consultations and communications with potentially impacted communities
- technical and financial capacity available and required to implement the project
- technical and financial capacity required for safeguards-related measures during the preparation and implementation of the project (e.g., having a qualified safeguards expert as part of the landscape/seascape team)
- plan to disclose all final safeguards documents

Financing

The cost of safeguarding actions must be incorporated into project budgets. This includes all associated costs, including pre-implementation work (such as screening, consultations, etc.), mitigation actions, monitoring, and reporting, as well as any actions taken to address negative impacts flagged during implementation.

Implementation

Actions identified in the risk mitigation plans must be incorporated into project activities and overseen along with other project activities. Responsibility for implementation of these actions lies fully with the implementing office, through the landscape lead under the accountability of the head of the office.

Mitigation activities may also need to adapt to changing project circumstances, including when new activities trigger additional safeguards actions.

If the proposed mitigation activities are not adequate, or if conditions within or outside of the project make it impossible to fulfill the safeguards, then WWF will work with funding and other partners to take appropriate action. This could include holding disbursements of funds until risks are fully addressed, or terminating projects where circumstances become untenable.

Monitoring and Reporting

During project implementation, safeguards compliance and performance against mitigation plans will be tracked along with other programmatic activities. At each performance-reporting stage, generally on a quarterly basis, the landscape/seascape team will revisit and report on the safeguards issues to assess their status and address any further issues that may arise. The qualified safeguards expert will review and approve reports including any additional or adapted action plans developed during project implementation. The qualified safeguards expert will maintain contact with the landscape/seascape team to obtain clarification on information provided, including where deemed necessary, participating in due diligence trips to the sites.

When projects have been classified as high risk, annual supervision missions are mandatory, during which qualified staff from a different office will conduct in-person site visits to directly assess progress addressing safeguards mitigation measures and recommend remedial action as necessary.



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Part VII: Responding to Grievances

WWF has multiple mechanisms through which those affected by WWF's projects can raise their grievances and seek resolution.

WWF Policy on Accountability and Grievance Mechanism

Under the safeguards framework, WWF will establish a tiered network-wide grievance mechanism to receive and respond to complaints related to the environmental or social impacts of WWF projects. The aim of the mechanism is to provide people fearing or suffering adverse impacts with the opportunity to be heard and assisted. This mechanism allows project-affected people to ask critical questions or complain about real or potential negative impacts. The mechanism aims to address concerns raised about a particular project, identify the root causes of the issue, and find and pursue options (including but not limited to dialogue and mediation) to resolve the grievance. It is an essential tool to foster cooperation between project implementers and project stakeholders, and to ensure adequate delivery of previously agreed-upon results.

Country- and Project-Level Grievance Redress Mechanisms

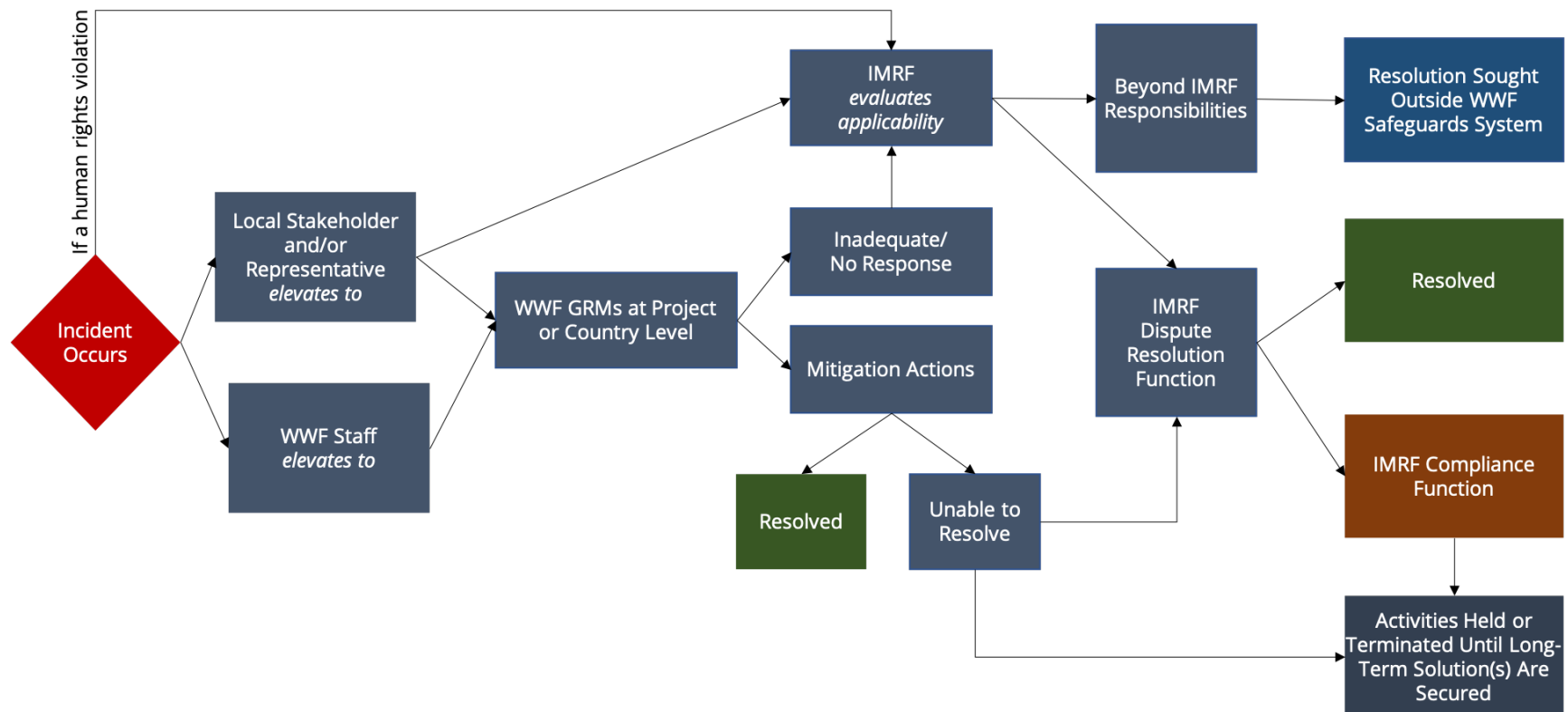
The aim of country- and project-level grievance redress mechanisms is to provide a forum through which stakeholders can secure satisfactory resolutions to concerns they may have regarding the implementation of WWF's safeguards and risk mitigation measures.

Country-level grievance redress mechanisms provide a forum for stakeholders to raise concerns and grievances about a project directly to the country's WWF office management, and mechanism to find satisfactory resolutions. Country-level grievance redress mechanisms should also consider localized cultural and linguistic needs and logistical constraints in their design.

The need for an additional project-level grievance redress mechanism will be established during the design phase of the project. A project-level grievance redress mechanism will not be needed for every project. For high-risk projects, project-level grievance redress mechanisms should be established. When needed, WWF will develop the project-level grievance redress mechanisms based on the specific risks at play locally and addressing cultural and linguistic needs, as well as logistical constraints.

WWF offices may also choose to establish their own country-level grievance redress mechanisms, either in addition to or instead of project-level grievance redress mechanisms.

High-level resolutions of grievances that cannot be addressed at project- or country-level may be escalated to the ombudsperson's office.



Part VIII: Ombudsperson's Office - Independent Monitoring and Review Function

WWF is establishing an ombudsperson's office, which will perform the independent monitoring and review function. This office is independent from WWF International line management and will report directly to the WWF International Board.

The independent monitoring and review function has three parts:

- *High-level dispute resolution.* The ombudsperson's office is intended to supplement localized grievance redress mechanisms. It provides an impartial mechanism for parties to resolve disputes through mediation. The grievance can be lodged by an affected party, WWF management, and/or WWF staff. All parties must agree to engaging in dispute resolution.

All cases received by the office will be logged transparently in a case-management system. A case file will be opened, and stakeholders will be informed about the progress of their case. The office will review the complaint and assess whether it is eligible for their consideration and, if so, determine the most appropriate method to deal with the complaint.

- *Compliance assessment.* The ombudsperson's office may also assess WWF's compliance with the safeguards framework. Assessments focus on compliance with relevant policies, standards, and procedures within the framework, and are independent of, but complementary to, WWF's routine internal assurance efforts. Where a compliance assessment determines that a project is not in compliance with WWF's safeguards framework, the concerned WWF offices will need to develop and implement a response plan to bring the project into compliance. The ombudsperson will monitor and keep track of actions taken.
- *Advisory.* The ombudsperson's office provides an advisory function to the WWF NET and WWF International Board. The office will provide periodic assessments, based on lessons learned and evolving international best practices, of how WWF might improve its safeguards processes.

Additional information on the work of this office and how it functions is available to all WWF staff.

Response Protocol on Human Rights

WWF takes alleged breaches of human rights extremely seriously. In the case where allegations are raised through any of the above mechanisms related to loss of life, loss of liberty, attacks on persons, torture, degrading treatment, or other forms of discrimination associated with WWF or partner activities and/or financing, including those by third parties that receive funds from WWF, a swift and thorough response by WWF is required. A response protocol has been developed that sets out how WWF will respond to these issues. The Human Rights Response protocol can be found on panda.org.



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Part IX: Documentation and Disclosure

Documentation

Each step in the safeguards framework requires documented assurance of its completion and, where applicable, WWF International Safeguards Unit or management sign-off. These documents, including but not limited to risk screenings, stakeholder engagement plans, mitigation plans, compliance reports, complaints, and mediation results, must be completed and held in the relevant project files. They also must be uploaded into an internal WWF global depository. Information in the depository will be provided to WWF staff at the appropriate time.

Disclosure

To strengthen accountability, the safeguards framework commits WWF to public disclosure of safeguarding actions. The WWF Network will develop, by early 2020, an external site managed by the WWF International Safeguards Unit, which will upload and maintain updated safeguards summary reports for all projects. WWF-US already has an external site in place on worldwildlife.org.

Conclusion

WWF operates in 100 countries, including in isolated and dangerous places where poaching and illegal activities threaten natural resources that both people and wildlife depend upon. In every place we operate, our goal is to work constructively with Indigenous Peoples and other local communities. Unless local people have a strong stake and rights in conservation, we cannot achieve our conservation goals.

And without secured access to critical natural resources, these vulnerable populations will continue to face mounting environmental, economic and physical risks.

Safeguards play a vital role in achieving WWF's vision of a future where people and nature thrive together. They guide how we engage local communities to identify ways that our work can help improve and protect their lives, rights and livelihoods while achieving conservation benefits for all. Our devotion to the framework cements our commitments to ensuring human rights are safeguarded throughout our work and the work of the partners we support.

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