

World Wildlife Fund – United States (WWF-US)

Accountability and Grievance Mechanism (WWF-AGM)

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World Wildlife Fund – United States (WWF-US) is the American affiliate of the global WWF network and is headquartered in Washington, D.C. It works to conserve nature and address major environmental challenges through science-based solutions, policy advocacy, and strategic partnerships. WWF-US focuses on biodiversity, climate change, forests, oceans, freshwater, and sustainable food systems, operating both domestically and internationally to advance its conservation mission. The organization collaborates with governments, communities, companies, and other stakeholders to promote evidence-based environmental solutions, influence policy, and support sustainable practices. It is part of the global WWF Network, which operates in over 100 countries.

As a Global Environment Facility (GEF) Implementing Agency, WWF-US has established an Accountability and Grievance Mechanism (WWF-AGM) to address potential breaches of WWF's policies and procedures, respond to community concerns related to specific projects, identify the root causes of conflict, and explore options for resolving grievances. The WWF-AGM is administered by the Senior Director for Public Sector Support, who serves as the Project Complaints Officer (PCO). While housed within WWF, the PCO operates independently of project teams and has full responsibility for managing and overseeing the grievance mechanism.¹

STANDARDS AND SAFEGUARDS

WWF-US's **Environmental and Social Safeguards Integrated Policies and Procedures (SIPP)** set out the organization's approach to managing environmental and social risks across its operations. The SIPP includes a comprehensive suite of policies, standards, and guidance documents, such as the Policy on Environmental and Social Risk Management, Policy on Protection of Natural Habitats, Policy on Involuntary Resettlement, Policy on Indigenous Peoples, and the Policy on Accountability and Grievance Mechanism. In addition, the SIPP encompasses standards on Pest Management, Physical Cultural Resources, Community Health, Safety, and Security, Stakeholder Engagement, and Public Consultation and Disclosure, along with specialized guidance for projects involving dams and detailed implementation arrangements.

To support effective application, the SIPP is accompanied by a robust set of annexes containing operational procedures and technical guidelines. Although tailored to WWF's specific operational context, the framework draws on leading international standards. It is also aligned with key multilateral instruments, including the United Nations Declaration on the Rights of Indigenous Peoples and International Labour Organization Convention No. 169 (Indigenous and Tribal Peoples Convention, 1989).

LAND TENURE

Land tenure rights and related grievances—including issues of ownership, access, usage, eviction, and displacement—are explicitly within the scope of WWF-US's grievance mechanism under the SIPP.

¹ WWF. n.d. Environment and Social Safeguards Integrated Policies and Procedures. Washington, DC. https://files.worldwildlife.org/wwfcmprod/files/Publication/file/5xod64bsim_Safeguards_Manual.pdf

WWF's **Policy on Involuntary Resettlement** (see Annex 6), outlines the organization's approach to land tenure in contexts involving conservation-related displacement or restrictions on access to natural resources. The framework recognizes a broad spectrum of legitimate tenure systems—including formal legal title, customary or traditional rights, and informal or de facto claims—and treats all as relevant in determining eligibility for safeguards and support measures.

Resettlement planning must include participatory assessments to identify and document existing land tenure arrangements. In situations where national legal systems do not adequately protect non-titleholders, WWF applies its own safeguards to ensure fair and consistent treatment. Preference is given to land-based compensation, and any replacement land must offer secure tenure and be of equal or greater value and productivity. In the case of Indigenous Peoples, collective land rights must be fully respected. Any project affecting their lands or resources requires the Free, Prior, and Informed Consent (FPIC) of the affected communities.

WWF's **Indigenous Peoples Policy** (see Annex 7) emphasize that land, territories, and natural resources are integral to Indigenous identity, culture, and livelihoods. Projects must include screening and social impact assessments to identify traditional tenure systems, including communal or seasonal land use and culturally significant sites. FPIC is a mandatory prerequisite for any activity involving Indigenous land or resources and must be obtained through customary governance systems.

Where Indigenous Peoples are affected, WWF requires the preparation of an Indigenous Peoples Plan (IPP) or an Indigenous Peoples Planning Framework (IPPF). These instruments must address potential tenure impacts and include safeguards to protect land rights. They must also be disclosed in accessible and culturally appropriate formats. Implementation must involve meaningful community participation, including in the monitoring of safeguard measures. WWF further prohibits any unwanted contact with Indigenous Peoples in voluntary isolation and is committed to protecting the integrity of their territories.

OUTREACH AND ADMISSIBILITY

There is no standalone education program dedicated to raising awareness of the grievance mechanism. Instead, responsibility for informing project-affected communities rests with the country-level Project Team. The Project Team must ensure that information about the Accountability and Grievance Mechanism (WWF-AGM)—including relevant contact details for both WWF and the Project Team—is made publicly accessible. This information should be clearly communicated during stakeholder consultations conducted as part of the project design phase.

To be considered admissible under the WWF-AGM, a complaint must allege actual or potential harm resulting from WWF's failure to comply with its environmental and social safeguard policies in a WWF-supported project. The complaint must relate specifically to WWF's actions or omissions and fall within the scope of its safeguard standards, such as those addressing land tenure, Indigenous Peoples' rights, or involuntary resettlement. Complaints concerning unrelated third parties are not eligible.

Anonymous complaints are not accepted; however, complainants may request that their identity remain confidential. WWF strictly prohibits any form of retaliation against individuals who submit a complaint or participate in an investigation. Any allegations of retaliation should be reported immediately to the Project Complaints Officer (PCO).

All services provided through the WWF-AGM are free of charge.

FILING A COMPLAINT

Complaints may be submitted by any group of two or more individuals who believe they are, or may be, adversely affected by a WWF-supported project. Authorized representatives may also submit a complaint on their behalf, provided they include documented proof of such authorization. The Accountability and Grievance Mechanism is designed to complement, rather than replace, existing

dispute resolution systems, and applies exclusively to WWF's environmental and social safeguard commitments.

Complaints can be submitted in the complainants' native language and should provide sufficient detail to enable a thorough review. Each complaint must include the names and contact details of the individuals or group submitting it. If filed by a representative, the submission must include proof of authorization to act on behalf of the affected parties. It should clearly identify the WWF-supported project or program in question and describe the actual or potential harm experienced or anticipated as a result of that project. Where possible, the complaint should reference the relevant WWF Environmental and Social Safeguards policy or provision believed to have been breached.

Complainants are encouraged to include any supporting information or documentation relevant to the case. A brief summary of steps already taken to resolve the issue—such as prior engagement with WWF project staff—should also be provided. If the complainants have suggestions for possible solutions or outcomes, these should be included in the submission. Finally, if confidentiality is requested, the complainants must state this clearly and provide reasons for the request.

DESCRIPTION OF THE PROCESS

The WWF AGM includes a Complaint Review Process that prioritizes direct dialogue and constructive engagement among all involved parties.

When a complaint is submitted, the WWF Project Complaints Officer (PCO) acknowledges receipt and assesses its eligibility within 10 business days, based on established criteria. The identity of the complainant remains confidential unless the individual expressly waives this right. If the complaint is deemed eligible, the PCO notifies the relevant Project Team and requests a formal response. The Project Team is required to respond within 10 business days, outlining how it intends to address the concerns raised and providing an anticipated timeline for resolution.

Following this response, the Project Team undertakes an investigation, which may include technical analysis, stakeholder consultations, and direct dialogue with the complainant and other relevant parties—unless confidentiality has been requested. Based on its findings, the Project Team collaborates with all stakeholders to develop a proposed action plan and timeline. The results—including the concerns raised, actions taken, conclusions reached, and next steps—are documented and submitted to the PCO. Where confidentiality has been requested, the PCO communicates the response directly to the complainant.

The grievance mechanism operates on the principles of voluntary compliance and internal accountability. Once an action plan has been agreed upon, the PCO is responsible for coordinating its implementation, including regular follow-up with affected parties and technical advisors through meetings, calls, or other forms of communication until the plan is fully carried out.