SAFEGUARD ON
STAKEHOLDER ENGAGEMENT
2023

Scope of application

This safeguard applies to WWF's place-based activities (hereafter, ‘activities’) and throughout the implementation of the safeguards process. For the purposes of this safeguard, WWF understands:

- **Stakeholders** as individuals of all genders and ages, groups, or organisations who might have an interest or stake in activities, could influence activities, or who may be impacted by activities. Stakeholders may further be classified into rights-holders, duty-bearers and other stakeholders:
  - Every person is entitled to human rights and is therefore a rights-holder. In the context of the activities, WWF focuses on engaging those rights-holders (individuals and groups) whose human and/or legal rights could be affected by WWF’s work.
  - **Duty-bearers** are those actors who have human rights duties and responsibilities towards rights-holders. States are the primary duty-bearers with the duty to respect, protect and fulfil human rights. However, WWF recognises that businesses and organisations, including our own, also have a responsibility to respect human rights and can play an important role in contributing to their promotion.

Objectives

The objectives of this safeguard are to:

- Respect the participation and consultation rights of rights-holders in the context of the activities.
- Provide for meaningful engagement with all stakeholders relevant to the activities, through an inclusive and ongoing process of interaction, conducted in good faith to support the development of strong, constructive, and responsive relationships that are based on trust and respect.
• Support the effective implementation of the safeguards process and therefore the identification and management of environmental and social risks in an appropriate and timely manner.

Requirements

Stakeholder engagement should fulfil its purpose without unnecessarily burdening stakeholders. Efforts to fulfil these requirements must therefore be proportionate to the proposed activities, their potential impacts, and WWF’s role with respect to the impacts.

1. A stakeholder analysis is undertaken as early as possible in the design of activities, or where applicable, an existing analysis is reviewed and updated as necessary. This should:
   a. Identify all relevant stakeholders, and within stakeholder groups, those who may be disadvantaged, structurally discriminated against or in vulnerable situations;
   b. Distinguish rights-holders from duty-bearers and other stakeholders and analyse the capacities of rights-holders to claim their rights and of duty-bearers to uphold their duties;
   c. Analyse rights to consultation and participation (including the right to Free, Prior and Informed Consent), and the respective duties of duty-bearers;
   d. Analyse the levels of power and vulnerability for different stakeholders;
   e. Analyse representative structures of stakeholders, especially of rights-holders;
   f. Analyse the relationships between different stakeholders, including existing conflicts or tensions;
   g. Analyse stakeholder needs and interests in the landscape and how these relate to WWF’s conservation interests.

2. Based on the stakeholder analysis, the most appropriate strategy is determined to engage the different identified stakeholders. This can be described in a Stakeholder Engagement Plan (SEP). The engagement process and actions - including the level of engagement - must be commensurate and tailored to the type (e.g. rights-holders, duty-bearers, others) and
capacities of stakeholders, any relevant participation and consultation rights, the type of activities, socio-political complexities, as well as potential impacts of activities on the stakeholders.

3. Stakeholders are provided with relevant, objective, meaningful, understandable, and easily accessible information about the proposed activities, including on the purpose, nature and duration of the activities, and any opportunities, benefits, risks and impacts that may arise from their implementation. This must also include providing information about proposed engagement processes and mitigation actions, and available grievance mechanisms. Such information must be provided prior to implementation and any required consultations in a timeframe that allows for informed participation.

4. Appropriate channels for stakeholder feedback (including grievance mechanisms) are made accessible to stakeholders to enable them to raise their views and concerns on a continuous basis. Stakeholder feedback must be responded to accordingly.

5. Planning and implementation of stakeholder engagement in the context of the activities must adhere to the following, supported by qualified expertise in the relevant fields:

   a. Stakeholder engagement begins as early as possible in the design of activities. Engagement is carried out on a continuous basis through implementation, monitoring, evaluation of activities, and throughout the safeguards process. Stakeholder engagement is adjusted based on stakeholder feedback and as new risks and impacts arise.

   b. Stakeholder engagement is carried out in culturally appropriate formats and in a non-discriminatory and gender-responsive manner, seeking to ensure the inclusion and effective participation of persons with disabilities and those groups and individuals who may be in vulnerable situations. This may include, for example, ethnic or other minorities, women, children and youth, and older persons.

   c. Engagement is carried out free of external manipulation, interference, coercion, and intimidation.
d. Stakeholder engagement is carried out in a conflict-sensitive manner, seeking to ensure that engagement with WWF does not create or exacerbate tensions between or within stakeholder groups or put stakeholders at risk of harm.

e. When activities may affect Indigenous Peoples and/or their rights, lands, territories, resources, traditional livelihoods and cultures, or any other potentially affected peoples to whom the Safeguard on Indigenous Peoples applies, engagement and consultations with these groups are carried out adhering to the principles of Free, Prior and Informed Consent (FPIC).

f. Other rights-holders are consulted in appropriate ways, including through their own representative institutions, to achieve their active, effective, informed and meaningful participation in decision-making processes relevant to them in the context of the activities. This may require informing them about their rights to participation and consultation and strengthening capacities to support active and effective participation.

g. Where appropriate and feasible, stakeholder engagement with duty-bearers should include encouraging them to uphold and protect the rights of rights-holders.

6. The implementation and the quality of stakeholder engagement must be continuously monitored.

7. Stakeholder engagement is documented. At the minimum, this must include any consultations\(^1\) carried out, issues or concerns raised by stakeholders, and decisions taken or agreements made as a result of stakeholder feedback or engagement actions. Such

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\(^1\) For the purposes of this document, consultations are understood as one form of engagement, referring to a more formal, two-way process of communication and information exchange between WWF and stakeholders with the objective of seeking stakeholder inputs and understanding their views, preferences, concerns and expectations regarding a particular issue or proposed activities, interventions or decisions. Consultations are complemented by other types of engagement, including more informal interactions and dialogue on a regular basis, disclosure and sharing of information, negotiation, joint decision-making, and effective feedback and grievance mechanisms.
documentation must be retained together with other implementation records of the activities.

8. Where WWF funds or supports a government agency or other third party to carry out activities, WWF expects this party to fully observe safeguards requirements in such activities, including with respect to the participation and consultation rights of rights-holders. WWF reserves the right to withdraw support if its safeguards requirements are not met.

**Relationship to other safeguards**

Grievance Mechanisms are a fundamental pillar of stakeholder engagement and an essential part of implementing WWF’s activities. This safeguard is therefore applied alongside that for Grievance Mechanisms.

Whenever Indigenous Peoples are present in the landscape, this safeguard must be applied alongside the Safeguard on Indigenous Peoples.