

**U.S. House of Representatives**  
**Committee on Natural Resources**  
**Washington, DC 20515**

December 16, 2019

Mr. Cristián Samper  
President and CEO  
Wildlife Conservation Society  
2300 Southern Boulevard  
Bronx, New York 10460

Members of the Committee on Natural Resources (Committee) are continuing to investigate allegations of various reports of torture, sexual assault, and extrajudicial killings committed by eco-guard forces abroad funded in part by U.S. government-issued grants. As a result of this investigation, the Department of the Interior (Department) withheld \$12.3 million in Fiscal Year (FY) 2018 funds for certain international conservation grants until proper oversight mechanisms are in place.<sup>1</sup> Several organizations have yet to be awarded FY 2018 funds, including the World Wildlife Foundation (WWF) and the Wildlife Conservation Society (WCS).

The Committee began its bipartisan investigation after reports surfaced that WWF funded rangers who tortured, raped, and murdered indigenous and local people abroad.<sup>2</sup> In the course of this investigation, the Committee acquired and reviewed several hundred pages of documents, including multiple reports outlining years of human rights abuse cases associated with WWF's partners.

While allegations against WWF are very disturbing, a broader question exists about potential taxpayer-funded human rights violations. We remain deeply concerned about reports of human rights abuses in areas receiving financial support from the U.S. government.

For many years, U.S. taxpayer dollars have funded conservation efforts in Africa through grants awarded by the Department and other federal agencies.<sup>3</sup> Since 2010, WCS has received at least \$28 million from the U.S. Fish and Wildlife Services (USFWS) International Affairs (IA) Office at the Department for international conservation programs in Africa.<sup>4</sup> Of that amount, at least \$19 million of

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<sup>1</sup> Letter from Hon. Susan Combs, Assistant Sec'y Pol'y, Mgmt., & Budget, U.S. Dep't of the Interior to Rep. Raúl Grijalva, Chair, H. Comm. on Nat. Res. (Sept. 17, 2019) (on file with Comm.).

<sup>2</sup> Katie J.M. Baker and Tom Warren, *WWF Funds Guards Who Have Tortured and Killed People*, BUZZFEED, (Mar. 4, 2019), <https://www.buzzfeednews.com/article/tomwarren/wwf-world-wde-fund-nature-parks-torture-death>.

<sup>3</sup> See generally WILDLIFE CONSERVATION SOCIETY, *IMPACT REPORT* 47-49 (2019); WILDLIFE CONSERVATION SOCIETY, *CONSERVATION IMPACT REPORT* 32-35, 56 (2017); WILDLIFE CONSERVATION SOCIETY, *ANNUAL REPORT* 67-69, 92 (2016); Aili Pyhälä, Ana Osuna Orozco, and Simon Counsell, *PROTECTED AREAS IN THE CONGO BASIN: FAILING BOTH PEOPLE AND BIODIVERSITY?* 133 (2016).

<sup>4</sup> See *Project Summaries*, U.S. FISH & WILDLIFE SERV. INT'L AFFAIRS (last visited Dec. 4, 2019), <https://www.fws.gov/international/grants-and-reporting/project-summaries.html> (between 2010 and 2018, WCS received grants through the Wildlife Without Borders-Africa Program, the African Elephant Conservation Fund, and the Wildlife Without Borders-Great Ape Conservation Fund totaling \$28,982,184).

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those funds were grants tied to law enforcement activities.<sup>5</sup> This funding has been spread across several countries, including the Republic of Congo and Cameroon.<sup>6</sup>

Human rights and environmental advocacy organizations, such as Rainforest Foundation UK (RFUK) and Survival International, have detailed human rights abuses in areas managed by WCS in the Republic of Congo. Based on these allegations we are interested in better understanding how WCS utilizes federal grant money.

For example, a 2017 report by RFUK focuses on two parks, Conkoutai-Douli National Park (CDNP) and Naoublé-Ndoki National Park (NNNP), for which WCS and the Congolese government share responsibility.<sup>7</sup> In 2014, WCS was delegated “full park management authority” of NNNP by the government, including the ability to expand the park’s ranger force.<sup>8</sup> This report documents violence in these parks perpetrated by eco-guards including the beating of a young villager and the shooting of villagers, which resulted in three deaths and two injuries.<sup>9</sup>

Survival International alleges that eco-guards in the Northeast Republic of Congo, including NNNP, supported by WCS, have a decades-long history of abusing indigenous people.<sup>10</sup> Survival International’s allegations document abuses at the hands of eco-guards which include beatings, shootings, imprisonment, theft, and destruction of homes, occurring between 2004 and 2017.<sup>11</sup> Survival International’s report also includes a news report statement that highlights the abuses against indigenous rainforest tribes such as the Bayaka. News media has also reported that “[t]he ‘eco-guards’ of the Wildlife Conservation Society (WCS) [...] are accused of regularly beating Mbendjele [Bayaka], for ‘simply being Mbendjele.’”<sup>12</sup>

Since 2010, USFWS IA has provided WCS with at least \$2,680,000 in grants to support law enforcement activities for projects in the Republic of Congo, including grants for CDNP and NNNP.<sup>13</sup> Based upon WCS’s authority over eco-guards and the receipt of U.S. government funds, we seek to determine whether taxpayer dollars were inadvertently used to support human rights abuses.

Our concern regarding human rights abuses, however, is not limited to the abovementioned incidents. The findings of these reports and others produced by WWF show that human rights abuses are not limited to one park or even one country. In fact, on October 31, 2019, President Trump announced

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<sup>5</sup> *Id.* (between 2010 and 2018, WCS received grants with a law enforcement component through the Wildlife Without Borders-Africa Program, the African Elephant Conservation Fund, and the Wildlife Without Borders-Great Ape Conservation Fund totaling \$19,51,964).

<sup>6</sup> *Id.*

<sup>7</sup> Inès Ayari and Simon Counsell, THE HUMAN COST OF CONSERVATION IN REPUBLIC OF CONGO: CONKOUATI-DOULI AND NOUABALÉ-NDOKI NATIONAL PARKS AND THEIR IMPACT ON THE RIGHTS AND LIVELIHOODS OF FOREST COMMUNITIES 20 (2017).

<sup>8</sup> WILDLIFE CONSERVATION SOCIETY, IMPACT REPORT (2019) at 24.

<sup>9</sup> Inès Ayari and Simon Counsell at 72.

<sup>10</sup> SURVIVAL INTERNATIONAL, HOW WILL WE SURVIVE? BAKA CAMEROON 73, <https://assets.survivalinternational.org/documents/1683/how-will-we-survive.pdf>.

<sup>11</sup> *Id.* at 76-94.

<sup>12</sup> *Id.* at 80.

<sup>13</sup> See *Project Summaries*, *supra* note 4 (between 2010 and 2018, WCS, WWF, and African Parks Network received at least \$10,880,107 in grants for projects in the Republic of Congo with a law enforcement component through the Wildlife Without Borders-Africa Program, the African Elephant Conservation Fund, and the Wildlife Without Borders-Great Ape Conservation Fund).

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Cameroon would no longer be eligible to receive aid under the African Growth and Opportunity Act based on the country's failure to address human rights violations being committed by Cameroonian security forces.<sup>14</sup> Since 2010, WCS has received more than \$1,302,600 in USFWS grants related to law enforcement activities for projects in Cameroon alone.<sup>15</sup> Given the clear disregard for human rights by security forces, we are concerned that eco-guards, supported by taxpayer dollars, in Cameroonian parks have also committed acts of human rights abuses.

Therefore, we request information related to WCS's awareness of the occurrence of human rights abuses, funding for eco-guards or law enforcement that committed human rights abuses, and policies addressing the rights of indigenous and local peoples. We recognize the important role international conservation grants play in protecting wildlife, but the United States cannot be party to violations of basic human rights. To assist us with our oversight activities, please produce the following documents as soon as possible, but no later than December 30, 2019:

1. Documents sufficient to describe any and all grants, contracts, loans, and program-related investments to WCS from the U.S. Government for anti-poaching efforts or law enforcement activities that wholly or partially support armed rangers or paramilitary forces from January 1, 2003 to the present. The description should include corresponding program locations, how the funds were to be used under the grant, the total amount of the grant, the duration of the grant, and any reports or other documents provided to the U.S. granting agency describing the outcomes of the grant, including but not limited to a final report.
2. WCS's current policies, procedures, and training materials related to basic human rights;
3. All documents, including but not limited to, internal memoranda, memoranda of understanding, policies, and procedures, related to WCS's reporting of human rights abuses; and
4. All documents, including but not limited to, internal memoranda and reports, showing WCS's awareness of incidents of violence against indigenous or local people in areas of WCS's operation funded through grants issued by or cooperative agreements with the Department.

Please deliver your response to room 1329 of the Longworth House Office Building. refer to the attached instructions on how to respond to this document request. An attachment contains additional instructions for responding to this request.

Please contact the Committee on Natural Resources Oversight and Investigations Subcommittee staff at (202) 225-7107 with any questions about this request. Thank you for your prompt attention to this matter.

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<sup>14</sup> Presidential Message to the Congress (Oct. 31, 2019), <https://www.whitehouse.gov/briefings-statements/message-to-the-congress/>.

<sup>15</sup> See *Project Summaries*, *supra* note 4 (between 2010 and 2018, WCS, WWF, and African Parks Network received at least \$10,291,706 in grants for projects in Cameroon with a law enforcement component through the Wildlife Without Borders-Africa Program, the African Elephant Conservation Fund, and the Wildlife Without Borders-Great Ape Conservation Fund).

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Sincerely,



Rob Bishop  
Ranking Republican  
Committee on Natural Resources



Louie Gohmert  
Ranking Member  
Subcommittee on Oversight & Investigations  
Committee on Natural Resources



Tom McClintock  
Ranking Member  
Subcommittee on Waters, Oceans, & Wildlife  
Committee on Natural Resources

Enclosure

cc: The Honorable Raúl M. Grijalva, Chairman, Committee on Natural Resources  
The Honorable TJ Cox, Chairman, Subcommittee on Oversight and Investigations  
The Honorable Jared Huffman, Chairman, Subcommittee on Water, Oceans, and Wildlife  
The Honorable David Bernhardt, Secretary, U.S. Department of the Interior