



July 2024

WILDLIFE TRAFFICKING

Agencies Should Improve Efforts to Protect Human Rights in Overseas Activities

GAO Highlights

Highlights of [GAO-24-106553](#), a report to the Committee on Natural Resources, House of Representatives

Why GAO Did This Study

Wildlife trafficking—the illegal trade and poaching of wild animals—is a transnational crime that threatens security, economic prosperity, and conservation efforts, according to State. In recent years, media reports have alleged that park rangers trained by U.S.-funded partner organizations overseas have committed a range of human rights violations, including sexual assault and murder.

GAO was asked to review human rights protections in U.S. efforts to combat wildlife trafficking. This report addresses (1) changes agencies have made to human rights protection mechanisms in efforts to combat wildlife trafficking since 2020; and the extent agencies have (2) planned for and (3) monitored the effectiveness of social safeguards for selected awards. GAO reviewed documentation, including for a non-generalizable sample of 19 awards, and conducted fieldwork in the Democratic Republic of the Congo and Tanzania.

What GAO Recommends

GAO is making nine recommendations, including that USAID ensure partners submit social safeguards plans in a timely manner; USAID, FWS, and State ensure partners provide monitoring updates on social safeguards; and FWS and State require partners to report abuse allegations in a timely manner. USAID, FWS, and State agreed with the recommendations.

View [GAO-24-106553](#). For more information, contact Kimberly Gianopoulos at (202) 512-8612 or gianopoulosk@gao.gov.

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What GAO Found

The U.S. Agency for International Development (USAID), the Department of the Interior's U.S. Fish and Wildlife Service (FWS), and the Department of State award funds to partner organizations that support park rangers' efforts to protect wildlife around the world. Since 2020, these agencies have taken steps to enhance human rights protection mechanisms, or social safeguards, to help prevent human rights abuses in ranger activities they support. For example, USAID published guidance for partners on social safeguards, including on community consultation and engagement; consideration of Indigenous Peoples' rights; human rights training for park rangers; and grievance mechanisms. FWS began a pilot to assess social risks and safeguards for its awards. In addition, State began adding language on social safeguards to combating wildlife trafficking award notices.

While agencies have taken steps to ensure partners plan for social safeguards to protect human rights, GAO identified gaps in selected awards. For example, USAID generally required partners to provide social safeguards plans, but several of its partners, among the awards GAO reviewed, did not provide the plans in a timely manner. These partners provided plans 6 to 21 months after their due dates. As a result, USAID did not have timely information to determine whether partners had designed appropriate social safeguards to address human rights risks and prevent abuses from occurring in projects they support.

GAO also found weaknesses in agencies' monitoring of social safeguards in the 19 awards GAO reviewed. For example, the agencies have not ensured that all partners provide updates in monitoring reports on the status and effectiveness of planned safeguards to protect human rights. In addition, while USAID requires partners to report human rights abuse allegations to USAID in a timely manner, FWS and State do not have similar clear requirements. GAO identified abuse allegations that State was unaware of, including an alleged incident involving sexual abuse by a ranger. Without ensuring partners provide monitoring updates and notify agencies of abuse allegations in a timely manner, agencies may be unaware of abuses, or of whether social safeguards are working as intended to protect Indigenous Peoples or other vulnerable populations.

Rangers Work to Protect Wildlife at Parks and Protected Areas Around the World



Source: GAO (photos). | GAO-24-106553

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Abbreviations

ADS	Automated Directives System
ANPN	Gabon's National Agency for National Parks
CAR	Central African Republic
CARPE	Central Africa Regional Program for the Environment
DRC	Democratic Republic of the Congo
E.O.	Executive Order
EMMP	Environmental Mitigation and Monitoring Plan
FAA	Foreign Assistance Act
FPIC	Free, Prior, and Informed Consent
FWS	U.S. Fish and Wildlife Service
FZS	Frankfurt Zoological Society
GRM	Grievance and Redress Mechanisms
IEE	Initial Environmental Examination
INL	Department of State's Bureau of International Narcotics and Law Enforcement Affairs
JGI	The Jane Goodall Institute
MOU	Memorandum of Understanding
NGO	Non-governmental organization
NOFO	Notice of Funding Opportunity
RTI	Research Triangle Institute, International
STEP	Southern Tanzania Elephant Program
TEP	Technical Evaluation Panel
USAID	United States Agency for International Development
VF	Virunga Foundation
WCS	Wildlife Conservation Society
WWF	World Wildlife Fund

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July 23, 2024

The Honorable Bruce Westerman
Chairman
The Honorable Raúl M. Grijalva
Ranking Member
Committee on Natural Resources
House of Representatives

Wildlife trafficking—the illegal trade and poaching of wild animals—is a serious transnational crime that threatens security, economic prosperity, the rule of law, long-standing conservation efforts, and human health, according to the Department of State. The U.S. government has supported efforts to combat wildlife trafficking and protect biodiversity around the world through a range of activities implemented by federal agencies, in cooperation with partner organizations in the field. These activities include support from the U.S. Agency for International Development (USAID), the Department of the Interior’s U.S. Fish and Wildlife Service (FWS), and State’s Bureau of International Narcotics and Law Enforcement Affairs (INL) for park rangers and anti-poaching units that work to protect wildlife in parks and protected areas.

Some sources allege that the existence and management of conservation areas have detrimental effects on the self-determination and livelihoods of locals and Indigenous Peoples.¹ Conflict between people and wildlife over crops, livestock grazing land, or human safety may also contribute to poaching. In addition, in some parks and protected areas, ongoing civil conflict and the presence of armed groups present a risk to park rangers, as well as local communities and Indigenous Peoples. According to international and non-governmental organization (NGO) reporting, an estimated 150 park rangers are killed in the line of duty worldwide each

¹See Congressional Research Service, *Wildlife Poaching and Trafficking in Africa: An Overview*, IF11923 (Washington, D.C.: Sept. 13, 2021) and GAO, *Combating Wildlife Trafficking: Agencies Work to Address Human Rights Abuse Allegations in Overseas Conservation programs*, [GAO-21-139R](#) (Washington, D.C.: Oct. 2, 2020).

year.² However, in recent years, NGO and media reports have raised concerns and alleged that partner organizations funded by the U.S. government have played a role in training and equipping forces who subsequently committed a range of human rights violations, including sexual assault and extrajudicial killings.³ Among the victims of these alleged abuses are local communities and Indigenous Peoples living near protected areas in Africa and Asia. In our prior work in October 2020, we examined agencies' mechanisms to prevent U.S.-funded efforts to combat wildlife trafficking from supporting human rights abuses.⁴

We were asked to review human rights protection mechanisms and monitoring, among other things, related to U.S. efforts to combat wildlife trafficking. This review updates and expands upon our prior work published in an October 2020 report. This report addresses (1) what changes U.S. agencies have made to their mechanisms for safeguarding human rights, or social safeguards, in efforts to combat wildlife trafficking since 2020; (2) the extent to which agencies and implementing partners have planned for social safeguard mechanisms for selected awards; and (3) the extent to which agencies and implementing partners have monitored and assessed the effectiveness of social safeguard mechanisms for selected awards.⁵

To address these objectives, we reviewed documentary and testimonial information from USAID, FWS, and State on their social safeguard mechanisms related to efforts to combat wildlife trafficking since 2020.

²For example, see Matthew Morley, *Why conservation will fail if we fail our wildlife rangers*, (International Fund for Animal Welfare: Jan. 3, 2024), accessed May 6, 2024, <https://www.ifaw.org/people/opinions/why-conservation-will-fail-if-we-fail-our-wildlife-range-rs#:~:text=Globally%2C%20we%20estimate%20that%20at,connected%20to%20other%20organized%20crimes>; and World Bank, *Risking Lives to Protect Wildlife and Wildlands: Stories from Rangers in the Field*, (July 30, 2020), accessed May 6, 2024, <https://www.worldbank.org/en/news/feature/2020/07/30/risking-lives-to-protect-wildlife-and-wildlands-stories-from-rangers-in-the-field>.

³ GAO-21-139R.

⁴GAO-21-139R.

⁵For the report, we refer broadly to the following four human rights protection mechanisms, or social safeguards, which are commonly considered as positive practices for projects with potential impacts on local communities and Indigenous Peoples: (1) community consultation and engagement; (2) consideration of Indigenous Peoples and Free, Prior, and Informed Consent (FPIC) principles; (3) human rights training for rangers, ecoguards, and law enforcement; and (4) Grievance and Redress Mechanisms (GRM). We generally refer to these as social safeguard mechanisms. For more information on these social safeguards, see background.

We selected a non-generalizable, judgmental sample of 19 USAID, FWS, and State awards to review how the agencies and their partners planned for and monitored the implementation and effectiveness of any social safeguard mechanisms for ranger activities under the awards. The 19 awards we reviewed included seven USAID awards, six FWS awards, and six State awards. We focused our selection on awards with ranger activities in the two countries and locations where we conducted fieldwork—the Democratic Republic of the Congo (DRC) and Tanzania. We selected awards and locations for fieldwork that had ongoing activities in fiscal year 2023, based on factors such as scope of planned ranger activities and social safeguards in awards, awards with relatively higher estimated funding for ranger activities, and locations with prior human rights abuse allegations in the areas receiving support. We did not corroborate whether any allegations of abuse actually occurred, as this was not within the scope of our review.

To describe funding for ranger activities in Africa and Asia, we reviewed estimated USAID allocations and estimated FWS and State obligations for ranger activities, by country and by award, for fiscal years 2020 to 2022 (the most recent available data at the time of our review). Funding generally represents estimates because agencies do not readily track funding specifically for ranger activities, which are often encompassed in broader combating wildlife trafficking and conservation awards, and because of differences in how agencies defined such activities. To assess the reliability of these data, we reviewed the data and interviewed agency officials to identify and rectify any missing or erroneous data. We determined that the funding data were sufficiently reliable to summarize agencies' estimated information on funding for ranger activities by country and award during this period.

For each of our selected awards, we reviewed award documentation provided by the agencies for information on ranger activities and any related social safeguards. This documentation included application and proposal materials, project plans, risk analyses and impact assessments, award agreements, modifications, and periodic monitoring reports. We also conducted interviews with agency and implementing partner officials, as well as rangers and community members at several project sites that we visited during our fieldwork. We compared how agencies planned for and monitored the implementation and effectiveness of social safeguards in selected awards with agency policies and procedures, award terms and conditions, federal internal control standards, and Executive Order (E.O.) 13985, *Advancing Racial Equity and Support for Underserved Communities Through the Federal Government* to identify any gaps or

areas for improvement.⁶ Because we judgmentally selected our awards and locations for fieldwork, our findings cannot be generalized. For more information about our objectives, scope, and methodology, see appendix I.

We conducted this performance audit from January 2023 to July 2024 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that our findings provide a reasonable basis for our findings and conclusions based on our audit objectives.

Background

Human Rights Abuse Allegations

Since the mid-2000s, multiple sources have documented allegations of human rights abuses by park rangers in several countries, including the DRC, India, Nepal, the Republic of the Congo, and Tanzania.⁷ Some of these allegations have occurred in areas where USAID, FWS, and State provide support. NGOs and news media have collected testimonies and carried out investigations regarding allegations that these human rights abuses occurred in or near national parks and protected areas in these countries.⁸ These reports include allegations against park rangers who received support from NGOs that received funding from U.S. agencies and other sources. Allegations have included claims that park rangers committed rape, murder, torture, forced labor, arbitrary detention, destruction of property, and illegal house searches.

Some sources allege that the existence and management of conservation areas have detrimental effects on the self-determination and livelihoods of local communities and Indigenous Peoples. They also allege that some governments and implementing partners have forcibly relocated local communities and Indigenous Peoples from parks or protected areas without considering their rights. As we have previously reported, conservation restrictions due to the creation and management of national parks and protected areas may prevent local people from accessing

⁶86 Fed. Reg. 7009 (Jan. 25, 2021).

⁷We did not independently review or corroborate these allegations, as this was not within the scope of our review.

⁸[GAO-21-139R](#).

traditional lands and carrying out subsistence activities, such as hunting, fishing, and farming, contributing to their malnutrition.⁹

Leahy Vetting and Social Safeguards Mechanisms

Statutory provisions commonly referred to as “Leahy Laws” prohibit the U.S. government from using certain funds to assist units of foreign security forces where there is credible information that the unit has committed a gross violation of human rights.¹⁰ According to State officials, Leahy vetting applies for foreign security force units, and in some cases individuals, that receive training, equipment, or other assistance funded through applicable State or Department of Defense funding sources.¹¹ We previously reported that State and USAID generally consider park rangers to operate within units of a foreign security force—authorized to use force, search, detain, or arrest—and therefore subject to Leahy vetting, according to agency officials.¹² State does not vet every unit that patrols a park for human rights abuses prior to providing U.S. support to park rangers, when the Leahy laws that apply to State and State’s Leahy vetting policies and procedures do not require such vetting.¹³ For example, some park rangers who receive U.S. support work alongside armed authorities of the host government, such as the military. In such cases, State does not vet the armed authorities of the host government if they do not receive applicable U.S. assistance, according to State officials. USAID officials added that for parks and protected areas where USAID provides support, some groups which are referred to as park rangers do not meet the definition of security forces for purposes of Leahy vetting.

In October 2020, we reported that Leahy vetting of park rangers for human rights violations before providing U.S. support was the primary human rights protection mechanism used by agencies for efforts to

⁹[GAO-21-139R](#).

¹⁰See 22 U.S.C. § 2378d (applicable to assistance furnished under the Foreign Assistance Act of 1961, as amended, and the Arms Export Control Act), as amended, and 10 U.S.C. § 362 (applicable to amounts made available to the Department of Defense).

¹¹According to State officials, Leahy approval of a security force unit is good for 1 year, and State must vet individuals again if their unit continues to receive support from applicable sources.

¹²[GAO-21-139R](#).

¹³According to State officials, State is only responsible for vetting units that receive U.S. foreign assistance funds. It does not vet units that may be present in a protected area but do not receive U.S. foreign assistance. It is State’s responsibility to verify that units have not been involved in human rights violations prior to receiving assistance.

combat wildlife trafficking. We also reported that agencies were implementing changes in response to congressional committee report directives on safeguarding human rights.¹⁴ For example, the committee of conference report considering the Further Consolidated Appropriations Act, 2020 directed the Department of the Interior, State, and USAID to include provisions related to community consultation and consent, consideration of land or resource claims by affected local communities or Indigenous Peoples, training and monitoring of rangers, and grievance mechanisms in agreements with implementing partners.¹⁵ Similar language directed at State and USAID was included in committee reports accompanying appropriations legislation for fiscal years 2021 and 2022.¹⁶

In January 2021, the President issued E.O. 13985, which states it is the policy of the administration that the federal government should pursue a comprehensive approach to advancing equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality.¹⁷ We previously reported that State and USAID have committed to incorporating racial and ethnic equity into U.S. foreign assistance programs and to supporting historically marginalized groups around the world, and the agencies had updated high-level strategies to more directly advance equity and support for marginalized groups in response to E.O. 13985.¹⁸

¹⁴[GAO-21-139R](#).

¹⁵For the Department of the Interior, the 2020 directive applied for funds provided through interagency agreement with USAID. For 2020, see House Appropriations Committee Print 38-679 at 591, 1056. This committee print was incorporated by reference as an explanatory statement of a committee of conference pursuant to section 4 of Pub. L. No. 116-94.

¹⁶Similar language was also included in committee reports accompanying appropriations legislation for fiscal year 2023, but the committee of conference for that legislation directed that this language be applied to funds made available for law enforcement activities in national parks and protected areas rather than funds made available for national parks and protected areas generally.

¹⁷E.O. No. 13985 identifies the following individuals as belonging to underserved communities: Black, Latino, and Indigenous and Native American persons, Asian Americans and Pacific Islanders and other persons of color; members of religions minorities; lesbian, gay, bisexual, transgender, and queer (LGBTQ+) persons; persons with disabilities; persons who live in rural areas; and persons otherwise adversely affected by persistent poverty or inequality.

¹⁸GAO, *Foreign Assistance: State and USAID Are Taking Actions to Advance Equity Abroad and Mitigate Challenges*, [GAO-22-105112](#) (Washington, D.C.: July 2022).

United Nations and World Bank standards and guidance generally refer broadly to four human rights protection mechanisms, or social safeguards. These are commonly considered as positive practices for projects with ranger activities that have potential impacts on local communities and Indigenous Peoples and are generally referred to as: (1) community consultation and engagement, (2) consideration of Indigenous Peoples and free, prior, and informed consent (FPIC) principles, (3) human rights training for rangers, and (4) Grievance and Redress Mechanisms (GRM).¹⁹ These practices are also reflected in the congressional committee report language described above. We generally refer to these as social safeguards mechanisms (see fig. 1).

¹⁹For example, see the International Labor Organization Convention No. 169 on Indigenous and Tribal Peoples Articles 6 and 17, in the United Nations, International Labor Organization, *Indigenous and Tribal Peoples Convention, 1989*. Geneva; and the World Bank, *World Bank Environmental and Social Framework*. Washington, D.C., 2016.

Figure 1: Social Safeguards Mechanisms to Protect Human Rights



Source: GAO (analysis); GAO (photos top left, bottom left, bottom right); Roger de la Harpe/stock.adobe.com (photo top right). | GAO-24-106553

- Community consultation and engagement may include early and ongoing engagement and consultation with stakeholders, including communities, groups, or individuals affected by proposed projects, and with other interested parties, regarding a proposed project and its potential impacts.

-
- Consideration of Indigenous Peoples and FPIC principles consists of a heightened standard for consultation for projects that may impact Indigenous Peoples and involve land-resource claims.²⁰
 - Human rights training for rangers and similar personnel may address topics such as safe and fair application of the law, including respect for human rights and avoiding intimidation or unnecessary use of force.
 - Culturally appropriate and accessible GRM may provide an avenue for communities to report human rights abuse, misconduct, or other grievances related to a project's environmental or social impacts, and for resolving issues (see fig. 2).

²⁰Under USAID guidance, FPIC is a heightened standard for consultation with Indigenous Peoples in accordance with international standards, based on the principle that before any action is taken which would affect Indigenous Peoples, the affected peoples or communities must give approval for the activity to move forward. Indigenous Peoples must have full information about the activity and its potential impact for consent to be considered meaningful ("informed"). They should provide consent before an activity begins ("prior"). Finally, it is critical that they not feel coerced or pressured to agree to it ("free").

Figure 2: Tanzanian Village Leader Explaining Community Bulletin Board Illustrating Local Grievance and Redress Mechanism



Source: GAO (photo). | GAO-24-106553

USAID, FWS, and State Support for Ranger Activities since Fiscal Year 2020

USAID, FWS, and State/INL supported a variety of ranger activities in collaboration with NGO partners in Africa and Asia in fiscal years 2020 to 2022.²¹ According to USAID and State officials, ranger funding supports such things as:

- ranger patrols within protected areas to detect and deter poaching;
- related training for staff and rangers, and technology to support these efforts;
- prevention of corruption related to the illegal wildlife trade;

²¹We reviewed information and data on USAID, FWS, and State ranger activities in Africa and Asia because of prior ranger-related human rights abuse allegations for U.S.-funded activities in those regions. See appendix I for additional details on our objectives, scope, and methodology.

- training and technical equipment and supplies to enhance counter-wildlife trafficking and crime-scene investigation capabilities; and
- activities for community-managed protected areas, including community-led or joint community-government patrols.

According to FWS officials, FWS's ranger funding supports park rangers who manage or patrol protected areas. Patrolling includes scheduled field surveillance of a protected area (such as a park or reserve) to protect wildlife and deter illegal activities. Funding may also support other law enforcement personnel who have the authority to carry weapons or to make arrests.

Figure 3 includes a photo of village game scouts at a ranger patrol post in Mbuyuni, Tanzania, and a photo of rangers demonstrating equipment they use to carry out their duties in Garamba National Park, DRC. USAID and State provided support for ranger activities at these locations in fiscal years 2020 to 2022.

Figure 3: U.S.-Supported Village Game Scouts and Rangers in Tanzania and the Democratic Republic of the Congo

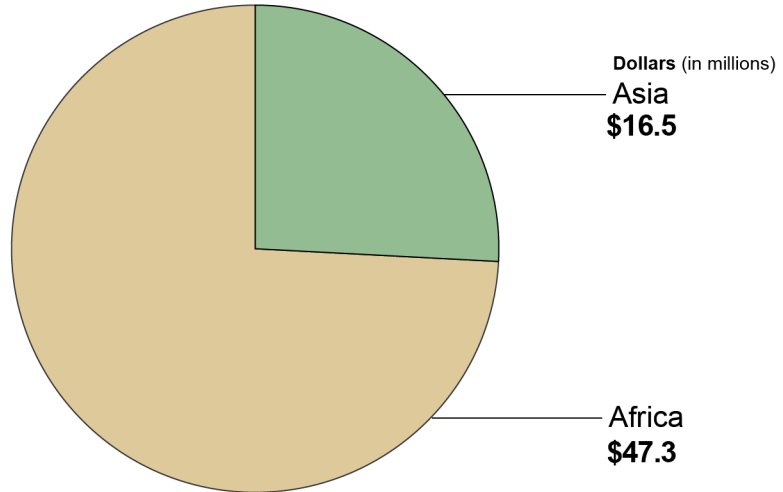


Source: GAO (photos). | GAO-24-106553.

For fiscal years 2020 to 2022, USAID allocated an estimated \$64 million, and State and FWS obligated an estimated \$26 million and estimated \$7 million, respectively, for ranger activities in Africa and Asia (see figures 4, 5, and 6).²²

²²Funding generally represents estimates because agencies do not readily track funding specifically for ranger activities, and because of differences in how agencies defined ranger activities. For additional information on how the agencies compiled estimated allocations and obligations, see appendix I on our objectives, scope, and methodology.

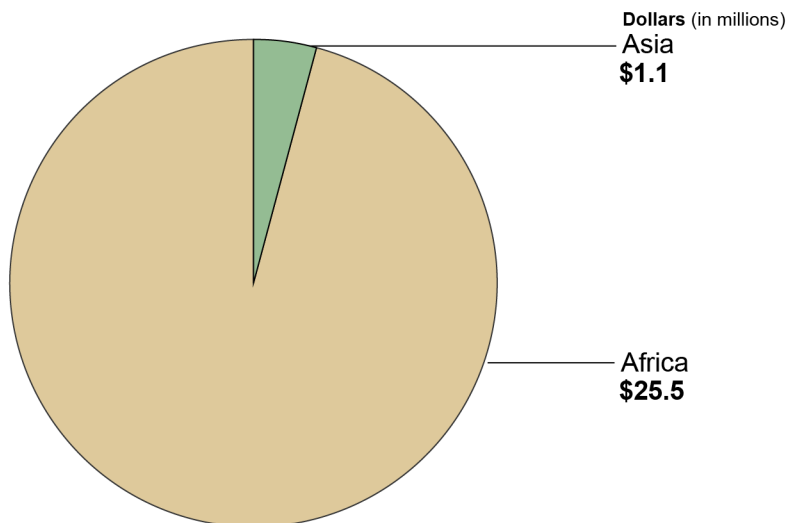
Figure 4: USAID Estimated Allocations for Ranger Activities in Africa and Asia, Fiscal Years 2020-2022



Source: GAO analysis of U.S. Agency for International Development (USAID) data. | GAO-24-106553

Note: Totals may not add up due to rounding.

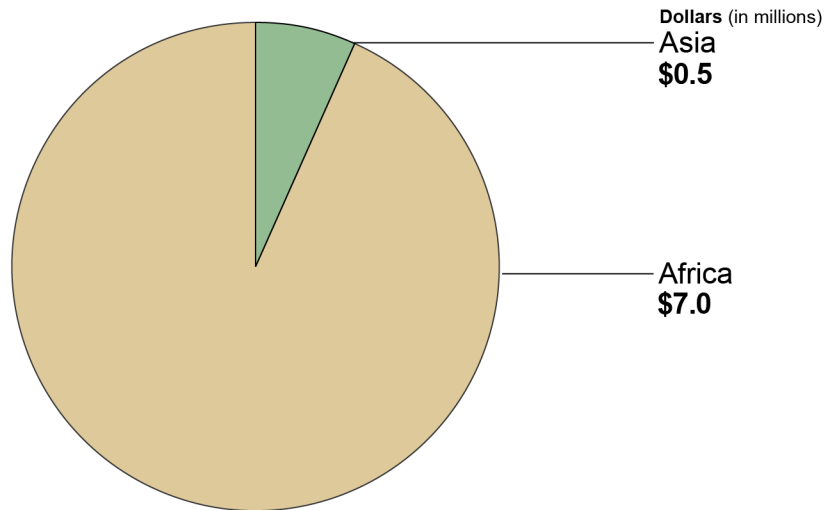
Figure 5: Department of State Estimated Obligations for Ranger Activities in Africa and Asia, Fiscal Years 2020-2022



Source: GAO analysis of Department of State data. | GAO-24-106553

Note: Totals may not add up due to rounding.

Figure 6: U.S. Fish and Wildlife Service Estimated Obligations for Ranger Activities in Africa and Asia, Fiscal Years 2020-2022



Source: GAO analysis of U.S. Fish and Wildlife Service data. | GAO-24-106553

Note: Totals may not add up due to rounding.

Appendix II provides additional information and data on USAID, FWS, and State/INL support for ranger activities in Africa and Asia in fiscal years 2020 to 2022.

Agencies Took Steps to Enhance Human Rights Protection Mechanisms for Ranger Activities since 2020

USAID Published Guidance on Social Safeguards for Activities in Parks and Protected Areas

Since 2020, USAID has published guidance on social safeguards to protect human rights for activities, including ranger activities, in parks and

protected areas.²³ In particular, USAID published guidance on its website for implementing partners that addresses the four social safeguards: (1) community consultation and engagement, (2) consideration of Indigenous Peoples and FPIC principles, (3) human rights training for rangers, and (4) GRM (see table 1). The website states that USAID began incorporating safeguard requirements into the environmental compliance process for both new and existing awards for activities supporting parks and protected areas.

Table 1: Examples of U.S. Agency for International Development (USAID) Guidance on Social Safeguards for Activities in Parks and Protected Areas

Guidance	Date Published
<i>Community consultation and engagement</i>	
Community Engagement Guide	March 2022
Community Engagement for USAID Protected Area Activities: How-to Guide	March 2022
<i>Consideration of Indigenous Peoples and Free, Prior, and Informed Consent principles</i>	
USAID Policy on Promoting the Rights of Indigenous Peoples (PRO-IP)	March 2020
Optional Toolkit on Identifying Indigenous Peoples	December 2021
USAID Guidance on Monitoring Free, Prior, and Informed Consent (FPIC)	December 2021
The Concise Guide for Monitoring Engagement and Verifying Free, Prior, and Informed Consent (FPIC) ^a	December 2021
<i>Human rights training for rangers</i>	
Training and Monitoring Best Practice Monitoring Guide: Rights-Based Training for Rangers in National Parks and other Protected Areas	March 2022
<i>Grievance and Redress Mechanisms</i>	
Grievance and Redress Mechanism for USAID Protected Areas Activities: Guidelines and Principles for Design and Integration	March 2022

Source: GAO summary of USAID documentary and testimonial evidence. | GAO-24-106553

Note: USAID guidance for staff and implementing partners on safeguards for activities supporting parks and protected areas is published on USAID's website at <https://www.usaid.gov/environmental-procedures/environmental-compliance-esdm-program-cycle/safeguards-for-activities-supporting-parks-and-protected-areas>. Accessed Mar. 18, 2024.

^aThe Concise Guide to USAID's Toolkit for Monitoring Engagement and Verifying Free, Prior, and Informed Consent (FPIC) serves as a resource guide for those using USAID's FPIC-360° Tool, which is an interactive USAID framework for understanding, implementing, and verifying the FPIC process. For more information, see www.usaid.gov/document/fpic-360-monitoring-tool. Accessed Mar. 18, 2024.

²³According to USAID guidance and International Union for Conservation of Nature standards, USAID interprets the following six park categorizations as protected areas: strict nature reserves and wilderness areas; national parks; national monuments or features; habitat specific management areas; protected landscapes and seascapes; and protected areas with sustainable use of nature resources. USAID officials noted that USAID also considers community conservation areas and community forest management areas in its definition of protected areas.

USAID's *Policy on Promoting the Rights of Indigenous Peoples*, for example, provides USAID Operating Units with criteria and guidance for the following five operating principles: identifying Indigenous Peoples, analyzing Indigenous Peoples' opportunities and challenges, engaging with Indigenous Peoples, safeguarding their rights and well-being, and establishing partnerships with them. The policy includes recommendations for conducting meaningful consultation and obtaining FPIC, such as communicating with stakeholders early and often throughout a project and consulting with a diversity of stakeholders, including women, youth, and persons with disabilities.

In addition, USAID's *Grievance and Redress Mechanism for USAID Protected Areas Activities: Guidelines and Principles for Design and Integration* states that GRM can build trust, which can ultimately lead to more effective programming and implementation. The guidance adds that GRM can help USAID and its partners better understand how the impacts of their programs are perceived and felt locally and how to address them in the appropriate manner for the local context. It summarizes USAID's expectations regarding GRM; lays out an approach for partners to put GRM in place; outlines mitigation, resolution, and monitoring procedures for GRM; and delineates roles for USAID and partners related to GRM.

USAID officials noted that some USAID missions began incorporating social safeguards into awards in response to congressional directives in early 2020, prior to when USAID published some of the guidance. According to USAID officials, USAID also continues to require and apply Leahy vetting for all awards that include proposed assistance to security forces. The officials added that USAID missions provide guidance to partners and monitor their work plans to ensure that the agency conducts Leahy vetting for planned activities that include relevant training or other support for law enforcement personnel.

FWS Took Steps to Provide for More Oversight and Accountability and to Consider Human Rights Risks for Its Awards

FWS provides funding for combating wildlife trafficking awards from two sources, according to agency officials—funding from USAID through

interagency awards and direct appropriations to FWS.²⁴ Since 2020, FWS and USAID have shifted the funding that FWS receives from USAID for awards with ranger activities to a different type of interagency agreement mechanism as part of an effort to provide for greater oversight and accountability of those funds in accordance with USAID terms and conditions. For FWS's direct-funded awards (awards from funds directly appropriated to FWS), FWS has developed a pilot risk assessment related to social safeguards.

According to FWS and USAID officials, as of July 2023, all FWS awards—including those with ranger activities—funded by interagency agreement with USAID have shifted from transfers authorized under 632(a) of the Foreign Assistance Act to agreements under 632(b) of the Act. The officials noted that this means USAID terms and conditions, including for any social safeguards to protect human rights, now generally apply for those award funds.²⁵ According to USAID's Automated Directives System (ADS), under a 632(a) transfer, the recipient agency has financial and programmatic accountability for the funds. Under a 632(b) agreement, USAID is accountable for the funds and must provide the necessary oversight and coordination for the services or program it finances. Previously, when the awards were provided through 632(a) transfers, FWS was responsible for financial and programmatic accountability over those funds.²⁶ A September 2020 Department of the Interior internal memorandum indicated that the purpose of this shift in the type of mechanism used for the interagency agreement funds was to provide USAID with greater oversight and accountability of funds, given concerns at the time about inadequate monitoring and oversight controls within FWS.

For FWS awards funded directly through its appropriations, FWS developed a pilot to assess the risk of the "abuse of power" for its direct-funded awards for activities in Africa, according to FWS officials. Officials

²⁴According to USAID's Automated Directives System (ADS), which contains agency-wide policies and procedures for internal control as well as for making awards to NGOs, USAID may enter into agreements with other U.S. government agencies to carry out functions under the Foreign Assistance Act of 1961, as amended. See ADS ch. 306, *Interagency Agreements*.

²⁵We previously reported that under 632(b), USAID retains greater control over how it uses and accounts for funds. See GAO, *Former Soviet Union: An Update on Coordination of U.S. Assistance and Economic Cooperation Programs*, [GAO/NSIAD-96-16](#) (Washington, D.C.: December 1995).

²⁶See ADS ch. 306, *Interagency Agreements*.

stated they developed the pilot in response to the 2020 congressional committee report directives on safeguarding human rights. According to officials, the pilot encompassed all FWS's awards in Africa, including those with ranger activities which could involve risks related to the abuse of power, such as a potential for corruption, human rights violations, or restrictions on access rights that could impact project activities. For awards that are part of the pilot, a FWS program officer completes a risk assessment template based on award proposal materials submitted by applicants. The risk assessment template includes questions for FWS officials to consider regarding the four social safeguards for different risk categories, such as geopolitical factors and the level of engagement with local communities and Indigenous Peoples.²⁷

We previously reported that Leahy vetting applies for FWS awards funded through USAID interagency agreements authorized under the Foreign Assistance Act, but the vetting does not apply to funds directly appropriated to FWS, as those funds are not used to provide assistance under the Foreign Assistance Act.²⁸ FWS officials told us that FWS is developing an Memorandum of Understanding (MOU) with State's Bureau of Democracy, Human Rights, and Labor to establish a mechanism similar to Leahy vetting for its direct-funded awards. Under the draft agreement, State would create a new module in its human rights vetting system, which would flag derogatory information to share with FWS.

State Began Adding Language on Social Safeguards to Notices of Funding Opportunities for Applicants for Awards with Ranger Activities

In 2020, State/INL began adding language to Notices of Funding Opportunities (NOFOs) for countering wildlife trafficking awards that stated implementing partners should address potential project human rights impacts on local communities and provide social safeguards plans with their applications.²⁹ State/INL officials told us that INL began including the language for applicants to provide social safeguards plans in response to the 2020 congressional directives. Specifically, INL added language to combating wildlife trafficking NOFOs that proposals must

²⁷The risk assessment also includes other types of risks, such as the risk of potential disease transmission and any applicant history of non-financial misconduct.

²⁸[GAO-21-139R](#).

²⁹According to State officials, the department's Office of the Procurement Executive, which provides management direction and leadership over department-wide acquisition and federal assistance policies, does not currently mandate or require social safeguard plans for any federal assistance programs awarded by State. The requirement for a social safeguards plan is included in NOFOs contingent upon the needs of proposed projects or programs.

articulate an understanding of how the work outlined in a proposal could negatively impact local communities, including human rights considerations, if relevant. Applicants should provide a detailed social safeguards plan within their risk analysis that clearly outlines the social risks and measures they will put in place to mitigate those risks. It is incumbent upon the applicants to write a social safeguards plan tailored to their organization and proposed program.

According to State officials, State continues to conduct Leahy vetting for park rangers, who the agency views as units operating as part of a foreign security force—authorized to use force, search, detain, or arrest. State has updated guidance for Leahy vetting teams since 2020, including a July 2021 State cable which provided guidance on equipment vetting, and a September 2022 State bulletin which set up a new requirement to vet security force units and individuals receiving applicable assistance for credible allegations of sexual exploitation or abuse.³⁰ For fiscal years 2020 to 2022, State reported vetting 6,993 park rangers and ecoguards in Africa and South and Central Asia. In addition, State officials told us that State is completing the interagency clearance and approval process to publish an updated Leahy Vetting Guide in 2024.³¹ When complete, the guide will be a comprehensive Joint State-Department of Defense publication providing guidance to officers from both agencies involved in the Leahy vetting process at overseas posts and in Washington, D.C.

³⁰According to State officials, this vetting of security forces requires that assistance for fiscal years 2022 and 2023 should be withheld from responsible units, consistent with the Leahy Vetting Guide, when there is credible information that the unit engaged in sexual exploitation or abuse, absent equally credible contrary information. For more information, see Pub. L. No. 117-103, Div. K, § 7048(g), 136 Stat. 664 and Pub. L. No. 117-328, Div. K, § 7048(g), 136 Stat. 5072.

³¹This guide will be an update to State's 2017 Leahy Vetting Guide. Department of State, Bureau of Democracy, Human Rights, and Labor, *Leahy Vetting Guide—A Guide to Implementation and Best Practices* (2017).

Agencies Took Steps to Ensure Partners Planned Appropriate Safeguards to Protect Human Rights for Selected Awards, but Gaps Remain

USAID, FWS, and State have taken steps to ensure partners plan for social safeguards to protect human rights in ranger activities for selected awards, but their efforts have weaknesses that could present human rights abuse risks for projects.³² Specifically, while USAID required implementing partners to provide plans for social safeguards, it did not ensure timely completion of the plans. In addition, FWS conducts a risk assessment addressing human rights risks and social safeguards for applicants for awards with ranger activities under its “abuse of power” pilot. However, FWS has not communicated guidance for applicants to provide quality, timely information to FWS regarding human rights abuse risks related to the project and any planned social safeguard mechanisms to address those risks. Moreover, while State/INL’s NOFOs for combating wildlife trafficking state that applicants should provide social safeguards plans, INL has not developed guidance for internal application reviewers regarding their review of the plans, including the human rights risks or social safeguard mechanisms they should consider in their proposal reviews.

USAID Required Partners to Provide Plans to Protect Human Rights but Did Not Ensure They Completed Them in a Timely Manner

USAID required partners to provide plans addressing social safeguards to protect human rights—including community consultation and engagement; consideration of Indigenous Peoples and FPIC principles, if applicable; human rights training for rangers; and GRM. However, USAID did not ensure timely completion of the plans based on the timeframes USAID set for the awards. This raises the risk that USAID does not have sufficient, timely information to determine if its partners have planned appropriate human rights safeguards. Federal internal control standards state that management should design appropriate types of control activities to achieve objectives and respond to risks, and that common activities include comparisons of actual performance to plans.³³ They also state that management should use quality information that is appropriate, current, complete, accurate, accessible, and provided on a timely basis.³⁴

For our seven selected USAID awards, USAID generally incorporated requirements for partners to provide social safeguards plans into the

³²We reviewed a judgmental sample of 19 USAID, FWS, and State awards, which included seven USAID awards, six FWS awards, and six State awards. See appendix I for additional information on our objectives, scope, and methodology, including a table with additional information on our selected awards for each agency.

³³GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014).

³⁴[GAO-14-704G](#).

Initial Environmental Examination (IEE), or an IEE amendment, between April 2021 and September 2022.³⁵ According to USAID officials, in addition to assessing environmental impacts, IEEs may incorporate an assessment of social impacts, and USAID requires an IEE for all USAID awards with ranger activities. Officials added that requirements in IEEs, which are completed by missions and may encompass multiple awards, are considered part of the award. For three of the seven selected USAID awards, USAID also incorporated language on the required social safeguards plans into the award agreement or a modified contract between September 2022 and August 2023.

We found that USAID established timeframes for partners to provide the required social safeguards plans for our selected USAID awards. Specifically, the IEE applicable to three of the awards, and the agreement for a fourth award, included timeframes for partners to provide the plans within 60 days.³⁶ The IEEs for two awards stated that partners should address planned social safeguards as part of the partners' Environmental Mitigation and Monitoring Plans (EMMP), which were due in approximately 4 to 5 months. USAID determined that the requirement was not applicable for the seventh award.³⁷

Although we found that partners for our selected USAID awards generally provided the required social safeguards plans, we identified timeliness issues for four of the awards.³⁸ Specifically, partners for four of the

³⁵According to USAID's IEE Template Version 4.0-2023, the purpose of an IEE is to review reasonably foreseeable effects of a proposed action on the environment, in accordance with 22 C.F.R. § 216. The IEE sets out conditions necessary to mitigate or eliminate significant adverse impacts. The template states that the conditions in the IEE become mandatory upon approval. The IEEs for our selected USAID awards generally required partners to document plans for addressing the four social safeguard conditions identified in the IEEs in an Environmental Mitigation and Monitoring Plan (EMMP) or a "social safeguards implementation plan draft and impact assessment." We refer to these documents as social safeguards plans for this report.

³⁶The Sept. 13, 2022, award agreement for one of these selected awards also included a deadline for the partner to provide a social safeguards plan by Oct. 2023. This award, for the World Wildlife Fund (WWF) in the DRC, was co-designed with USAID and focuses in part on the development and implementation of social safeguards for activities in Salonga National Park.

³⁷USAID determined that the requirement was not applicable for one of these awards, which was ongoing, although the requirement applied to a follow-on award to the same partner, the Jane Goodall Institute in Tanzania (also in our sample).

³⁸Partners for two awards provided social safeguards plans in accordance with USAID's established timeframes in the award agreements for those awards. See table 2 for more information on these awards.

awards provided plans about 6 to 21 months after the established deadlines. For the partner that did not provide a plan for 21 months, partner officials told us in July 2023 that they did not understand the plan was required, and the mission had only strongly encouraged them to prepare one. The partner provided an initial draft plan in June 2023.³⁹ In July 2023, a Village Forest Guard, who had received support and training from a subpartner under the award, shot and killed an unarmed pastoralist while on patrol with government rangers in a community forest reserve area, according to agency, partner, and subpartner officials.⁴⁰ During our site visit at this location in August 2023, subpartner officials we met with told us that the shooting incident heightened their awareness of the importance of human rights social safeguard mechanisms, and they are now planning to give greater attention to ensuring they have incorporated appropriate mechanisms into their project activities. The partner subsequently finalized the June 2023 draft social safeguards plan in October 2023.

³⁹This award for Research Triangle Institute, International (RTI) for activities in Tanzania, began in June 2021. The Apr. 2021 IEE for the award had a requirement for the partner to provide an EMMP addressing the four social safeguards, and RTI's contract required RTI to provide an initial EMMP in Sept. 2021. The USAID mission shared documentation with us from the mission's Mar. and Dec. 2022 meetings with RTI and other partners. This included guidance on the four social safeguards, discussion of USAID's social safeguard requirements, and a statement that EMMPs should address those requirements. RTI officials told us they provided a separate draft social safeguards plan to USAID officials in June 2023 after the USAID mission "strongly encouraged" them to compile a plan. USAID shared the partner's final plan, dated Oct. 27, 2023, with us. In Apr. 2024, USAID mission officials noted they were amending the IEE for natural resource management awards in Tanzania to clarify the requirement for partners to provide a social safeguards plan.

⁴⁰According to subpartner officials, the pastoralist shooting incident occurred when a group of Village Forest Guards went on an anti-poaching patrol with District Game Officers in a Joint Village Land Forest Reserve. Subpartner officials and community members with whom we met during our visit at this location noted that grazing livestock is prohibited within the reserve, but they have had issues with pastoralists who are not part of the local village structure, do not speak the local language, and may be unaware of the rules accessing prohibited lands. In this case, District Game Officers provided weapons to the Village Forest Guards, who had not received adequate law enforcement training for the use of weapons, according to subpartner officials. The situation quickly became combative when the anti-poaching patrol encountered the unarmed pastoralists, and a Village Forest Guard, who felt threatened, fired a warning shot and then another shot that hit a pastoralist in the leg. The pastoralist subsequently died of his injuries. During our site visit, the Tanzanian government was holding the guard while it investigated the incident. Subpartner officials told us they are designing a study to determine how to improve social safeguards for pastoralist groups that are not part of Tanzania's community consultation or GRM processes.

Table 2 provides additional details on USAID’s established requirements and timeframes for social safeguards plans for our selected awards, including the timeliness issues we identified for four awards.

Table 2: USAID Social Safeguards Plan Requirements and Timeframes for Selected Awards

Partner	Country	Plan provided timely?	Award start date	Date USAID established requirement	Any specified timeframe for providing plan	Date plan provided
WWF	DRC	Yes ^a	Sept. 2022	Sept. 2022	Oct. 2023	Feb. 2023
JGI	Tanzania	Yes ^b	Aug. 2023	Aug. 2023	60 days, extended to Dec.	Dec. 2023
African Parks Network	DRC & CAR	No ^c	Sept. 2016	Sept. 2022	60 days	May 2023 (DRC) June 2023 (CAR)
WCS	DRC	No	Sept. 2020	Sept. 2022	60 days	May 2023
VF	DRC	No	July 2019	Apr. 2022	Aug. 2022	Apr. 2023
RTI	Tanzania	No ^d	June 2021	Apr. 2021	Sept. 2021	June 2023
JGI	Tanzania	N/A ^e	Nov. 2018	N/A	N/A	N/A

Legend: WWF = World Wildlife Fund; DRC = Democratic Republic of the Congo; JGI = Jane Goodall Institute; CAR = Central African Republic; WCS = Wildlife Conservation Society; VF = Virunga Foundation; RTI = Research Triangle Institute, International; N/A = not applicable.

Source: GAO analysis of award documentation from our judgmental sample of U.S. Agency for International Development (USAID) awards with ranger activities. | GAO-24-106553

Note: USAID generally incorporated requirements for partners to provide plans addressing social safeguards into the Initial Environmental Examination (IEE), or an IEE amendment, for our seven selected USAID awards. IEEs may cover one or multiple awards, according to USAID officials. For three of the seven selected USAID awards, USAID also incorporated language on the required social safeguards plan into the award agreement or a modified contract.

^aAccording to WWF officials, project implementation on site did not begin until Feb. 2023. In addition, this award focuses in part on the development and implementation of social safeguards for activities in Salonga National Park, DRC, and activities for the award were co-designed with USAID. Award proposal documentation included an overview of project risks and described mitigation measures planned related to social safeguards.

^bAccording to USAID officials, the mission extended the deadline to December at the partner’s request because of a delayed start for project activities.

^cThe selected African Parks Network award included activities in two locations—Garamba National Park in the DRC and Chinko Conservation Area in CAR.

^dThe April 2021 IEE for the selected RTI award included a social safeguards plan requirement for the partner to provide an EMMP addressing the four social safeguards, and RTI’s contract required RTI to provide an initial EMMP in Sept. 2021. RTI provided a draft plan to USAID in June 2023. RTI finalized the draft plan in Oct. 2023.

^eThe requirement for a social safeguards plan was not applicable to the Nov. 2018, JGI award; the Apr. 2021 IEE for the award instructed partners for ongoing awards to consult with the mission on whether social safeguard requirements would apply. JGI provided a plan in a timely manner for the subsequent award in our sample, which began in Aug. 2023, as noted above.

Given the timeliness issues we identified, USAID cannot be assured it has the information it needs to make informed decisions in a timely manner for each award regarding whether partners have incorporated

appropriate social safeguard mechanisms to address risks and achieve objectives to protect human rights. Moreover, USAID lacks assurance that partners have appropriate safeguards in place for activities they may have already begun implementing, raising the risk that potential human rights abuses—such as the pastoralist shooting death described above—could occur in locations which the agency supports.

According to USAID officials, as of April 2024, USAID aims to include requirements and guidance on what partners should include for project social safeguards to protect human rights in both the IEE and the award agreement. They added that USAID was initially unable to include the social safeguard conditions in the award agreements for ongoing awards when the agency started incorporating requirements into the awards. USAID was phasing this process into ongoing and new awards, and now plans to add the language into agreements for new awards. However, USAID officials added that the specific language to include in an IEE and award agreement are ultimately determined based on the preferences of the mission. As a result, language regarding a social safeguards plan and any timeframe for providing it may vary or not be part of every award agreement.

We identified timeliness issues for four of our selected USAID awards, raising questions about whether USAID has taken sufficient steps to ensure that each of its partners for awards with ranger activities understands and adheres to the requirements to provide these plans in a timely manner. Such steps could include communicating with partners to ensure they are aware of and understand the requirement; providing appropriate guidance, as needed; and following up on the status of partners' plans. Without taking steps to ensure that partners provide the required social safeguards plan in a timely manner, in accordance with USAID's established deadlines, USAID lacks assurance that it has the timely information it needs to determine whether its partners have designed appropriate social safeguard mechanisms which could help reduce the risk that human rights abuses occur on USAID-funded projects.

FWS Did Not Give Clear Guidance for Partners for Its Awards to Provide Quality, Timely Information on Human Rights Risks and Social Safeguards

We found that USAID’s terms and conditions for providing information on social safeguards were incorporated in our four selected FWS awards with ranger activities funded by USAID interagency agreement. However, we found that FWS did not communicate guidance for our two selected FWS direct-funded awards with ranger activities on providing quality, timely information to the agency on social risks, including the risk that human rights abuses could occur in projects, and planned social safeguards to address those risks. As a result, FWS did not have assurance that applicants would provide—or would know to provide—timely information on planned social safeguards, to inform the risk assessments that FWS conducts under its “abuse of power” pilot. FWS could use such information to make informed decisions regarding whether its partners have appropriately designed their social safeguard mechanisms to address risks and protect human rights.

We found that for two of our four selected FWS awards funded by USAID interagency agreement, partners provided social safeguards plans in a timely manner, in accordance with USAID terms and conditions incorporated into the awards. USAID and FWS determined that the requirement for a social safeguards plan did not apply to the other two FWS awards funded by USAID interagency agreement, because one was nearly complete when USAID established the requirement, and the other had a narrow scope focused on human rights training.

- For FWS’s award to Wildlife Conservation Society (WCS) for activities in Kahuzi-Biega National Park and the proposed Oku Reserve in the DRC, USAID established a requirement for the partner to provide a social safeguards plan in an IEE for the award, and an award modification required the plan to be provided within 90 days.⁴¹ The partner provided a draft plan on September 10, 2021 (prior to the

⁴¹The IEE for this award, approved May 17, 2021, did not include a timeframe for the partner to provide the required social safeguards plan. The award was modified following a shift to a USAID 632(b) interagency agreement on Sept. 20, 2021, and the modification included a deadline for the plan to be provided within 90 days.

modification date), which stated that all four social safeguards applied for the project. USAID approved the plan on September 8, 2022.⁴²

- For FWS’s award to WCS for activities in Nouabalé-Ndoki National Park in the Republic of the Congo, modified following a shift to a USAID 632(b) interagency agreement on March 14, 2023, USAID established a requirement for the partner to provide a social safeguards plan in an IEE that included a timeframe for the partner to provide the plan within 60 days. The partner provided the plan at the time of the modification in March 2023, which addressed social safeguards, including community consultation and FPIC in and around Nouabalé-Ndoki National Park, human rights training for rangers and ecoguards, and GRM.⁴³
- Partners for the other two FWS awards funded by USAID interagency agreement, both supporting the national parks service in Gabon, did

⁴²This award, which ran from Nov. 2018 to June 2024, initially included ranger activities. However, according to FWS officials, no funding was permitted for ranger activities in 2018 to 2019 due to Trafficking Victims Protection Act restrictions that applied to assistance funding for the DRC government (which applied to officials including rangers). See Pub. L. No. 106-386, Div. A, 114. Stat. 1466 (Oct. 28, 2000) classified principally to 22 U.S.C. § 7101 et seq. The Act was reauthorized as the William Wilberforce Trafficking Victims Protection Act of 2008, Pub. L. No. 110-457, 122 Stat. 5044 (Dec. 23, 2008). According to USAID and FWS officials, the USAID mission subsequently reached a decision—which also applied to the interagency agreement funds—not to fund DRC government activities in Kahuzi-Biega National Park until the WCS and the DRC government’s National Protected Area Agency signed a public-private partnership agreement for the park’s management, which they signed in Apr. 2022. While FWS did not later modify the award to include ranger activities, according to FWS officials, award activities focused on social safeguards for the proposed Oku Reserve, including community consultation, FPIC, and GRM. According to WCS officials, WCS provided limited support for rangers while it was negotiating the management agreement with the Agency, including human rights training, health and literacy assessments, and rations.

⁴³WWF was originally the primary partner for this award, and WCS was a subaward recipient for activities that included ranger activities at Nouabalé-Ndoki National Park. FWS modified the award and made WCS the primary partner in Jan. 2021, with Jan. 2025 as the planned award end date. WCS provided a revised proposal for the modified award that removed ranger activities and incorporated additional project safeguards to protect human rights, including GRM. Following the modification to 632(b) interagency agreement in Mar. 2023, WCS reintroduced plans for ranger activities. According to WCS officials, as of Dec. 2023, they had not begun the ranger activities because of delays in vetting.

not provide social safeguards plans.⁴⁴ For one of those two awards, provided to Gabon’s National Agency for National Parks (ANPN), USAID officials explained USAID did not incorporate a requirement for a plan into the Central Africa Regional Program for the Environment IEE until September 2022, when activities for this award were close to completion.⁴⁵ For the other award, USAID and FWS officials said they did not require a plan because that award focused entirely on developing a training curriculum, including on human rights, for the parks service.

For our two selected FWS direct-funded awards, we found that FWS did not communicate guidance for award applicants to provide quality, timely information to the agency regarding social risks, including human rights abuse risks related to the project, and any planned social safeguards to protect human rights. NOFOs for our two selected FWS direct-funded awards included general questions for applicants about whom the project will affect and how it will incorporate stakeholders. FWS officials noted that FWS added those questions to the NOFOs for its pilot risk assessment. However, we found the NOFOs did not request information from applicants on project human rights abuse risks and other social risks that FWS evaluates as part of its risk assessment. The NOFOs also did not request information from applicants on any planned social safeguards to address risks.

Under its “abuse of power” pilot, FWS conducts a risk assessment for award applications in the early stages for its awards.⁴⁶ FWS’s internal

⁴⁴One of these awards was provided to Gabon’s National Agency for National Parks (ANPN) and the other to WCS. According to USAID officials, the agencies consider ANPN to be a commercial parastatal organization under the definition in USAID’s ADS 302.3.3(a). See ADS ch. 302, *USAID Direct Contracting*. For example, USAID officials noted that ANPN maintains its own revenue streams and is set up to be profit-generating. FWS officials added that the ANPN had a unique bank account dedicated only to the FWS award funds. The ANPN award, which ran from Aug. 2013 to May 2023, supported national parks throughout Gabon and included ranger activities. The WCS award, which began in Oct. 2019 has a Jan. 2026 end date, focuses on development and implementation of a training curriculum for rangers, including human rights. According to FWS officials, as of Nov. 2023, FWS was re-evaluating future awards for activities in Gabon given the Aug. 2023 coup in Gabon. According to a State press release of Oct. 23, 2023, the U.S. suspended most U.S. assistance to the government of Gabon due to the military coup, pursuant to section 7008 of State’s annual appropriations act.

⁴⁵Although USAID did not require a social safeguards plan for this award, USAID and FWS officials noted that FWS communicated with ANPN by email in Aug. 2021 regarding its planned project social safeguards.

⁴⁶According to FWS’s guidance, FWS generally conducts this assessment after it has reviewed and recommended a proposal for funding.

guidance for reviewers conducting the risk assessment includes questions for FWS officials to consider regarding social safeguards, including community consultation and engagement, consideration of Indigenous Peoples and FPIC, human rights training for rangers, and GRM. It states that if applicants do not clearly address the questions in their proposals, FWS officials are advised to follow-up with applicants for clarification. In addition, depending on the risk level, the assessment includes actions and mitigation measures for FWS to verify regarding the applicant's plans for the four social safeguards.

The proposal for one of our two FWS direct-funded awards, for the Southern Tanzania Elephant Program (STEP), provided information on planned community consultation and engagement but did not address other planned social safeguards. We gathered testimonial and documentary information during our field work from STEP on its social safeguards, including community consultation and engagement, FPIC process, human-rights training, and GRM. However, FWS did not follow-up with STEP for additional information on project social risks and any planned safeguards before FWS completed its risk assessment.⁴⁷ As a result, FWS did not have adequate information from STEP to inform FWS's assessment of human rights and other social risks and any planned safeguards for the project. While it is helpful that FWS guidance advises its reviewing officials to follow up for clarification on project social risks and any planned social safeguards, also providing guidance to applicants on the information they need to provide with their applications on social risks and safeguards would offer greater assurance that FWS reviewers have the information they need, in a timely manner, to assess the proposals.

The proposal for the other FWS direct-funded award, for the Frankfurt Zoological Society (FZS) in Tanzania, contained some information related

⁴⁷FWS's risk assessment for STEP identified governance as a medium risk category. For this risk level, the rating action states that FWS should verify the applicant has measures in place to reduce risk for the potential abuse of power, including safeguards such as community consultation, codes of conduct, training protocol, and grievance mechanisms. However, FWS recommended proceeding with the award without taking any additional steps to follow-up with the applicant or to verify the applicant's social safeguards, because of, according to FWS's assessment, STEP's long-standing relationship and MOU with the Tanzanian Wildlife Management Authority. STEP's proposal included a copy of the MOU, which documented the Authority's agreement to partner with STEP on projects addressing human-elephant conflict in local communities, and to provide equipment and capacity building for ranger patrols. Nevertheless, the sections of the MOU that STEP included in the proposal relevant to the project do not specifically address project social safeguards to protect human rights.

to planned social safeguards, such as identifying a need for more ranger training related to social safeguards, including grievance mechanisms. However, it did not address community consultation and engagement or FPIC. The proposal also did not provide details on whether FZS had already established, or was planning to establish, grievance mechanisms for the project. FWS's risk assessment of FZS, dated September 8, 2021, identified three medium-risk categories. While FWS followed up with FZS about its planned social safeguards and received information from it in November 2021—after the award was issued—on its plans for community consultation and engagement, and mitigation measures for rangers and staff on code of conduct and training. It is unclear, however, that FWS obtained sufficient information from FZS in a timely manner to inform the risk assessment that FWS completed prior to providing the award to FZS.

According to FWS officials, FWS has hired staff to develop social safeguard policies and procedures and due diligence review processes, including proactively integrating social safeguard practices into project designs and proposals. However, the social scientist primarily responsible for this effort had recently started as of November 2023. FWS officials told us that the pilot risk assessment conducted for our two selected direct-funded awards was a first iteration and as of April 2024, FWS was working on creating more guidance for FWS officials and partners for performing risk evaluation, including appropriate social safeguard mitigation measures to address human rights abuse risks.

Federal internal control standards state that management should identify, analyze, and respond to risks, and design appropriate types of control activities to achieve objectives and respond to risks. Management should externally communicate the necessary quality information to achieve the entity's objectives. It should also use quality information that is appropriate, current, complete, accurate, accessible, and provided on a timely basis.⁴⁸ Without communicating clear guidance for award applicants with ranger activities about what kind of information to provide to FWS regarding project social risks and planned safeguards, FWS risks not having quality, timely information from applicants prior to completing its risk assessments. Moreover, FWS risks making award decisions without having the information it needs to determine whether applicants have appropriate safeguards in place to prevent human rights abuses from occurring in projects.

⁴⁸[GAO-14-704G](#).

State Has Not Developed Internal Guidance for Application Reviewers Regarding Social Safeguards Plans to Protect Human Rights

Since 2020, State/INL included language in NOFOs for our selected awards requiring applicants for awards to provide social safeguards plans. INL has not, however, developed guidance for internal application reviewers regarding their review of applicants' plans, including human rights abuse risks or social safeguard mechanisms they should consider in their proposal reviews. Federal internal control standards state that management should identify, analyze, and respond to risks. Management should internally communicate the necessary quality information to achieve the entity's objectives. It should also communicate quality information down and across reporting lines to enable personnel to perform key roles in achieving objectives, addressing risks, and supporting the internal control system.⁴⁹

According to State officials, Technical Evaluation Panels (TEP) generally review and score applications, including applicants' assessments of any social risks related to project activities and social safeguards plans, before making award decisions.⁵⁰ NOFOs for the four of our six selected State awards that were dated 2020 or later included language stating that applicants should provide a social safeguards plan, which the partners for these four awards provided with their applications.⁵¹ However, according

⁴⁹[GAO-14-704G](#).

⁵⁰State officials added that applications for open and limited source competitions are always scored by voting members of a TEP. The decision to require a TEP for sole sourced applications is at the discretion of the Grants Officer.

⁵¹The four selected State awards with NOFOs dated 2020 or later were provided to African Parks Network for activities at parks and protected areas in Benin, Chad, Malawi, the Republic of the Congo, and Zambia; Virunga Foundation for activities in Virunga National Park in the DRC; WCS for activities in parks and protected areas in the DRC and the Republic of the Congo; and WCS for activities in the Rungwa and Rukwa regions in Tanzania. The NOFOs for the other two selected State awards pre-dated the requirement for a social safeguards plan. One of these awards was for African Parks Network for activities in Garamba National Park in the DRC, for the period from Oct. 2019 to Sept. 2024. The other award was for STEP in Tanzania from May 2020 to Sept. 2024.

to State/INL officials, INL does not have internal guidance for reviewers regarding human rights social safeguards.⁵²

We found that TEP review documentation, including score sheets and decision memos, for three of the four awards generally did not address social risks or safeguards. As a result, it is unclear whether or how State reviewed and evaluated the applicants' social safeguards plans as part of the TEP review process. INL did not require a TEP review for the fourth award—for the Virunga Foundation for activities at Virunga National Park in the DRC—because no other partners were eligible for the award and their internal policy encourages, but does not require, a TEP review to be conducted for sole-source solicitations. The selection memo for the Virunga Foundation award stated that INL officials reviewed the proposal for technical and programmatic requirements and determined it adequately responded to the NOFO contingent on certain conditions, such as for the applicant to provide a budget in the correct format. However, the memo did not address human rights abuse risks or planned safeguards to address those risks.

State/INL officials said that State selects members of TEP review panels based on their experience and professional qualifications, as well as diversity factors, such as representing different agencies. They stated that the panels review social safeguards plans prior to making an award and would document recommendations or establish conditions if a plan were inadequate. However, without providing internal guidance on the social safeguards its reviewers are to consider in assessing applicants' plans, State does not have assurance its reviewers have the quality information they need to assess whether applicants have incorporated appropriate plans for safeguards to protect human rights in projects. Such guidance could also ensure the reviewers understand, for example, that they should clearly document their assessment of social safeguards and any

⁵²State officials noted that NOFOs include instructions for reviewers for scoring applications. We found that NOFOs for the four selected State awards generally included broader instructions for reviewers, such as to assess whether an applicant's risk assessment is thorough and realistic and proposes adequate strategies to mitigate risks to the project. In addition, two of these four NOFOs included additional instructions for reviewers to consider social risks, such as for the reviewers to assess whether the applicants' description of likely challenges to implementation plans, including risks of harm to organization staff, project participants, or others, is thorough and has appropriate mitigation strategies; and whether the applicant's consideration of equity and inclusion analysis as part of risk assessment is in line with Do No Harm principles.

human rights concerns they identify, as well as any human rights recommendations or conditions stemming from their reviews.

Weaknesses Exist in How Agencies Monitored the Implementation and Effectiveness of Social Safeguards to Protect Human Rights in Selected Awards

USAID, FWS, and State had weaknesses in how they monitored the implementation and effectiveness of social safeguards to protect human rights and prevent abuses. For two of our seven selected awards, USAID included requirements for partners to provide periodic monitoring reports to it on the implementation and effectiveness of planned social safeguards, but it did not include similar requirements for the other five awards. USAID generally included requirements for our selected awards for partners to report abuse allegations or grievances to it in a timely manner. Although FWS completes an assessment of human rights abuse risks and planned social safeguards in the early stages of its direct-funded awards, it does not periodically update its risk assessments. FWS also does not require ongoing monitoring of partners' social safeguards to protect human rights unless its initial assessments identify "high" risks for an award. In addition, State did not ensure for our selected awards that its partners provided periodic monitoring updates on planned social safeguards. FWS and State awards also include broader requirements for partners to report significant issues or problems for their awards, but documentation for our selected awards did not specify that partners should report human rights abuse allegations or grievances to the agencies in a timely manner.

USAID Has Not Required All Partners to Provide Updates in Monitoring Reports on Social Safeguards

Although USAID included requirements in our seven selected USAID awards for its partners to provide social safeguards plans, it did not include requirements for each of them to provide monitoring updates on the implementation and effectiveness of planned social safeguards to protect human rights. Specifically, USAID included social safeguards monitoring requirements for two of our seven selected USAID awards but did not include similar requirements for the other five awards. USAID generally included requirements in our selected awards for partners to report abuse allegations or grievances to USAID within 72 hours.⁵³

Award documentation for two of our seven selected USAID awards included requirements for the partners to provide periodic monitoring updates to USAID on the implementation and effectiveness of social safeguard mechanisms. For these two USAID awards, periodic

⁵³USAID did not include a requirement to report abuse allegations or grievances to USAID for the Jane Goodall Institute award in our sample, which began in Nov. 2018 and was ongoing at the time of our review. However, it included a requirement for the subsequent award to the Jane Goodall Institute in our sample, which began in Aug. 2023.

monitoring reports provided at the time of our review included monitoring updates on social safeguards. For example:

- Award documentation for the USAID award to WCS for activities at Okapi Wildlife Reserve in the DRC stated that the partner must provide regular monitoring updates in periodic performance reports on any social risks and summarize the effectiveness of mitigation measures, including issues encountered, resolutions, and lessons learned. Award documentation also included monitoring indicators for social safeguard activities.⁵⁴ Semi-annual and annual performance reports that we reviewed for the award for September 2020 to March 2023 provided monitoring updates on the project's social safeguards, including community engagement, human rights training, and GRM. For example, the semi-annual report for October 2022-March 2023 noted that the project was drawing lessons from prior efforts in developing a strategy for engagement with Indigenous Peoples, women, and youth, which would include stakeholder mapping and an FPIC process. The report provided updates on efforts to recruit Indigenous Peoples and women as ecoguards. It also provided updates on the implementation of GRM, including a rollout of suggestion boxes and a hotline to additional villages, and on the numbers and types of complaints received in the first half of the fiscal year, as well as complaint status.⁵⁵

⁵⁴WCS did not provide a social safeguards plan to USAID for this award, which began in Sept. 2020, until May 2023. However, the 2021 Activity Monitoring, Evaluation, & Learning Plan and EMMP for the award included monitoring indicators for community engagement, human rights training for ecoguards, and piloting a GRM. Documentation from a Mar. 2023 USAID site visit to the Okapi Wildlife Refuge identified a need for the project to complete a strategy and implement concrete activities for engaging with Indigenous Peoples living in and around the refuge, and to implement more inclusive and equitable GRM. The May 2023 social safeguards plan and draft June 2023 EMMP for the award included activities and monitoring indicators related to the four social safeguards, including engagement with Indigenous Peoples, women, and youth, and an FPIC process. According to USAID officials, they were still in the process of reviewing the draft June 2023 plan as of Jan. 2024.

⁵⁵The annual report for Oct. 2021-Sept. 2022 for this award noted Indigenous Peoples residing in the park had faced decades of dehumanization, and that WCS had submitted a proposal to USAID for enhancing engagement with Indigenous Peoples, in collaboration with local partners. According to *USAID Guidance on Monitoring Free, Prior, and Informed Consent*, projects that did not initially include consultation with affected Indigenous Peoples can incorporate FPIC activities, such as participatory mapping to identify and consult with affected communities, culturally appropriate dispute resolution and GRM, and engagement with representative organizations to enter into negotiations and ensure they consent to the outcome of any disputes or grievances as well as planned activities.

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- Award documentation for the USAID award to WWF for activities at Salonga National Park in the DRC included monitoring plans and indicators related to the four social safeguards. The documentation also stated that WWF would report annually on the effectiveness of mitigation measures, issues encountered, resolutions, and lessons learned.⁵⁶ The September 2022–March 2023 semi-annual report for this award noted that during the first 6 months of the award, WWF focused on developing and launching project plans, including a social safeguards framework. The report cited significant logistical challenges with reaching some local communities that are only accessible by small planes or boats. Nevertheless, the report noted that a project partner had completed a stakeholder analysis in February 2023 and began implementing efforts to consult with local communities and Indigenous Peoples in March 2023. The report also provided updates on human rights training for ecoguards, outreach to communities on GRM, and the number and status of complaints received.

However, award documentation provided at the time of our review for the remaining five USAID awards did not include monitoring requirements specific to social risks or safeguards to protect human rights. Although periodic monitoring reports for these awards included some updates on safeguard mechanisms, we found certain gaps. For example:

- The 2021 award modification for the USAID award to the Virunga Foundation included social safeguard activities related to community consultation and engagement, human rights training for rangers, and GRM.⁵⁷ USAID’s April 2022 IEE for the award stated that the Virunga Foundation would develop an approach for meeting the four required

⁵⁶This award began in Sept. 2022, and WWF provided a social safeguards plan to USAID in Feb. 2023. The award focuses in part on the development and implementation of social safeguards for activities in Salonga National Park in the DRC. Award proposal documentation included an overview of project risks and described mitigation measures planned related to social safeguards.

⁵⁷The selected USAID award for the Virunga Foundation focused initially on support for an electric grid, but a 2021 modification for the award incorporated support for activities including law enforcement, security, community engagement, and economic and social development.

social safeguards as part of the partner's EMMP.⁵⁸ Although the Virunga Foundation provided a social safeguards plan in April 2023, the EMMP that USAID approved for the award in November 2023 does not include monitoring indicators or mitigation measures specific to the required social safeguards. Periodic performance reports that we reviewed for this award for October 2021-March 2023 provided some updates on social safeguard activities, such as on the number of rangers that received human rights training and efforts to advertise the park's GRM toll-free number. The performance reports, however, did not include updates on the status, or on any issues encountered, for community consultation activities contained in the 2021 award modification.⁵⁹ The reports also did not provide other details on the GRM, such as the number or type of complaints received.

- The original June 2021 contract for the USAID award to RTI for activities in Tanzania did not address project social safeguards. The quarterly reports we reviewed for October 2021-March 2023 also did not address such safeguards.⁶⁰ In September 2023, RTI officials told us that starting with their April-June 2023 report, they had begun including monitoring updates for USAID on project social safeguards to provide greater attention to the issue, even though USAID did not include social safeguards monitoring requirements in its contract. The report for April-June 2023 included an update on social safeguard training for rangers and stated that RTI had added language in all sub-agreements for partners to incorporate social considerations into

⁵⁸For example, USAID's IEE for this award stated that regular stakeholder consultations in all territories around the park would "play a crucial role in safeguarding it for generations to come." It also stated that the GRM established at Virunga National Park should address complaints and grievances and enhance conflict resolution; ensure transparency and accountability; resolve any emerging environmental and social grievances; and promote relations between the park and beneficiaries, including the surrounding communities.

⁵⁹The 2021 modification for the USAID award to the Virunga Foundation stated that the partner would regularly consult and engage with community stakeholders, including local chiefs, women associations, religious groups, environmental and human rights NGO's, youth groups, unions, and local media.

⁶⁰USAID modified the RTI contract in Aug. 2023 to reflect the requirement for a social safeguards plan that had been included in the Apr. 2021 IEE for the award. RTI provided a draft social safeguards plan to USAID in June 2023 and finalized it in Oct. 2023.

project assessments, including FPIC, code of conduct, human rights, and GRM.⁶¹

While USAID generally established requirements for our selected awards for partners to provide social safeguard plans, it has not established requirements for each of its partners to provide information in monitoring reports on the implementation and effectiveness of planned safeguards to prevent human rights abuses. Federal internal control standards state that management should establish monitoring activities to monitor the internal control system and evaluate results. Management should design appropriate types of control activities, which may include comparing actual performance to planned or expected results and analyzing significant differences.⁶² In addition, E.O. 13985, *Advancing Racial Equity and Support for Underserved Communities Through the Federal Government*, states that “each agency must assess whether, and to what extent, its programs and policies perpetuate systemic barriers to opportunities and benefits for people of color and other underserved groups. Such assessments will better equip agencies to develop policies and programs that deliver resources and benefits equitably to all.”⁶³

USAID officials stated that USAID expects partners to provide monitoring updates regarding social safeguards in periodic monitoring reports. However, the officials added that missions determine the specific language to include in an award regarding USAID’s social safeguards requirements, and so the language may vary by award. As a result,

⁶¹In addition, award documentation for the USAID award to African Parks Network for activities in Garamba National Park in the DRC and for the Chinko Conservation Area in the Central African Republic that began in October 2016 did not include monitoring requirements specific to social safeguards. Semi-annual and annual performance reports that we reviewed for this award for Oct. 2020-Mar. 2023 provided updates on some project social safeguards, including community engagement and human rights training, and on efforts to establish GRM at one project location (Chinko). The reports, however, did not provide updates on the status of GRM implementation and related challenges at Garamba National Park. From our visit at this location, we are aware the partner recently made some changes to its GRM process because of concerns that procedures were not effective and the GRM was not accessible to community members. The remaining two awards were provided to the Jane Goodall Institute for activities in Tanzania. USAID did not incorporate social safeguards requirements into the initial Jane Goodall Institute award in our sample, which began in 2018, but USAID did require the partner to provide a social safeguards plan for the follow-on award that began in Aug. 2023. However, award documentation provided to us during our review for the follow-on award did not include monitoring requirements specific to social safeguards. The Jane Goodall Institute had not yet provided any monitoring reports for that award at the time of our review.

⁶²[GAO-14-704G](#).

⁶³Exec. Order No. 13985, § 1.

language regarding a requirement for monitoring the implementation and effectiveness of project social safeguards to protect human rights may not be in every award.⁶⁴

Without ensuring all partners provide monitoring updates on the implementation and effectiveness of their planned social safeguard activities, USAID may be unaware of potential challenges or changes needed to address human rights abuse risks that could arise during a project. USAID also lacks assurance that each of its partners is taking appropriate steps to address any human rights abuse issues encountered or lessons learned. In addition, USAID does not have sufficient information to assess whether, and to what extent, its projects with ranger activities may be perpetuating systemic barriers to opportunities and benefits for Indigenous Peoples and other underserved groups.

FWS Has Not Periodically Updated Assessments of Human Rights Abuse Risks and Social Safeguards for Its Awards

USAID terms and conditions for social safeguards to protect human rights generally apply to FWS awards funded by USAID interagency agreement, according to FWS and USAID officials. However, for FWS's direct-funded awards, we found weaknesses in how FWS assesses human rights abuse risks and social safeguards. For example, FWS has not periodically updated the assessments of human rights abuse risks and project social safeguards that it conducts under its "abuse of power" pilot for direct-funded awards. In addition, while our four selected FWS awards funded by USAID interagency agreement generally included a requirement for partners to report abuse allegations or grievances to FWS within a period ranging from 72 hours to 20 days, FWS did not include a similar requirement for the two direct-funded awards in our sample. Federal internal control standards state that management should identify, analyze, and respond to change as part of a regular risk assessment process.⁶⁵ Management should periodically review policies, procedures, and related control activities for continued relevance and effectiveness in achieving the entity's objectives or addressing related risks. In addition, monitoring of the internal control system is essential in helping internal

⁶⁴USAID officials added that the IEEs for awards with ranger activities generally require partners to provide monitoring updates in Environmental Mitigation and Monitoring Reports. According to USAID officials, either performance monitoring reports or Environmental Mitigation and Monitoring Reports should include monitoring updates on planned social safeguards in accordance with the requirements in the IEE. However, USAID did not provide any Environmental Mitigation and Monitoring Reports with monitoring updates on social safeguards for our selected awards at the time of our review.

⁶⁵[GAO-14-704G](#). Changing conditions often prompt new risks or changes to existing risks that need to be assessed.

control remain aligned with changing objectives, environment, laws, resources, and risks.⁶⁶

For FWS awards funded by USAID interagency agreement, FWS officials told us that they were working with USAID on a process for incorporating social safeguards monitoring into reporting as of November 2023. We found that monitoring reports for the four selected FWS awards funded by USAID interagency agreement generally provided some updates on social safeguards to protect human rights. For example, annual performance reports for 2019 to 2022 for FWS's award to WCS that included activities in the proposed Oku Reserve in the DRC provided updates on the project's FPIC process for the creation of the Oku Reserve, discussions with local communities on their preferred methods for GRM, and security challenges which had delayed social safeguards activities to demarcate reserve boundaries. The September 2022 EMMP for this award incorporated a monitoring requirement for WCS to report on the effectiveness of social safeguard mitigation measures for risks identified in the EMMP.⁶⁷

As noted earlier, FWS conducts a risk assessment for applicants for its direct-funded awards under its "abuse of power" pilot that includes human rights abuse risks and planned social safeguards. However, FWS does not periodically update the risk assessments during award implementation. FWS also did not include requirements for partners to provide monitoring updates on the implementation and effectiveness of project social safeguards for our two selected direct-funded awards. Under the "abuse of power" pilot, FWS requires continued monitoring of human rights abuse risks and planned social safeguards for risks identified as "high" for a project. FWS's risk assessments for our two selected direct-funded FWS awards for partners in Tanzania identified several "low" and "medium" human rights abuse risks that could impact

⁶⁶[GAO-14-704G](#).

⁶⁷Regarding the remaining three of four selected FWS awards funded by USAID interagency agreement: The EMMP for FWS's award to WCS that was funded by USAID interagency agreement for activities in Nouabalé-Ndoki National Park in the Republic of the Congo was not yet approved at the time of our review. The ANPN award supporting national parks in Gabon that was funded by USAID interagency agreement did not include social safeguard requirements because, according to USAID officials, the project had nearly completed the award activities before USAID established the requirements. In addition, the WCS award for activities supporting Gabon's National Parks Agency did not include monitoring requirements for WCS to report on social safeguards, but annual reports for 2021 and 2022 included updates on the human rights training curriculum that was a focus of the award.

award activities, while noting the existence of significant human rights issues in the country, including extrajudicial killings and high levels of corruption. Accordingly, FWS did not require any monitoring updates from the partners for these two awards on human rights abuse risks and project social safeguards because FWS's risk assessments did not identify any "high" risk categories for these two awards.

According to FWS officials, FWS sought in developing the pilot to avoid establishing additional social safeguard requirements not warranted for activities that it deemed to be less than "high" risk. FWS officials added that their intent was not to apply blanket mitigation and monitoring measures for all activities. However, we found gaps in its initial risk assessments, as noted earlier, raising questions about whether FWS has obtained sufficient information from some partners to determine appropriate mitigation and monitoring measures for proposed activities. Moreover, by not updating its initial risk assessments during the course of implementation and not ensuring partners address human rights abuse risks and social safeguards in periodic monitoring reports, FWS may be unaware of gaps in its initial risk assessments as well as potential challenges or changes needed to address human rights abuse risks that could arise or change during a project.

- For STEP, one of the two selected FWS direct-funded awards, the performance report that was available at the time of our review, covering March to September 2022, provided updates on community consultation and outreach efforts but did not address the implementation or effectiveness of other planned project social safeguards, including human rights training and GRM.⁶⁸
- For FZS, the other selected FWS direct-funded award, the performance report, available at the time of our review, covering September 2021 to August 2022, noted that FZS did not plan to implement social safeguards activities until the fourth year of the

⁶⁸This report was for the first annual reporting period for this award, which began in March 2022. FWS conducted a site visit for this award in June 2023, which, according to the site visit report, included discussions of project social safeguards. However, site visits may be infrequent. STEP officials told us that their last site visit from FWS was about 5 years before the 2023 visit for a prior award.

award (2024 to 2025).⁶⁹ FWS shared a situation update document from FZS in September 2022 following news reports of violent conflict and potential evictions of Maasai people from protected areas in northern Tanzania, the region where the FZS award has activities.⁷⁰ According to FZS's situation update, the incidents did not occur at sites that the award supports, but FZS was in the process of developing environmental and social safeguards for award activities. However, the situation update did not include any other details on project safeguards, and FWS has not updated its 2021 risk assessment for this award.⁷¹

FWS officials told us that their intent with the pilot risk assessment was to focus on whether applicants had planned appropriate mitigation measures for identified risks. However, in periodically updating its risk assessments, FWS could consider the level of risk identified in its initial assessments, as well as information from partners' monitoring reports on any new or changing risks, to continue to take a risk-informed approach for its updates. Without periodically updating its assessments of human rights abuse risks and project social safeguards and ensuring that partners provide monitoring updates on their project social safeguards to inform its risk assessments, FWS does not have continued assurance its partners are taking appropriate steps to address any new or changing human rights abuse risks or issues encountered. It also does not have assurance that planned safeguards are working for the duration of projects in parks and protected areas where FWS supports ranger activities.

In addition, FWS considers project social risks and safeguards, including GRM, as part of its risk assessment process. However, the STEP and FZS awards did not include requirements for the partners to report human

⁶⁹FWS officials told us in Nov. 2023 that they had begun some activities for planned social safeguards under this award. Specifically, the officials stated that to inform the design of a grievance mechanism, FZS staff had taken steps to investigate and document issues that local communities have with project implementation. FZS officials added that they will be required to report to FWS on planned social safeguards training because the training is an activity funded by the award, but FWS has not established requirements for them to report on the implementation or effectiveness of any other planned safeguards, including GRM.

⁷⁰The FZS award includes support for Maasai tracking teams that conduct patrols with government rangers to monitor and track rhinos, as well as to monitor for illegal activities, within the Greater Serengeti Ecosystem in northern Tanzania.

⁷¹FWS officials noted that although they did not update the risk assessment for the FZS award, they continued to follow-up with the partner informally about the project and planned safeguard activities.

rights abuse allegations or grievances to FWS. According to FWS officials, award agreements include broader requirements for partners to report “significant developments” to FWS. Specifying the requirement to report human rights abuse allegations and grievances in a timely manner could ensure partners understand that “significant developments” include human rights abuse allegations. Federal internal control standards state that management should identify, analyze, and respond to risks. They also state that management should externally communicate the necessary quality information to achieve the entity’s objectives, and use quality information that is appropriate, current, complete, accurate, accessible, and provided on a timely basis.⁷²

FWS officials stated that they have begun considering adding a requirement for direct-funded awards to report abuse allegations similar to the requirement for awards funded by USAID interagency agreement. Specifically, the officials said they have started consultations with their attorneys to determine how to address any complaints received because of such a requirement. However, they did not provide additional details, such as a timeframe for implementing these efforts. Without clarifying requirements that partners are to report in a timely manner any grievances and human rights abuse allegations they receive, FWS risks that such allegations may be inadequately investigated or addressed. FWS also risks being unaware of potential issues or risks that could impede the success of a project.

State Has Not Ensured Partners Provide Updates in Monitoring Reports on Safeguards and Notify the Agency of Abuse Allegations

Since 2020, State/INL has incorporated language in NOFOs for combating wildlife trafficking stating that applicants should provide social safeguard plans for protecting human rights in projects. However, it has not ensured that partners provide information in monitoring reports on the implementation and effectiveness of those planned safeguard mechanisms. INL also did not ensure that partners reported human rights abuse allegations and grievances to State in a timely manner. Federal internal control standards state that management should establish monitoring activities to monitor the internal control system and evaluate results. Management should design appropriate types of control activities, which may include comparing actual performance to planned or expected results and analyzing significant differences.⁷³ In addition, E.O. 13985 states that “each agency must assess whether, and to what extent, its programs and policies perpetuate systemic barriers to opportunities and

⁷²GAO-14-704G.

⁷³GAO-14-704G.

benefits for people of color and other underserved groups. Such assessments will better equip agencies to develop policies and programs that deliver resources and benefits equitably to all.”

Award documentation for the four selected State awards that provided social safeguard plans⁷⁴ did not include monitoring requirements specific to social safeguards. We found that periodic monitoring reports for the activities of two of those four awards—for WCS and African Parks Network—addressed the projects’ social safeguards to protect human rights.⁷⁵ However, we found certain gaps in the monitoring reports for the remaining two awards, including minimal or no updates on social safeguards. For example:

- Of the six quarterly reports that we reviewed for the selected State award for the Virunga Foundation, five generally did not address social safeguards, and one report, covering April to June 2021, referenced “recycled” human rights training.⁷⁶ The report did not note whether the training was for staff or rangers or provide any other details on the training. According to the partner’s social safeguards plan, the Virunga Foundation’s approach relies on community consultation and engagement. The plan also notes that the partner has established a local GRM, but the reports did not provide updates on those social safeguards.
- In addition, of the five quarterly reports that we reviewed for State’s award for WCS in Tanzania, four generally did not reference social safeguards, and one report covering July to September 2022,

⁷⁴Four of our six selected State awards provided social safeguards plans with their proposals in response to State’s NOFOs, which stated that applicants should provide social safeguards plans. The other two State awards began prior to 2020, and their NOFOs did not include the language on social safeguards plans.

⁷⁵The award for WCS was for activities in parks and protected areas in the DRC and the Republic of the Congo, and the award for African Parks Network was for activities in parks and protected areas in Benin, Chad, Malawi, the Republic of the Congo, and Zambia.

⁷⁶We reviewed six quarterly reports covering Oct. 2020 to Mar. 2022 for the selected State Virunga Foundation award. We also reviewed a seventh report covering Oct. 2022 to Mar. 2023, which cited extreme challenges due to a rapidly deteriorating security situation in the region of the park and noted that the entire Mountain Gorilla Sector and other areas had come under rebel control. It noted that in Dec. 2022, a militia attacked an anti-poaching patrol and killed two Virunga Foundation staff. According to State/INL officials, three rangers were also killed in attacks in the park in May 2023. The officials stated that as of July 2023, INL had limited award assistance to fuel for aerial teams and technical and communications equipment, such as radio receivers and antennas for the mountainous terrain.

provided an update on the number of rangers receiving social safeguards training. The reports did not provide updates on any challenges or issues identified, or lessons learned related to project social safeguards to protect human rights. The social safeguards plan for this award addresses human rights training and broader WCS efforts to develop a global GRM.

State officials told us that they may receive informal monitoring updates on social safeguards during periodic calls that they conduct with partners. Officials added that they may also discuss social safeguards with partners during periodic site visits. We reviewed four site visit reports, provided by State as of June 2023 for three of our four selected awards which required social safeguard plans. We found that one report addressed social safeguards for a project site for the WCS award in the Republic of the Congo, and two reports for African Parks Network award activities in Benin, Chad, and the Republic of the Congo also addressed project safeguards. However, the report for the Virunga Foundation in DRC did not address social safeguards, and State did not provide site visit reports at the time of our review for African Parks Network activities in Malawi or Zambia, or for WCS in the DRC or Tanzania.

Without ensuring that partners provide periodic monitoring report updates to State on the implementation and effectiveness of their social safeguards to protect human rights, including any issues encountered, resolutions, and lessons learned, State may be unaware of potential challenges or changes needed to address human rights abuse risks or issues that may arise during a project. State also risks not having the information it needs to assess whether its partners are achieving the human rights objectives of their planned social safeguards and are taking the appropriate steps to address any human rights issues encountered or lessons learned. Moreover, State may not have assurance that it has the necessary information to assess whether, and to what extent, its projects with ranger activities may be perpetuating systemic barriers to opportunities and benefits for Indigenous Peoples and other underserved groups.

Additionally, while State requires partners to provide plans addressing social safeguards, including GRM, our six selected State awards did not include clear requirements for partners to report human rights abuse allegations and grievances to State in a timely manner. Federal internal control standards state that management should identify, analyze, and respond to risks. Management should externally communicate the necessary quality information to achieve the entity's objectives; and use

quality information that is appropriate, current, complete, accurate, accessible, and provided on a timely basis.

State's terms and conditions require grantees to notify State of any significant problems relating to the administrative, programmatic, or financial aspects of the award, according to INL officials. However, FWS informed us of some human rights abuse allegations of which State/INL was unaware. INL was unaware of a June 2022 abuse allegation regarding sexual exploitation and abuse by an eco-guard in Odzala-Kokoua park, where the selected African Parks Network multi-country award has activities. According to INL officials, in response to our inquiry about the allegations, INL communicated with partner officials to obtain information about the incident and to ensure that they notify INL of allegations in a timely manner.⁷⁷ State also was unaware of a March 2023 allegation of sexual abuse by an individual who was employed at Okapi Reserve, one of the locations where the selected State award for WCS activities in the DRC and the Republic of the Congo has activities. INL officials told us that staff turnover at WCS had occurred at this location, which likely contributed to the partner's failure to report the incident to State. Officials added that following our inquiry, State/INL reached out to the partner to ensure that WCS staff notify INL of allegations in a timely manner going forward.⁷⁸

Incidents that occur at parks and protected areas where agencies provide support can both cause harm to human beings and present risks to programs, even if the award did not directly support the individuals involved in a particular allegation. However, specifying for State's implementing partners that human rights abuse allegations and grievances fall under "significant problems related to the administrative, financial, or programmatic aspect of the award" could help ensure that partners report abuse allegations and grievances to State in a timely

⁷⁷According to State officials, African Parks Network has an organizational policy to report abuse allegations to donors within 72 hours. However, African Parks staff did not adhere to protocol in this case. In addition, according to INL officials, INL has deemed the grantee as a "high-risk" recipient and incorporated additional conditions into the award for the partner to provide updates on its social safeguards plans and procedures.

⁷⁸State/INL also was unaware of the pastoralist shooting in the same region where the WCS Tanzania award has activities. According to INL officials, in response to our email, they followed up with WCS Tanzania, who told them that the incident did not occur at a site where INL funds had support activities. However, the incident occurred in the same region in Tanzania where State/INL funds are supporting similar activities implemented by the same partner. INL officials reiterated to WCS that should future incidents occur, even if not directly related to INL programming, the grantee should inform INL.

manner. Without clarifying requirements that partners are to report in a timely manner the human rights abuse allegations or other grievances they receive, State risks that human rights abuse allegations may be inadequately investigated or addressed. State also risks being unaware of other potential human rights issues or risks that could impede the success of a project.

Conclusions

USAID, FWS, and State support park rangers and anti-poaching units that work to combat wildlife trafficking overseas, offering potential benefits for transnational security, rule of law, economic prosperity, and conservation. Reports in recent years raised concerns that U.S.-funded partner organizations have provided training and equipment for rangers who have committed human rights abuses, including sexual assault and extrajudicial killings.

While agencies have taken steps to enhance human rights protection mechanisms, or social safeguards, we found certain gaps in the agencies' planning and monitoring of social safeguards for selected awards. For example, while USAID generally incorporated requirements into selected awards for partners to provide social safeguards plans, several partners did not provide them in a timely manner. Taking steps to ensure that partners submit such plans in a timely manner will enable USAID to determine whether its partners have appropriately designed their social safeguard mechanisms to prevent human rights abuses from the start of projects. We also found weaknesses in the quality of information that FWS receives and uses for the project risk assessments it conducts for human rights abuses and social safeguards to protect human rights. In addition, while State requests social safeguards plans from applicants, it does not provide guidance for State officials who review project proposals on the human rights abuse risks and social safeguards they should consider as part of proposal reviews. As a result of these gaps, agencies risk that project activities could proceed without appropriate safeguards to protect human rights, and that human rights abuses could occur in their projects.

Agencies also have not ensured that all partners provide updates in monitoring reports on social safeguards to address human rights abuse risks for their ranger activities, including any issues encountered, resolutions, and lessons learned. Moreover, while USAID requires partners to report human rights abuse allegations to USAID in a timely manner, FWS and State do not have similar specific requirements. As a result, FWS and State do not have assurance that partners are reporting human rights abuse allegations at parks and protected areas they

support. By ensuring that partners provide information in monitoring reports on the implementation and effectiveness of their social safeguards and notify agencies of abuse allegations, agencies will be better equipped to assess potential challenges or changes needed to address human rights abuse risks or issues that may arise during a project, as well as whether their partners are taking appropriate steps to address them.

Recommendations for Executive Action

We are making the following nine recommendations, including two to USAID, four to FWS and three to State. Specifically:

The Administrator of USAID should take steps to ensure that implementing partners for awards with ranger activities meet the established timeframes to provide social safeguards plans. (Recommendation 1)

The Director of FWS should communicate guidance in NOFOs for applicants for direct-funded awards with ranger activities on what information to provide to FWS on project social risks and any planned social safeguard mechanisms to address those risks. These safeguards may include community consultation and engagement, consideration of Indigenous Peoples and FPIC principles, human rights training for rangers, and grievance and redress mechanisms. (Recommendation 2)

The Secretary of State should ensure INL develops internal guidance for officials who review social safeguards plans in applicant proposals regarding the social risks and social safeguard mechanisms they should consider. These safeguards may include community consultation and engagement, consideration of Indigenous Peoples and FPIC, human rights training for rangers, and grievance and redress mechanisms. (Recommendation 3)

The Administrator of USAID should ensure that implementing partners for awards with ranger activities that require social safeguards plans include information in periodic monitoring reports for USAID on the status of implementation of project social safeguard mechanisms and any steps taken to assess their effectiveness. This should include information on any issues encountered, resolutions, and lessons learned. (Recommendation 4)

The Director of FWS should periodically update the “abuse of power” risk assessments FWS conducts for direct-funded awards with ranger activities to analyze and respond to any changes in project human rights abuse risks and social safeguards. (Recommendation 5)

The Director of FWS, to inform its risk assessments, should ensure that implementing partners for direct-funded awards with ranger activities include updated information in periodic performance reports on human rights abuse risks and applicable project social safeguard mechanisms. This should include information on any issues encountered, resolutions, and lessons learned. (Recommendation 6)

The Director of FWS should clarify requirements for implementing partners for direct-funded awards with ranger activities to report grievances or human rights abuse allegations to FWS in a timely manner. (Recommendation 7)

The Secretary of State should ensure that implementing partners for INL awards with ranger activities that require social safeguards plans include information in periodic monitoring reports for State on the status of implementation of project social safeguard mechanisms and any steps taken to assess their effectiveness. This should include information on any issues encountered, resolutions, and lessons learned. (Recommendation 8)

The Secretary of State should ensure INL clarifies requirements for implementing partners for awards with ranger activities to report grievances or human rights abuse allegations to State in a timely manner. (Recommendation 9)

Agency Comments

We provided a draft of this report for review and comment to USAID, FWS, and State. We received written comments from each agency that are reprinted in appendixes III-V and summarized below. The agencies also provided technical comments, which we incorporated as appropriate.

In their comments, USAID, FWS, and State agreed with our recommendations. For our recommendation to USAID on timeframes for social safeguards plans, USAID noted that it plans to standardize social safeguards processes and requirements to better ensure that partners meet established timeframes for providing the plans. For our recommendation to USAID on monitoring social safeguards, USAID noted that it plans to standardize reporting requirements to ensure consistent application and effective monitoring across activities. It added that it also plans to formalize USAID staff responsibilities for ensuring compliance with the requirements.

For our recommendation to FWS on guidance for applicants in NOFOs, FWS stated that it has established requirements for applicants to provide

information to FWS on social risks associated with proposed projects, as well as planned mitigation measures. Specifically, following its review of an initial draft of this report, FWS included new guidance in an April 2024 NOFO on social safeguards and on the information that applicants are required to provide to FWS. FWS noted that it now plans to include this guidance as standard language in NOFOs. The actions that FWS described, if implemented effectively, would address our recommendation. For our recommendations to FWS on updating its risk assessments and monitoring social safeguards, FWS noted that it is developing new procedures for assessing and documenting social risks and impacts. FWS added that it is updating award terms and conditions to require partners to provide monitoring updates to FWS on the implementation and effectiveness of social safeguards. Finally, for our recommendation to FWS on reporting grievances or human rights abuse allegations, FWS stated that it is updating award terms and conditions to clarify partners' reporting requirements.

For our recommendation to State on internal guidance, State noted that it would consult with relevant bureaus and offices in developing internal guidance for officials who review applicants' social safeguards plans. For our recommendation to State on monitoring social safeguards, State noted that it plans to include language in future INL awards with ranger activities for grantees to report on social safeguards in periodic progress reports. Finally, for our recommendation to State on reporting grievances or human rights abuse allegations, State noted that it plans to include language in future INL awards requiring partners to report grievances or human rights abuse allegations to State in a timely manner.

As agreed with your office, unless you publicly announce the contents of this report earlier, we plan no further distribution until 14 days from the report date. At that time, we will send copies of this report to the appropriate congressional committees, the Administrator of USAID, and the Secretaries of Interior and State.

If you or your staff have any questions about this report, please contact Kimberly Gianopoulos at (202) 512-8612 or gianopoulosk@gao.gov. Contact points for our Offices of Congressional Relations and Public

Affairs may be found on the last page of this report. GAO staff who made major contributions to this report are listed in appendix VI.

A handwritten signature in black ink that reads "Kimberly Gianopoulos". The signature is written in a cursive style with a large initial 'K'.

Kimberly Gianopoulos
Managing Director, International Affairs and Trade

Appendix I: Objectives, Scope, and Methodology

We were asked to review human rights protection mechanisms and monitoring, among other things, related to U.S. efforts to combat wildlife trafficking. This review updates and expands upon work published in [GAO-21-139R](#), *Combating Wildlife Trafficking: Agencies Work to Address Human Rights Abuse Allegations in Overseas Conservation programs*.¹ This report addresses (1) what changes U.S. agencies have made to their mechanisms for safeguarding human rights, or social safeguards, in efforts to combat wildlife trafficking since 2020, (2) the extent to which agencies and implementing partners have planned for social safeguard mechanisms for selected awards, and (3) the extent to which agencies and implementing partners have monitored and assessed the effectiveness of social safeguard mechanisms for selected awards.²

To describe any changes that agencies have made in their social safeguard mechanisms in efforts to combat wildlife trafficking since 2020, we reviewed documentary information from the U.S. Agency for International Development (USAID), the U.S. Fish and Wildlife Service (FWS), and the Department of State, such as agency policies or guidance related to social safeguards. We also conducted interviews with agency officials from USAID's Bureau for Resilience, Environment and Food Security; FWS's International Affairs Program; and State's Bureau of International Narcotics and Law Enforcement (INL).

To examine the extent to which agencies and implementing partners have planned for, and monitored and assessed the effectiveness of, social safeguards for selected awards, we selected a non-generalizable, judgmental sample of 19 USAID, FWS, and State awards with ranger activities in Africa. We limited our selected awards and locations for fieldwork to Africa because of prior ranger-related human rights abuse allegations in the region and because the majority of USAID, FWS, and State funding for awards with ranger activities in Africa and Asia was provided for locations in Africa in fiscal years 2020 to 2022. To inform our selection, we reviewed award funding data and information provided by

¹See GAO, *Combating Wildlife Trafficking: Agencies Work to Address Human Rights Abuse Allegations in Overseas Conservation programs*, [GAO-21-139R](#) (Washington, D.C.: Oct. 2, 2020).

²For this report, we generally refer broadly to the following four human rights protection mechanisms, or social safeguards, which may be considered as positive practices for projects with potential impacts on Indigenous Peoples and local communities: (1) community consultation and engagement, (2) consideration of Indigenous Peoples and Free, Prior, and Informed Consent (FPIC) principles, (3) human rights training (for rangers, ecoguards, and law enforcement), and (4) Grievance and Redress Mechanisms (GRM). We generally refer to these as social safeguard mechanisms.

each agency. We also conducted interviews with agency officials regarding the scope and status of any ranger activities and social safeguards for their awards. We also conducted interviews and email communications with USAID and State officials at several overseas posts regarding ranger activities and social safeguards, as well as logistical and security considerations for site visits.

We focused our selection of awards as well as countries and locations for fieldwork on those that had ongoing or planned activities in fiscal year 2023. We further based our selection on factors such as scope of ranger activities and social safeguards in awards, locations with prior human rights abuse allegations in the areas receiving support, and relatively higher estimated funding for ranger activities. We did not corroborate whether allegations of abuse actually occurred, as this was not within the scope of our review. We also focused our selection on awards with ranger activities in locations where we conducted fieldwork in two countries—the Democratic Republic of the Congo (DRC) and Tanzania. Because our sample only included one selected award for FWS in the DRC and one for State in Tanzania, for each of those agencies, we selected at least one additional award with ranger activities in other countries in Africa. For FWS, we selected awards funded through interagency agreement from USAID, as well as awards funded directly by FWS appropriations, to assess social safeguards for awards funded by the different sources. Table 3 provides additional details on our judgmental sample of USAID, FWS, and State combating wildlife trafficking awards with ranger activities.

Table 3: GAO Sample of Selected USAID, FWS, and State Combating Wildlife Trafficking Awards with Ranger Activities

No.	Agency	Country	Implementing Partner	Location (park/protected area) of Assistance	Period of Award
1.	USAID	Democratic Republic of the Congo (DRC)/ Central African Republic (CAR)	African Parks Network	Garamba National Park (DRC), Chinko Conservation Area (CAR)	October 2016–September 2024
2.	USAID	DRC	Virunga Foundation	Virunga National Park	January 2019–January 2027
3.	USAID	DRC	Wildlife Conservation Society	Okapi Wildlife Reserve	September 2020–September 2025
4.	USAID	DRC	World Wildlife Fund	Salonga National Park	September 2022–January 2028
5.	USAID	Tanzania	Jane Goodall Institute	Gombe National Park and surrounding areas	November 2018–November 2023
6.	USAID	Tanzania	Jane Goodall Institute	Gombe National Park and surrounding areas	August 2023–July 2028

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No.	Agency	Country	Implementing Partner	Location (park/protected area) of Assistance	Period of Award
7.	USAID	Tanzania	Research Triangle Institute, International	Seven wildlife corridors throughout Tanzania	June 2021–June 2026
8.	FWS (USAID interagency agreement) ^a	DRC	Wildlife Conservation Society	Kahuzi-Biega National Park, (proposed) Oku Wildlife Reserve	November 2018–June 2024
9.	FWS (USAID interagency agreement) ^a	Gabon	National Agency for National Parks	All National Parks	August 2013–May 2023
10.	FWS (USAID interagency agreement) ^a	Gabon	Wildlife Conservation Society	All National Parks	October 2019–January 2026
11.	FWS (USAID interagency agreement) ^a	Republic of the Congo	Wildlife Conservation Society	Nouabalé-Ndoki National Park	January 2021–January 2025
12.	FWS (direct-funded) ^b	Tanzania	Frankfurt Zoological Society	Greater Serengeti Ecosystem and Mkomazi National Park	September 2021–October 2025
13.	FWS (direct-funded) ^b	Tanzania	Southern Tanzania Elephant Program	Rungwa-Kizgo-Muhesi Game Reserve Complex, Nyerere National Park, Udzungwa Mountains National Park, Kilombero Valley	March 2022–June 2024
14.	State	DRC	African Parks Network	Garamba National Park	October 2019–September 2024
15.	State	DRC	Virunga Foundation	Virunga National Park	September 2020–March 2024
16.	State	DRC/Republic of the Congo	Wildlife Conservation Society	Okapi Wildlife Reserve (DRC), Nouabalé-Ndoki National Park and Lac Télé Community Reserve (Republic of the Congo)	November 2022–September 2024
17.	State	Tanzania	Southern Tanzania Elephant Program	Ruaha-Rungwa Ecosystem	May 2020–September 2024
18.	State	Tanzania	Wildlife Conservation Society	Rungwa-Rukwa	April 2022–June 2024
19.	State	Benin/Chad/Malawi/Republic of the Congo/Zambia	African Parks Network	Pendjari National Park and W (Benin), Zakouma National Park (Chad), Nkhotakota National Park (Malawi), Liwonde National Park (Malawi), Odzala Kokoua National Park (Republic of the Congo), Kafue National Park (Zambia)	September 2021–September 2024

Source: GAO summary of information about our judgmental sample of U.S. Agency for International Development (USAID), the Department of the Interior's U.S. Fish and Wildlife Service (FWS), and the Department of State's awards with ranger activities. | GAO-24-106553

^aAn interagency agreement with USAID funded the four FWS awards with ranger activities in the DRC, Gabon, and the Republic of the Congo.

^bFWS used appropriations made to the agency to fund the two awards in Tanzania.

For each of our selected awards, we reviewed award documentation provided by the agencies for information on ranger activities and any related social safeguards. This documentation included application and proposal materials, project plans, risk analyses and impact assessments, award agreements, modifications, and periodic monitoring reports. We also conducted interviews with agency and implementing partner officials, as well as rangers and community members available at project sites that we visited during our fieldwork in the DRC and Tanzania.

One analyst reviewed the documentation and testimonial evidence provided for each award for information relevant to social safeguards, including by reviewing the content and searching for terms and phrases such as social safeguards, human rights, rangers, ecoguards, community consultation and engagement, Indigenous Peoples, Free, Prior, and Informed Consent (FPIC), and grievance and redress mechanisms (GRM) to identify relevant information for that award. We compared information gathered from the award documentation and interviews on how agencies plan for, and monitor the implementation and effectiveness of, social safeguards in selected awards to agency policies and procedures, award terms and conditions, federal internal control standards, and Executive Order (E.O.) 13985, *Advancing Racial Equity and Support for Underserved Communities Through the Federal Government* to identify any gaps or areas for improvement in planning and monitoring of social safeguards.³ We determined the risk assessment, control activities, information and communication, and monitoring components of federal internal control standards were significant to our audit objectives.

A second analyst then reviewed the award documentation and conclusions from the first analyst's review. The two analysts discussed and resolved any disagreements before they finalized the analysis for each award. Because we judgmentally selected our awards and locations for fieldwork, our findings cannot be generalized.

To describe agencies' funding levels, we reviewed estimated USAID allocations and estimated FWS and State obligations, for ranger activities in Africa and Asia, by country and by award, for fiscal years 2020 to 2022 (the most recent available data at the time of our review). We selected

³86 Fed. Reg. 7009 (Jan. 25, 2021).

Africa and Asia because of prior ranger-related human rights abuse allegations for U.S.-funded activities in those regions. Funding generally represents estimates because agencies do not readily track funding specifically for ranger activities, and because of differences in how agencies defined ranger activities.

Specifically, according to USAID officials, USAID compiled data on estimated allocations for ranger activities based on USAID officials' review of award funding attributions and on the informed professional judgments of award managers and staff drawing on activity objectives, implementation plans, reporting, or other personal knowledge of specific activities.⁴ According to FWS officials, they used a query to identify all awards that were obligated between fiscal years 2020 to 2022, reviewed the scope of work section of each award to determine which included ranger activities, and estimated what dollar amounts were obligated to these activities.⁵ According to State/INL officials, INL reviewed its entire program portfolio and identified awards that included ranger activities as a primary and significant programmatic component.⁶ To assess the reliability of these data, we reviewed the data for logical inconsistencies or missing data and interviewed agency officials to identify and address

⁴According to USAID officials, ranger funding supports a range of activities, such as on-the-ground support to protected areas to reduce and deter poaching, which may consist of non-lethal equipment and technology (such as food rations, tents, and GPS units); training support to relevant staff, rangers, and community leaders to enhance ranger patrolling, information gathering and analysis, and the detection and prosecution of wildlife crime. Funding also supports activities focused on community-managed protected areas, such as community-led or joint community-government patrols, and efforts to engage rural community members in crime detection and monitoring outside of state-managed protected areas. In addition, funding supports training and technical equipment and supplies to enhance other enforcement activities, such as coordination mechanisms, operational units, information handling systems, intelligence-led operations, and transnational law enforcement coordination focused on organized wildlife crime and anti-corruption efforts.

⁵According to FWS officials, ranger funding includes support for park rangers, patrolling, and other law enforcement activities. FWS considers park rangers as having a mandate for managing or patrolling protected areas. Patrolling is defined as scheduled field surveillance of a protected area to protect wildlife and to deter illegal activities. Other law enforcement includes support to anyone who has the authority to carry weapons or make arrests.

⁶According to State officials, State's awards support activities such as on-the-ground support to protected areas to reduce and deter poaching. This on-the-ground support may consist of equipment and technology, and training support of relevant staff, rangers, and community leaders to enhance ranger patrolling, intelligence gathering and analysis, and the detection of wildlife crime. We determined that the entire amount of funding for State's awards can be considered estimated ranger obligations based on the scope of activities for those awards.

any issues of completeness, timeliness, consistency, or potential gaps or inaccuracies in the data. We determined that the funding data were sufficiently reliable to provide approximate information on agencies' ranger funding by country and award during this period.

We conducted this performance audit from January 2023 to July 2024 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that our findings provide a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix II: Agencies' Support for Ranger Activities in Africa and Asia, Fiscal Years 2020 to 2022

The U.S. Agency for International Development (USAID), the Department of the Interior's U.S. Fish and Wildlife Service (FWS), and the Department of State supported a variety of ranger activities in their efforts to combat wildlife trafficking in Africa and Asia in fiscal years 2020 to 2022. Following are funding data and descriptive information about each agency's ranger activities.

USAID Awards with Ranger Activities

USAID funding supports various ranger activities, including ranger patrols within protected areas to detect and deter poaching, training for staff and rangers, and activities to prevent corruption related to the illegal wildlife trade, among others. In addition, USAID officials noted that some awards with ranger activities include a primary or significant focus on human rights and social safeguards.

USAID supported 36 awards with ranger activities in Africa in fiscal years 2020 to 2022, for about \$47,336,000.¹ The Central Africa Regional Program for the Environment (CARPE), USAID's largest land management program in Africa, received the most ranger funding during these fiscal years. CARPE supports efforts to preserve the Congo Basin, which is the second-largest rainforest in the world. CARPE currently supports efforts in these six countries: Cameroon, the Central African Republic, the Democratic Republic of the Congo, Equatorial Guinea, Gabon, and the Republic of the Congo.

Table 4 provides additional details on USAID's estimated allocations for ranger activities in Africa, by mission or region.

Table 4: USAID Estimated Allocations for Ranger Activities in Africa, by Mission or Region, Fiscal Years 2020-2022

Dollars in thousands

USAID Mission or Region	Number of Awards	Ranger ^a	Community ^b	Other Enforcement ^c	Total Ranger Activities ^d
CARPE ^e	7	\$5,551	\$3,650	\$2,650	\$11,851
Southern Africa Regional	4	2,448	1,798	3,348	7,594
Mozambique	4	4,150	1,250	1,400	6,800
Kenya	3	1,700	4,300	250	6,250
Tanzania	5	400	3,750	350	4,500

¹In technical comments from its review of a draft of this report, USAID informed us that the Southern Africa Regional Operating Unit had an additional award that included \$150,000 in estimated allocations for ranger activities in fiscal year 2020. This award, which ran from July 2017 to July 2022, was provided to Sustainable Agriculture Technology.

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USAID Mission or Region	Number of Awards	Ranger^a	Community^b	Other Enforcement^c	Total Ranger Activities^d
West Africa Regional	1	1,142	258	1,050	2,450
Malawi	1	500	1,000	500	2,000
Madagascar	4	—	1,110	781	1,891
Zambia	2	400	1,050	400	1,850
Uganda	3	300	450	700	1,450
East Africa Regional	2	—	—	700	700
Total	36	\$16,591	\$18,616	\$12,129	\$47,336

Legend: — = not applicable.

Source: GAO analysis of U.S. Agency for International Development (USAID) data. | GAO-24-106553

Notes: USAID provided estimated allocations for ranger activities within awards in fiscal years 2020 to 2022 because, according to USAID officials, USAID does not track ranger funding. Officials added that USAID does not track funding by country but by Operating Unit. This table includes funding provided by USAID missions in the countries listed, as well as by regional Operating Units in Africa. Regional funding supports various countries, some of which may not be listed in the table. In addition, some countries may receive USAID funding from sources other than USAID mission or regional funding. Dollars are rounded to the nearest thousand.

^aAccording to USAID officials, these allocations support a range of activities, such as on-the-ground support to protected areas to reduce and deter poaching, which may consist of equipment and technology; training of relevant staff, rangers, and community leaders to enhance ranger patrolling, information gathering and analysis, and the detection and prosecution of wildlife crime.

^bAccording to USAID officials, these allocations support ranger activities focused on community-managed protected areas and may include community-led or joint community-government patrols, efforts to engage rural community members in crime detection, and monitoring outside of state-managed protected areas.

^cAccording to USAID officials, these allocations provide a range of support that includes training and technical equipment and supplies to enhance activities, such as coordination mechanisms, operational units, information handling systems, intelligence-led operations, and transnational law enforcement coordination focused on organized wildlife crime and anti-corruption efforts.

^dThis total represents the sum of Ranger, Community, and Other Enforcement allocations.

^eCARPE refers to the Central Africa Regional Program for the Environment, which is under the Central Africa Regional Operating Unit. USAID was not able to break out CARPE-funded ranger activities by country. CARPE awards may support activities in countries that include Cameroon, the Central African Republic, the Democratic Republic of the Congo, Equatorial Guinea, Gabon, and the Republic of the Congo.

Figure 7 provides a map of the locations in Africa where USAID provided support for ranger activities.

Appendix II: Agencies' Support for Ranger Activities in Africa and Asia, Fiscal Years 2020 to 2022

USAID missions supported ranger activities in six countries in Asia, with activities in Vietnam receiving the largest amount of funding in fiscal years 2020 to 2022 (see table 5). USAID also provided Asia Regional funding to Interpol that included training rangers from Indonesia, Malaysia, Nepal, and Sri Lanka to build their capacity and foster coordination for investigating transnational environmental crime cases, such as wildlife trafficking.

Table 5: USAID Estimated Allocations for Ranger Activities in Asia, by Mission or Region, Fiscal Years 2020-2022

Dollars in thousands

USAID Mission or Region	Number of Awards	Ranger ^a	Community ^b	Other Enforcement ^c	Total Ranger Activities ^d
Vietnam	3	\$3,020	\$1,657	\$2,230	\$6,907
Indonesia	3	175	3,476	—	3,651
Philippines	2	1,120	1,250	350	2,720
USAID Asia Regional	1	—	—	1,250	1,250
Nepal	1	50	750	—	800
Bangladesh	1	50	570	50	670
Cambodia	2	161	295	60	517
Total	13	\$4,576	\$7,998	\$3,940	\$16,514

Legend: — = not applicable.

Source: GAO analysis of U.S. Agency for International Development (USAID) data. | GAO-24-106553

Notes: USAID provided estimated allocations for ranger activities within awards in fiscal years 2020 to 2022 because, according to USAID officials, USAID does not track ranger funding. Officials added that USAID does not track funding by country but by Operating Unit. This table includes funding provided by USAID missions in the countries listed, as well as by the Asia Regional Operating Unit. According to USAID officials, Asia Regional funding supported ranger activities in Indonesia, Malaysia, Nepal, and Sri Lanka. Some countries may receive USAID funding from sources other than USAID mission or regional funding. Dollars are rounded to the nearest thousand. Totals may not add up due to rounding.

^aAccording to USAID officials, these allocations support a range of activities, such as on-the-ground support to protected areas to reduce and deter poaching, which may consist of equipment and technology; training of relevant staff, rangers, and community leaders to enhance ranger patrolling, information gathering and analysis, and the detection and prosecution of wildlife crime.

^bAccording to USAID officials, these allocations support ranger activities focused on community-managed protected areas and may include community-led or joint community-government patrols, efforts to engage rural community members in crime detection, and monitoring outside of state-managed protected areas.

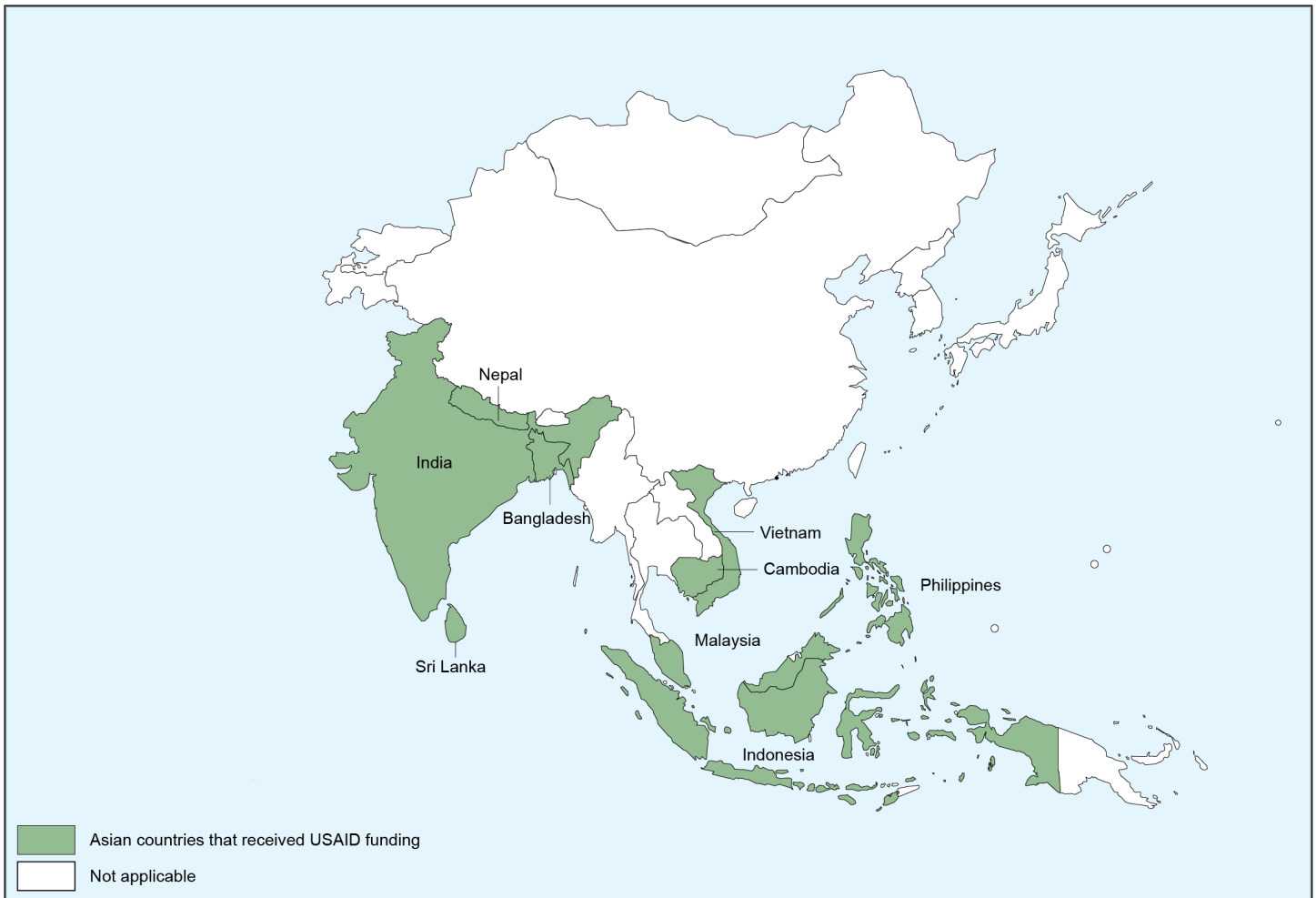
^cAccording to USAID officials, these allocations provide a range of support that includes training and technical equipment and supplies to enhance activities, such as coordination mechanisms, operational units, information handling systems, intelligence-led operations, and transnational law enforcement coordination focused on organized wildlife crime and anti-corruption efforts.

^dThis total represents the sum of Ranger, Community, and Other Enforcement funding.

Figure 8 provides a map of the locations in Asia where USAID provided support for ranger activities.

Appendix II: Agencies' Support for Ranger Activities in Africa and Asia, Fiscal Years 2020 to 2022

Figure 8: Map of Countries in Asia that Received USAID Funding for Ranger Activities, Fiscal Years 2020-2022



Source: GAO analysis of U.S. Agency for International Development (USAID) data; Map Resources (map). | GAO-24-106553

USAID provided funding to 26 implementing partners to carry out these 49 awards with ranger activities in Africa and Asia fiscal years 2020 to 2022 (see table 6). The World Wildlife Fund received the most funding, for six awards with ranger activities across Central and Southern Africa, Madagascar, and Vietnam.

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Table 6: USAID Estimated Allocations for Ranger Activities in Africa and Asia, by Implementing Partner, Fiscal Years 2020-2022

Dollars in thousands

Implementing Partner	Number of Awards	Mission or Region	Total Ranger Activities
World Wildlife Fund, Inc.	6	CARPE ^a , Madagascar, Vietnam, USAID Southern Africa Regional	\$14,142
Wildlife Conservation Society	4	CARPE, Mozambique, Uganda	7,650
Chemonics International, Inc.	4	Bangladesh, Indonesia, Tanzania, USAID Southern Africa Regional	4,925
African Parks Network	2	CARPE	4,351
Research Triangle Institute International	3	Philippines, Tanzania, Uganda	4,275
Tetra Tech, Inc.	4	Cambodia, Madagascar, USAID West Africa Regional	3,667
DAI Global, LLC.	4	Mozambique, Nepal, Vietnam	3,100
Wildlife Conservation Park	1	CARPE	3,000
Northern Rangelands Trust	1	Kenya	3,000
International Fund for Animal Welfare, Inc.	2	Kenya, USAID Southern Africa Regional	2,400
PACT, Inc.	2	Madagascar, Malawi	2,300
Kenya Wildlife Service	1	Kenya	1,450
Virunga Foundation	1	CARPE	1,300
Interpol	1	USAID Asia Regional	1,250
Gerry Roxas Foundation, Inc.	1	Philippines	1,170
The Jane Goodall Institute	2	Tanzania	1,150
The Nature Conservancy	1	Zambia	1,025
Gorongosa (Restoration) Project	1	Mozambique	1,000
Frankfurt Zoological Society	1	Zambia	825
Yayasan Keanekaragaman Hayati Indonesia	1	Indonesia	650
TradeMark Africa	1	USAID East Africa Regional	600
Resonance	1	Indonesia	426
International Union for Conservation of Nature	1	USAID East Africa Regional	100
Turtle Survival Alliance	1	Madagascar	50
Uganda Biodiversity Fund	1	Uganda	25
Lawyer's Environmental Action Team	1	Tanzania	20
Total	49	—	\$63,850

Legend: — not applicable.

Source: GAO analysis of U.S. Agency for International Development (USAID) data. | GAO-24-106553

Appendix II: Agencies' Support for Ranger Activities in Africa and Asia, Fiscal Years 2020 to 2022

Notes: This table includes USAID implementing partners that received awards for ranger activities in Africa and Asia in fiscal years 2020 to 2022. Some partners received awards for activities in both regions. USAID provided estimated allocations for ranger activities within awards because, according to USAID officials, USAID does not track ranger funding. Officials added that USAID does not track funding by country but by Operating Unit. This table includes funding provided by USAID missions in the countries listed, as well as by regional Operating Units. Regional funding supports various countries, some of which may not be listed in the table. In addition, some countries may receive USAID funding from sources other than USAID mission or regional funding. Dollars are rounded to the nearest thousand. Totals may not add up due to rounding.

³CARPE refers to the Central Africa Regional Program for the Environment which is under the Central Africa Regional Operating Unit. USAID was not able to break out CARPE-funded ranger activities by country. CARPE awards may support activities in countries that include Cameroon, the Central African Republic, the Democratic Republic of the Congo, Equatorial Guinea, Gabon, and the Republic of the Congo.

FWS Awards with Ranger Activities

FWS's funding for ranger activities supported park ranger, patrolling, and other law enforcement activities. FWS defined park rangers as those with a legal mandate for managing and patrolling protected areas. Of the 39 awards with obligations for ranger activities in Africa for fiscal years 2020 to 2022, three were funded by interagency agreement with USAID, including two for Gabon and one multicountry award.² FWS provided most of the funding for ranger activities in Africa, which totaled about \$6,983,000, compared to about \$507,000 for activities in Asia (see tables 7 and 8). FWS provided funding for 17 awards in nine countries in Asia, of which two awards, one in Vietnam and one in Thailand, were funded by interagency agreement with USAID.

Table 7: FWS Estimated Obligations for Ranger Activities in Africa, by Country, Fiscal Years 2020-2022

Dollars in Thousands

Country	Number of Awards	Total Ranger Activities
Gabon ^a	2	\$3,443
Zambia	8	1,367
Kenya	7	539
Tanzania	6	490
Namibia	3	263
Zimbabwe	2	260
South Africa	3	245
Benin	1	130
Rwanda	1	114
Nigeria	1	67

²The multicountry award supported activities in Nigeria and Cameroon. FWS did not break out ranger funds by country for this award.

Appendix II: Agencies' Support for Ranger Activities in Africa and Asia, Fiscal Years 2020 to 2022

Country	Number of Awards	Total Ranger Activities
Cameroon	2	30
Ghana	1	22
Africa (multicountry) ^b	1	11
Cote d'Ivoire	1	3
Total	39	\$6,983

Source: GAO analysis of U.S. Fish and Wildlife Service (FWS) data. | GAO-24-106553

Notes: FWS provided estimated obligations for ranger activities within awards for the period from fiscal year 2020 through 2022 because, according to FWS officials, FWS does not track ranger funding. According to FWS officials, ranger obligations include support for park ranger, patrolling, and other law enforcement activities. FWS considers park rangers as having a mandate for managing or patrolling protected areas. Patrolling is defined as scheduled field surveillance of a protected area to protect wildlife and to deter illegal activities. According to FWS officials, other law enforcement includes support to anyone who has the authority to carry weapons or make arrests. Dollars are rounded to the nearest thousand. Totals may not add up due to rounding.

^aAn interagency agreement with the U.S. Agency for International Development funded the two FWS awards with ranger activities in Gabon.

^bFWS did not break out ranger funding by country for this award, which supports efforts to combat wildlife trafficking in Nigeria and Cameroon.

Table 8: FWS Estimated Obligations for Ranger Activities in Asia, by Country, Fiscal Years 2020-2022

Dollars in Thousands

Country	Number of Awards	Total Ranger Activities
Indonesia	4	\$195
Vietnam ^a	2	82
Thailand ^b	4	78
Cambodia	2	64
Laos	1	43
India	1	17
Bhutan	1	16
Bangladesh	1	9
Malaysia	1	4
Total	17	\$507

Source: GAO analysis of U.S. Fish and Wildlife Services (FWS) data. | GAO-24-106553

Notes: FWS provided estimated obligations for ranger activities within awards for the period from fiscal year 2020 through 2022 because, according to FWS officials, FWS does not track ranger funding. According to FWS officials, ranger obligations include support for park ranger, patrolling, and other law enforcement activities. FWS considers park rangers as having a mandate for managing or patrolling protected areas. Patrolling is defined as scheduled field surveillance of a protected area to protect wildlife and to deter illegal activities. According to FWS officials, other law enforcement includes support to anyone who has the authority to carry weapons or make arrests. Dollars are rounded to the nearest thousand. Totals may not add up due to rounding.

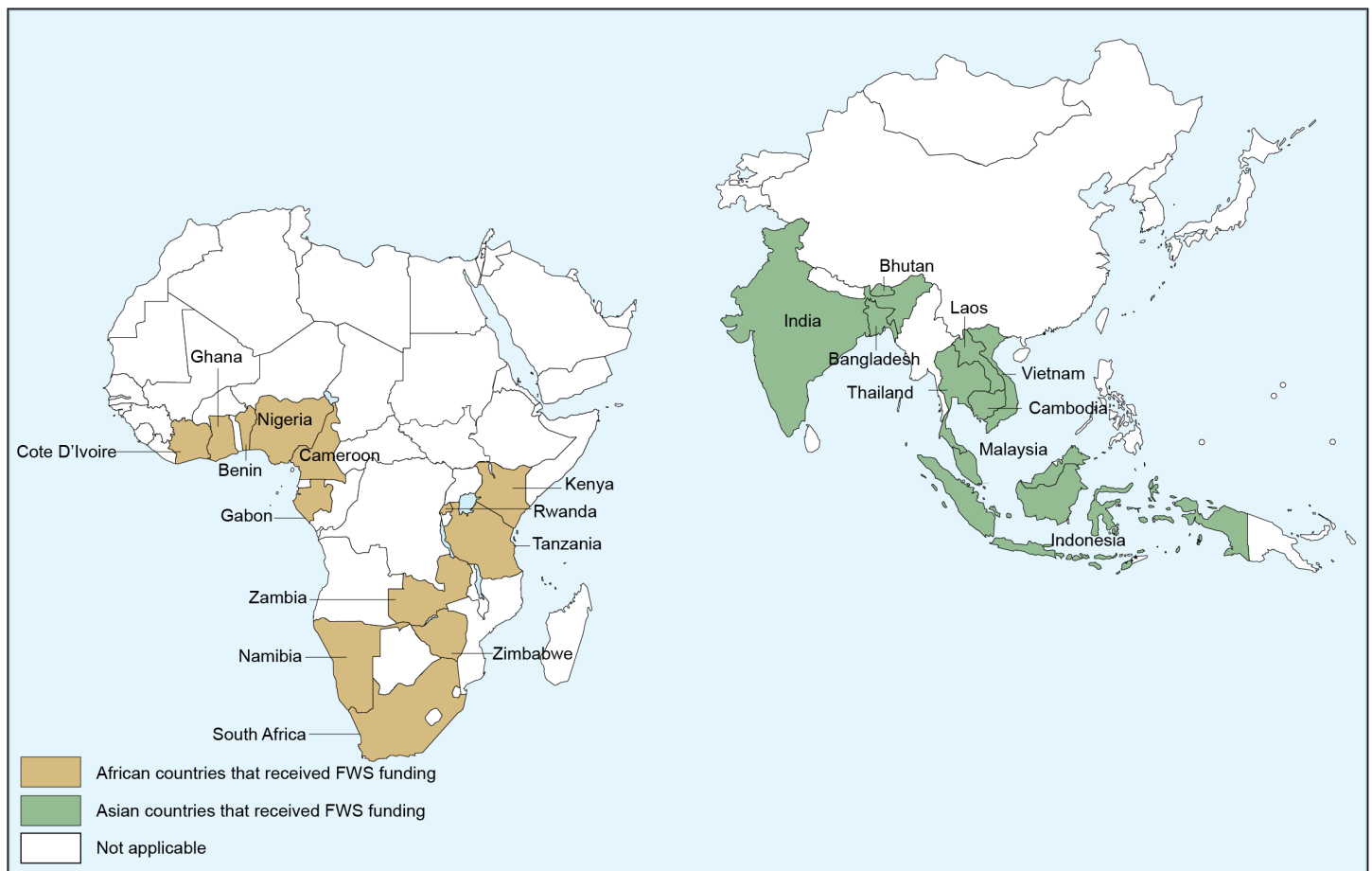
^aAn interagency agreement with the U.S. Agency for International Development (USAID) funded one of the two awards in Vietnam for \$72,000 in estimated ranger obligations in fiscal years 2020 to 2022.

Appendix II: Agencies' Support for Ranger Activities in Africa and Asia, Fiscal Years 2020 to 2022

^bAn interagency agreement with USAID funded one of the four awards in Thailand for \$5,000 in estimated ranger obligations in fiscal years 2020 to 2022.

Figure 9 provides a map of the locations in Africa and Asia where FWS provided support for ranger activities.

Figure 9: Maps of Countries Receiving FWS Awards with Ranger Activities in Africa and Asia, Fiscal Years 2020-2022



Source: GAO analysis of U.S. Fish and Wildlife Service (FWS) data; Map Resources (maps). | GAO-24-106553

FWS provided funding to 27 implementing partners to carry out these 56 awards with ranger activities across Africa and Asia. Gabon's park

Appendix II: Agencies' Support for Ranger Activities in Africa and Asia, Fiscal Years 2020 to 2022

service, the National Agency for National Parks (ANPN), received the most funding totaling about \$2,997,000.³

Table 9: FWS Estimated Obligations for Ranger Activities in Africa and Asia, by Implementing Partner, Fiscal Years 2020-2022

Dollars in Thousands

Implementing Partner	Number of Awards	Country	Total Ranger Activities
National Agency for National Parks ^a	1	Gabon	\$2,997
Zoologische Gesellschaft Frankfurt Von 1858 E.V.	6	Tanzania, Zambia	684
Save the Rhino International	8	Kenya, Namibia, South Africa, Tanzania	651
Conservation Lower Zambezi	2	Zambia	549
Frankfurt Zoological Society, US Inc.	2	Zambia, Zimbabwe	538
Wildlife Conservation Society ^a	1	Gabon	446
Wildlife Conservation Society	11	Bangladesh, Cameroon, Indonesia, Laos, Malaysia, Nigeria, Thailand, Africa (multicountry) ^b	295
South Luangwa Conservation Society	2	Zambia	248
Big Life Limited	2	Kenya	219
African Parks Foundation	1	Benin	130
Wildlife Asia Ltd.	1	Indonesia	120
Kitabi College of Conservation and Environmental Management	1	Rwanda	114
Wild Landscapes Inc.	1	Kenya	96
Southern Tanzania Elephant Program	2	Tanzania	80
Save Vietnam's Wildlife	1	Vietnam	72

³According to USAID officials, USAID considers Gabon's National Agency for National Parks (ANPN) to be a commercial parastatal organization per the definition in USAID's Automated Directives System (ADS) 302.3.3(a). See ADS ch. 302, *USAID Direct Contracting*. For example, USAID officials noted that ANPN maintains its own revenue streams and is set up to be profit-generating. FWS officials added that the ANPN had a unique bank account dedicated only to the FWS award funds. The ANPN award, which was from Aug. 2013 to May 2023, supported national parks throughout Gabon and included ranger activities. According to FWS officials, as of Nov. 2023, FWS was re-evaluating future awards for activities in Gabon given the Aug. 2023 coup in Gabon. According to a State press release, dated Oct. 23, 2023, pursuant to section 7008 of State's annual appropriations act, the U.S. suspended most U.S. assistance to the government of Gabon due to the military coup.

Appendix II: Agencies' Support for Ranger Activities in Africa and Asia, Fiscal Years 2020 to 2022

Implementing Partner	Number of Awards	Country	Total Ranger Activities
Wildlife Alliance Inc.	2	Cambodia	64
Tsavo Trust	1	Kenya	45
Bill Woodley Mount Kenya Company Limited	1	Kenya	33
Fauna & Flora International	2	Indonesia, Vietnam	23
Wildlife Division	1	Ghana	22
Endangered Wildlife Trust	1	South Africa	18
Wildlife Areas Development and Welfare Trust	1	India	17
Phub Dorji	1	Bhutan	16
Panthera	1	Thailand	5
Chelonee	1	Cameroon	4
African Aquatic Conservation Fund	1	Cote d'Ivoire	3
Dambari Wildlife Trust	1	Zimbabwe	3
Total	56	—	\$7,490

Legend: — = not applicable.

Source: GAO analysis of Fish and Wildlife Service (FWS) data. | GAO-24-106553

Notes: FWS provided estimated obligations for ranger activities within awards received by implementing partners for the period from fiscal year 2020 through 2022 because, according to FWS officials, FWS does not track ranger funding. According to FWS officials, ranger obligations include support for park ranger, patrolling, and other law enforcement activities. FWS considers park rangers as having a mandate for managing or patrolling protected areas. Patrolling is defined as scheduled field surveillance of a protected area to protect wildlife and to deter illegal activities. According to FWS officials, other law enforcement includes support to anyone who has the authority to carry weapons or make arrests. Dollars are rounded to the nearest thousand. Totals may not add up due to rounding.

^aAn interagency agreement with U.S. Agency for International Development funded this award.

^bThe Africa multicountry award supports efforts to combat wildlife trafficking in Nigeria and Cameroon.

State Awards with Ranger Activities

According to State/INL officials, its awards support various ranger activities, including ranger patrols within protected areas to detect and deter poaching, training for staff and rangers, and technology to support these efforts; activities to prevent corruption related to the illegal wildlife trade; support for intelligence capability and crime scene investigation; and similar activities for community-managed protected areas, including community-led or joint community-government patrols.

State obligated funds for 15 awards with ranger activities in 11 countries in Africa and Asia (see table 10). State provided funding for 13 awards in Africa, totaling about \$25,456,000, and two awards in Asia, totaling about \$1,134,000.

Appendix II: Agencies' Support for Ranger Activities in Africa and Asia, Fiscal Years 2020 to 2022

Table 10: Department of State Estimated Obligations for Ranger Activities in Africa and Asia, by Country, Fiscal Years 2020-2022

Dollars in Thousands

Country	Number of Awards	Total Ranger Activities
Africa (multicountry) ^a	4	\$8,644
Kenya	2	5,119
Mozambique	1	4,000
Democratic Republic of the Congo	2	3,499
Tanzania	2	2,192
Zambia	2	2,001
Nepal	1	622
India	1	512
Total	15	\$26,589

Source: GAO analysis of State data. | GAO-24-106553

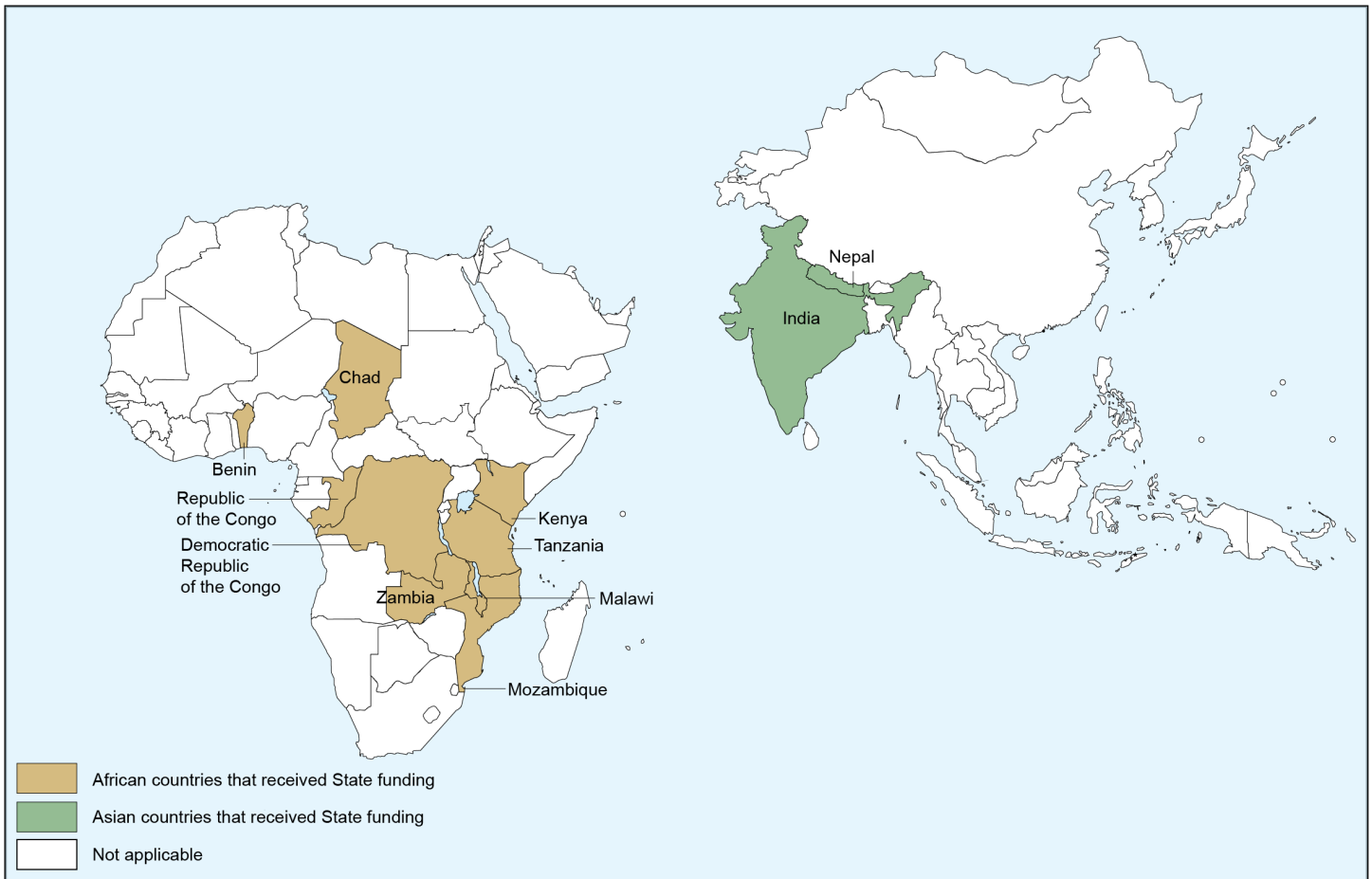
Notes: State's data represents estimated obligations for ranger activities within combat wildlife trafficking awards because State does not track ranger funding. According to State officials, ranger funding supports a range of activities, such as on-the-ground support to protected areas to reduce and deter poaching, which may consist of equipment and technology; and training of relevant staff, rangers, and community leaders to enhance ranger patrolling, intelligence gathering and analysis, and the detection of wildlife crime. Dollars are rounded to the nearest thousand. Totals may not add up due to rounding.

^aState did not break out ranger funding by country for the multicountry awards. These awards support activities to combat wildlife trafficking in Republic of Benin, Chad, the Democratic Republic of the Congo, Kenya, Malawi, the Republic of the Congo, Tanzania, and Zambia.

Figure 10 provides a map of the locations in Africa and Asia where State provided support for ranger activities.

Appendix II: Agencies' Support for Ranger Activities in Africa and Asia, Fiscal Years 2020 to 2022

Figure 10: Maps of Countries Receiving Department of State Awards with Ranger Activities in Africa and Asia, Fiscal Years 2020-2022



Source: GAO analysis of Department of State data; Map Resources (map). | GAO-24-106553

State provided funding to 11 implementing partners to carry out 15 awards with ranger activities in Africa and Asia. The Wildlife Conservation Society received the largest amount of funding, totaling about \$8,750,000 across five awards in Africa.

**Appendix II: Agencies' Support for Ranger
Activities in Africa and Asia, Fiscal Years 2020
to 2022**

Table 11: Department of State Estimated Obligations for Ranger Activities in Africa and Asia, by Implementing Partner, Fiscal Years 2020-2022

Dollars in Thousands

Implementing Partner	Number of Awards	Country	Total Ranger Activities
Wildlife Conservation Society	4	Mozambique, Tanzania, Africa (multicountry) ^a	\$8,750
African Parks Network	2	Africa (multicountry) ^b , DRC	4,659
Save the Rhino International	1	Kenya	3,642
Virunga Foundation	1	DRC	2,499
African Wildlife Foundation	1	Africa (multicountry) ^c	1,485
Wild Landscapes	1	Kenya	1,477
South Luangwa Conservation Society	1	Zambia	1,001
Frankfurt Zoological Society	1	Zambia	1,000
Southern Tanzania Elephant Program	1	Tanzania	942
National Trust for Nature Conservation	1	Nepal	622
Wildlife Trust of India	1	India	512
Total	15	—	\$26,589

Legend: — = not applicable.

Source: GAO analysis of State (State) data. | GAO-24-106553

Notes: State's data represents estimated obligations for ranger activities within combat wildlife trafficking awards in fiscal years 2020 to 2022 across Africa and Asia because State does not track ranger funding. According to State officials, ranger funding supports a range of activities, such as on-the-ground support to protected areas to reduce and deter poaching, which may consist of equipment and technology; and training of relevant staff, rangers, and community leaders to enhance ranger patrolling, intelligence gathering and analysis, and the detection of wildlife crime. Dollars are rounded to the nearest thousand. Totals may not add up due to rounding.

^aState did not break out ranger funding by country. Wildlife Conservation Society received two multicountry awards supporting efforts to combat wildlife trafficking in Democratic Republic of the Congo (DRC) and Republic of the Congo.

^bState did not break out ranger funding by country. This award supports ranger activities in Chad, the Republic of Benin, Malawi, Republic of the Congo, and Zambia

^cState did not break out ranger funding by country. This award supports ranger activities in Kenya and Tanzania.

Appendix III: Comments from the U.S. Agency for International Development



Kimberly Gianopoulos
Managing Director, International Affairs and Trade
U.S. Government Accountability Office
441 G Street, N.W.
Washington, D.C. 20226

June 27, 2024

Re:
Dear Ms. Gianopoulos,

I am pleased to provide the formal response of the U.S. Agency for International Development (USAID) to the draft report produced by the U.S. Government Accountability Office (GAO) titled, *Wildlife Trafficking: Agencies Should Improve Efforts to Protect Human Rights in Overseas Activities* (GAO-24-106553). The report has two recommendations for action on behalf of USAID.

The GAO recommends that USAID ensure that award implementers' funding activities both meet established timeframes to provide social safeguard plans, and also ensure the Agency receives periodic monitoring reports of the status of safeguard implementation, including steps taken to assess and ensure their effectiveness.

USAID steadfastly strives to better reduce social risk and the possibility of human rights violations in its programming to combat wildlife trafficking. To address GAO's recommendations, the Agency intends to standardize the social safeguard requirements for law enforcement support in parks and other protected areas.

The Agency will ensure that consistent timelines are established to provide social safeguard plans and that the Agency receives periodic monitoring on the status of those plans, including steps taken to assess and ensure these plans are effectively implemented. By doing so, USAID will formalize staff responsibilities and obligations.

USAID has zero tolerance for violations of human rights in its programs. The Agency remains vigilant against the potential of human rights violations in the context of its programming and continually seeks to reduce those risks. Missions are now required to conduct a Social Risk Initial Screening of the social impacts of their proposed activities to identify where more systematic social impact assessments may be necessary to adequately understand the social impact and/or unintended consequences of a new design; and to help Missions plan to mitigate and monitor potential adverse social impacts. This effort shows the Agency's continued commitment to avoiding, mitigating and minimizing social risk, including the potential for human rights violations in the context of its programming.

**Appendix III: Comments from the U.S. Agency
for International Development**

I am transmitting this letter and the enclosed comments from USAID for inclusion in the GAO's final report. Thank you for the opportunity to respond to the draft report, and for the courtesies extended by your staff while conducting this engagement. We appreciate the opportunity to participate in the complete and thorough evaluation of our work to combat wildlife trafficking and ensure effective conservation.

Sincerely,

Colleen R. Allen

Colleen Allen
Assistant Administrator
Bureau for Management

Enclosure: a/s

**Appendix III: Comments from the U.S. Agency
for International Development**

**COMMENTS BY THE U.S. AGENCY FOR INTERNATIONAL DEVELOPMENT ON THE DRAFT
REPORT PRODUCED BY THE U.S. GOVERNMENT ACCOUNTABILITY OFFICE (GAO), *Wildlife
Trafficking: Agencies Should Improve Efforts to Protect Human Rights in Overseas Activities*
(GAO-24-106553)**

The U.S. Agency for International Development (USAID) would like to thank the U.S. Government Accountability Office (GAO) for the opportunity to respond to this draft report. We appreciate the extensive work of the GAO engagement team, and the specific findings that will help USAID achieve greater effectiveness in Agency programming to combat wildlife trafficking in parks and other protected areas.

USAID has zero tolerance for violations of human rights in its programs, and is appalled by reports of intimidation and violence. We remain vigilant against the potential of human rights violations in the context of our programming and continually seek to reduce those risks. In May 2024 the Agency released an updated version of Automated Directives System (ADS) Programming Chapter 201, the primary body of operational programming rules and procedures for Agency staff. Missions are now required to conduct a Social Risk Initial Screening of the social impacts of their proposed activities to identify where more systematic social impact assessments may be necessary to adequately understand the social impact and/or unintended consequences of a new design; and to help Missions plan for, mitigate, and monitor potential adverse social impacts. This effort shows the Agency's continued commitment to avoiding, mitigating and minimizing social risk, including the potential for human rights violations in the context of its programming.

The draft report contains two recommendations for USAID's action:

Recommendation: The Administrator of USAID should take steps to ensure that implementing partners for awards with ranger activities meet the established timeframes to provide social safeguards plans.

USAID's response: USAID concurs with this recommendation and steadfastly strives to more effectively reduce social risk and the possibility of human rights violations in its programming to combat wildlife trafficking. The Agency commits to better ensuring implementers meet award specific timelines to provide social safeguard plans by standardizing processes and social safeguards requirements for law enforcement support in protected areas. This will continue and reinforce the integrated approach that staff have already been using and are familiar with to meet park and protected area social safeguard requirements by leveraging existing processes to ensure completion in environmental compliance procedures and documentation.

Recommendation: The Administrator of USAID should ensure that implementing partners for awards with ranger activities that require social safeguards plans include information in periodic monitoring reports for USAID on the status of implementation of project social safeguard

**Appendix III: Comments from the U.S. Agency
for International Development**

mechanisms and any steps taken to assess their effectiveness. This should include information on any issues encountered, resolutions and lessons learned.

USAID's response: USAID concurs with this recommendation. Adaptive management, a core principle in USAID's approach to effective programming, relies on periodic and continuous monitoring. By addressing this recommendation, USAID will better ensure its partners and managing staff are taking steps to understand issues that arise in social safeguard implementation, address those issues, and strengthen future programming through continuous learning. USAID intends to standardize its reporting requirements to ensure effective monitoring of safeguard implementation plan progress. This inclusion will also formalize USAID staff responsibilities and obligations to comply. These ADS requirements for parks and other protected area safeguards will ensure their consistent application across activities to combat wildlife trafficking and the global biodiversity crisis.

USAID affirms its commitment to ensuring effective monitoring and implementation of social safeguards in the Agency's efforts to support ranger activities in combating wildlife trafficking in parks and other protected areas.

Appendix IV: Comments from the U.S. Fish and Wildlife Service



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240

Kimberly Gianopoulos
Managing Director, International Affairs & Trade
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Ms. Gianopoulos:

Thank you for providing the U.S. Fish and Wildlife Service (Service) the opportunity to review and comment on the draft Government Accountability Office (GAO) report entitled WILDLIFE TRAFFICKING: Agencies Should Improve Efforts to Protect Human Rights in Overseas Activities (GAO-24-106553). The Service concurs with the four recommendations:

Recommendation 2: The Director of the Service should communicate guidance in Notices of Funding Opportunity (NOFO) for applicants for direct-funded awards with ranger activities on what information to provide to the Service on project social risks and any planned social safeguard mechanisms to address those risks. These safeguards may include community consultation and engagement, consideration of Indigenous Peoples and FPIC principles, human rights training for rangers and grievance and redress mechanisms.

Corrective Action: The Service concurs with this recommendation and since the initiation of this inquiry has established new requirements around information applicants must provide on social risks associated with proposed projects. Beginning in April 2024 all Division of International Conservation (DIC) and NOFO contain new standard Social Safeguard Framework language. This language outlines social safeguard requirements that must be met by any proposal that is recommended for funding, including a self-assessment by applicants of potential social risk for activities and inclusion of planned mitigation measures for activities. Safeguard mitigation measures expected of partners by the Service is now commensurate to the level of risk of proposed activities and acceptable mitigation is measured against the highest risk activities.

Additionally for organizations (often small, local non-governmental organizations) requiring additional financing to build social safeguard capacity, the NOFO budget narrative section now includes new text whereby applicants may request support in building organizational capacity for ongoing social safeguards implementation.

**Appendix IV: Comments from the U.S. Fish and
Wildlife Service**

The new NOFO text includes several other additions, including, but not limited to, new restrictions on funding for the physical resettlement of people (voluntary or involuntary) in consideration of vulnerable indigenous peoples and local communities (IPLCs).

Target Date: COMPLETE: The full NOFO template is included in this response with sections highlighted in blue identifying the new language. The Latin American Regional Program NOFO published on April 19, 2024, with this new language.
<https://www.fws.gov/media/latin-america-regional-program-funding-opportunity>

Responsible Official: Assistant Director, International Affairs

Recommendation 5: The Director of the Service should periodically update the “abuse of power” risk assessments of the Service conducts for direct-funded awards with ranger activities to analyze and respond to any changes in project human rights abuse risks and social safeguards.

Corrective Action: The Service concurs with this recommendation. In addition to new standardized safeguard language in the Service NOFOs requesting safeguards information from partners, additional tools are being developed to combat abuses of power and reduce the likelihood of gross human rights violations. These tools will be formally integrated through standard operating procedures and/or control sheets documenting completed assessments and will include a Safeguard Risk Assessment, a Social Impact Assessment and Courtesy Human Rights Vetting.

A link to the social impact assessment is available at [Social Impact Assessment for International Conservation | FWS.gov](#)

Our FPIC guidelines are available at [Statement and Guidelines on Free, Prior, Informed Consent | FWS.gov](#)

Target Dates: December 30, 2025

Responsible Official: Assistant Director, International Affairs

Recommendation 6: The Director of the Service to inform its risk assessments, should ensure that implementing partners for direct-funded awards with ranger activities include updated information in periodic performance reports on human rights abuse risks and applicable project social safeguard mechanisms. This should include information on any issues encountered, resolutions, and lessons learned.

Corrective Action: The Service concurs with this recommendation and has updated our notice of award terms and conditions to reflect new performance reporting on human rights abuse incidents and the efficacy of safeguard mechanisms.

**Appendix IV: Comments from the U.S. Fish and
Wildlife Service**

Recipients will be required to track and monitor the effectiveness of safeguard mechanisms and include a status report of implementation and monitoring practices in interim and final performance reports. Recipients must report any gross human rights abuse allegations, in connection with the project or within the project area, to the Service Program Officer in writing. These will be reflected in our next award cycle.

Target Date June 30, 2026

Responsible Official: Assistant Director, International Affairs

Recommendation 7: The Director of the Service should clarify requirements for implementing partners for direct-funded awards with ranger activities to report grievances or human rights abuse allegations to the Service in a timely manner.

Corrective Action: The Service concurs with this recommendation. The Service agrees it is essential for partners to have systems in place for IPLCs to report grievances and human rights abuse allegations. It is also essential that the Service International Affairs leadership accurately track reports of gross human rights violations and reports to the Department of the Interior Office of the Inspector General where appropriate.

The Service has updated our notice of award terms and conditions to clarify requirements for implementing partners to report grievances or human rights abuse allegations. These terms and conditions include a grievance redress mechanism requirement. These will be reflected in our next award cycle.

Target Date: June 30, 2026

Responsible Official, Assistant Director, International Affairs

Sincerely,

**SHANNON
ESTENOZ** Digitally signed by
SHANNON ESTENOZ
Date: 2024.06.18
13:54:50 -0400

Shannon Estenoz
Assistant Secretary
for Fish and Wildlife and Parks

Appendix V: Comments from the Department of State



United States Department of State
Comptroller
Washington, DC 20520

JUL - 1 2024

Jason Bair
Managing Director
International Affairs and Trade
Government Accountability Office
441 G Street, N.W.
Washington, D.C. 20548-0001

Dear Mr. Bair:

We appreciate the opportunity to review your draft report, "WILDLIFE TRAFFICKING: Agencies Should Improve Efforts to Protect Human Rights in Overseas Activities." GAO Job Code 106553.

The enclosed Department of State comments are provided for incorporation with this letter as an appendix to the final report.

Sincerely,

James A
Walsh Digitally signed by
James A Walsh
Date: 2024.07.01
13:54:57 -04'00'
James A. Walsh

Enclosure:
As stated

cc: GAO – Kimberly Gianopoulos
OIG - Norman Brown

Department of State Comments on Draft GAO Report

**WILDLIFE TRAFFICKING: Agencies Should Improve Efforts to
Protect Human Rights in Overseas Activities**
(GAO-24-106553, GAO Code 106553)

Thank you for the opportunity to comment on the GAO draft report, *“Wildlife Trafficking: Agencies Should Improve Efforts to Protect Human Rights in Overseas Activities.”* We appreciate the extensive work of the GAO engagement team, and the findings that will help the Department of State improve human rights monitoring in programs countering wildlife trafficking.

Recommendation 3: The Secretary of State should ensure INL develops internal guidance for officials who review social safeguards plans in applicant proposals regarding the social risks and social safeguard mechanisms they should consider. These safeguards may include community consultation and engagement, consideration of Indigenous Peoples and FPIC, human rights training for rangers, and grievance and redress mechanisms.

The Department concurs with the recommendation.

INL will coordinate with relevant experts in its Office of Knowledge Management (INL/KM) and those in the Bureau of Democracy, Human Rights and Labor (DRL), and the Office of the Procurement Executive (A/OPE) in developing this guidance.

Recommendation 8: The Secretary of State should ensure that implementing partners for INL awards with ranger activities that require social safeguards plans include information in periodic monitoring reports for State on the status of implementation of project social safeguard mechanisms and any steps taken to assess their effectiveness. This should include information on any issues encountered, resolutions, and lessons learned.

2

The Department concurs with the recommendation.

INL will include language in future INL awards with ranger activities requiring grantees to report on social safeguards in all quarterly progress reports. This requirement will be detailed in the award agreement for INL awards as well as funding opportunities in FY 2025.

Recommendation 9: The Secretary of State should ensure INL clarifies requirements for implementing partners for awards with ranger activities to report grievances or human rights abuse allegations to State in a timely manner.

The Department concurs with the recommendation.

INL will include language in future INL awards requiring partners to report grievances or human rights abuse allegations to State in a timely manner. This requirement will be detailed in the award agreement for INL awards as well as funding opportunities in FY 2025.

Appendix VI: GAO Contact and Staff Acknowledgments

GAO Contact

Kimberly Gianopoulos, (202) 512-8612 or gianopoulosk@gao.gov

Staff Acknowledgments

In addition to the contacts named above, Judith Williams (Assistant Director), Elisabeth Helmer (Analyst-in-Charge), Ingrid Ang, Sara Brinegar, Fritz Manzano, Sophia Sanchez, Pamela Davidson, Mark Dowling, Bahareh Etemadian, and Aldo Salerno made key contributions to this report.

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