



Offsetting human rights

Sexual abuse and harassment at the Kasigau Corridor REDD+ Project in Kenya | November 2023

From its onset, the trade in carbon credits has been dogged by controversies

Firewood sales along the road near Kasigau

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Introduction

From its onset, the trade in carbon credits has been **dogged by controversies**. The voluntary market in ‘nature-based solutions’, such as offset schemes that purport to **slow deforestation**, has attracted **scrutiny and criticism**.

Many such programmes are clustered under the term REDD+, short for Reducing Emissions from Deforestation and Forest Degradation in Developing countries.¹ Media outlets including *Bloomberg*, the *Financial Times*, and the *Guardian*, alongside major environmental groups and academics,² have exposed fundamental flaws in these programmes, and persuasively shown that they offer a false solution to climate change.³ While most critiques of REDD+ projects concentrate on the flawed carbon accounting methods underpinning them, less attention has been paid to the human rights abuses these projects give rise to.⁴

This report is the first in a SOMO series examining the human rights impacts of forest-based carbon offsetting. It focuses on one of the most celebrated carbon offsetting projects, which is widely praised for how it boosts local development and empowers women and youth: the Kasigau Corridor REDD+ Project ('Kasigau'), a carbon offsetting forest and wildlife conservation programme in southeast Kenya, founded and run by the United States company Wildlife Works.⁵

The Kasigau Corridor was the very first REDD+ project. Its first phase was approved in 2011 by Verra, a leading standard-setting organisation and credit issuer in carbon offset initiatives.⁶ Since then, dozens of corporations and development actors, including Microsoft, Shell, the International Finance Corporation of the World Bank, and the European Investment Bank have bought Kasigau-based carbon credits from Wildlife Works to offset their emissions.

Kasigau's credits are considered to be 'high quality', due to its branding as a community-centred initiative that "protect[s] nature by empowering people" through jobs and – to use industry jargon – 'community benefits', such as school bursaries, water tanks, and women's rights workshops (Box 1).⁷

Box 1.

High-quality credits

In the voluntary carbon market, the term 'high-quality credits' typically refers to projects that pride themselves on their pro-community approach and professed positive social impacts,⁸ especially for women.⁹ There is a growing market for such "charismatic carbon" and "morally-charged offsets", and their prices tend to be higher than those of 'ordinary' offsets.¹⁰

This report reveals that, contrary to its social and ethical branding, Wildlife Works is responsible for serious human rights abuses at the Kasigau project. Researchers working with SOMO interviewed 44 people who were current or former employees or members of the local community. This report is based on the testimonies we received from 31 individuals about gender-based abuses.¹¹ These interviews reveal widespread sexual harassment and abuse by senior male members of Wildlife Works staff and rangers. As this report will show, Wildlife Works has allowed or enabled a culture of serious abuse to persist at Kasigau and sold its products as ethical when they are anything but.

This report consists of five parts. The first part begins with a brief section on methodology and some words on terminology. It then traces the origins of Kasigau's image as an exemplary development initiative, and discusses the various corporate clients, development organisations and auditing firms that have enabled, popularised, and solidified this narrative. It also briefly examines the corporate structure of Wildlife Works.

The report's second part turns to SOMO's research findings. It presents the core findings of this investigation. This is followed by section three, which examines how the auditing firms that have assessed Kasigau appear to have completely missed the systemic abuse that went on at the project. Fourth, we discuss how Wildlife Works, its clients, and the auditing firms that have assessed the project have responded to SOMO's findings. Finally, we present conclusions and recommendations on how the company and its clients and auditors can each make meaningful reparations to the victims and the community at large, as well as recommendations for duty-bearing governments.



Research methodology

The initial interviews took place in June and July 2023 and were carried out in the Kiswahili language by **a team of local and international female researchers**. A first round of review and follow-up calls took place in August 2023, with the aim of ensuring that SOMO had **sufficiently anonymised** their testimonies in this report. A second round of follow-up interviews was carried out in October 2023. This last round of interviews focused on the internal investigation organised by Wildlife Works in response to SOMO's findings and asked **five company employees – two of whom we had interviewed before and three new sources** – about their experience with and perception of this investigation. Since most interviews were conducted in Kiswahili and later translated into English, many direct quotes from interviews are translations, some of them edited for clarity.

Designed to investigate the human rights impacts of the Kasigau Corridor REDD+ Project on local communities, especially on women, the interviews were semi-structured.

The all-female team of researchers has extensive experience of interviewing survivors of sexual harassment and violence, and is well versed in relevant research protocols, including issues around safety, security, confidentiality, and aftercare. SOMO deployed a team with this profile because we had received information that, approximately a decade ago, a researcher working with another institution at Kasigau had heard a range of anecdotes and stories about sexual harassment at Wildlife Works.

During all interviews, two interviewers were present, one of whom took notes. About half of the interviews were also audio-recorded. Recording was only done with the informed consent of the interviewee. Recorded interviews were first transcribed in Kiswahili, then translated into English. The accuracy of the transcriptions and translations was later verified by a member of the SOMO research team, and later by an independent reviewer. With the exception of the last round of interviews concerning Wildlife Works' internal investigation, the report findings were fact-checked by an external professional fact checker, who was given full access to all English interview notes and transcripts. The anonymity of the interviewees was protected during this process of review.

To protect the identity of our sources, we refer to both current and former Wildlife Works employees as 'employees'. We use the term 'senior member of staff' or 'senior manager' in relation to alleged perpetrators. These people occupied a range of senior positions in the company and – with the exception of one ranger – were always senior to the women we interviewed, and often in positions where they could exert influence over the women's working conditions.

Setting up these interviews, and gaining trust of interviewees to open up about the harassment and abuse they had experienced, witnessed, or heard about, required trust-building and repeated reassurances that we would anonymise the findings in our report and they would be able to see all text referring to their interview, including quotes, prior to publication. To ensure such anonymity, the testimonies in this report leave out certain details about people, locations, and incidents. The report also avoids lengthy quotes, as these would risk identifying the affected individuals.

For many survivors of gender-based abuse and harassment, factors such as trauma, fear, and a sense of shame make it hard to discuss their experiences.¹² This was certainly true for the people who suffered from the abuses discussed in this report, many of whom became emotional during the interviews.

Another barrier faced by the community in and around Kasigau in discussing problems at Wildlife Works is the power the company holds as an employer. Several of our sources expressed fear that speaking negatively about Wildlife Works could lead to retaliatory steps. These concerns probably played an important role in the decision of some women approached by SOMO's researchers to cancel interviews they had planned. For these reasons, it is likely that our research does not reveal the full extent of the Kasigau Corridor's problems.

The testimony we gathered comes from women directly affected – employees, a woman married to a male Wildlife Works ranger, and women living in communities nearby Kasigau – and from female and male employees who were witnesses or otherwise able to corroborate accounts.

Of the 11 former and current female employees we interviewed, 10 had been directly harassed or assaulted by senior members of staff¹³, and one had learned of this problem through colleagues.¹⁴ Of the male employees we interviewed, three had been victimised indirectly through their spouses:¹⁵ they claim that a senior member of staff has tried to extort sex from their spouses while they were at work.

Interviews with all 31 individuals are footnoted with the date range within which the interview took place, but without other details, in order to protect people's identity.

In addition to the fieldwork and interviews that underpin this report, researchers reviewed a wide range of documents, including those published by Wildlife Works, and social and environmental audit reports on the Kasigau project. Researchers also spoke with industry experts. SOMO's partner organisation, the non-governmental Kenya Human Rights Commission, acted as an expert reviewer of the report and authored the recommendations to the Kenyan government.

SOMO shared findings of this research with Wildlife Works and a number of its clients and auditors in writing before publication. Comments we received from them are reflected in the report.



Evolution of a green fairy tale: the Kasigau Corridor REDD+ Project

Amid **widespread concerns around the credibility and impact of nature-based carbon offset projects**, Kasigau in Kenya is widely portrayed as a powerful antidote to carbon credit sceptics. The Kasigau Corridor refers to a wildlife corridor in southeast Kenya that connects the national parks of Tsavo East and Tsavo West and provides a migration route for endangered African elephants and other wildlife. Dubbed “the heartbeat of Africa” by former US President Barack Obama for its “boundless space and breathtaking beauty”, the area is a well-known diversity hotspot.¹⁶

Located in Taita Taveta County, Kasigau is home to communities of primarily subsistence farmers who cultivate crops such as maize, green peas, and cassava and keep livestock such as goats, sheep, and donkeys. An estimated 360,000 people live in the villages surrounding Kasigau.¹⁷

The area's beauty stands in stark contrast to the poverty and climatic challenges faced by its population. Unemployment in the area is reported to be high, and increasing droughts are making it harder for people to feed their livestock and sustain their families.¹⁸

Access to land is a long-standing issue, as in several parts of Kenya. Much of the Kasigau project area is made up of ranches. Ranches are large areas of land established by the government during the 1960s and 1970s, mainly to facilitate cattle rearing. A relatively small group of elite people gained ownership of the ranches via long-term leases, which could be sold. When cattle production declined in the 1980s and 1990s, ranch owners were often in debt, and the ranches, which had frequently been overgrazed or mismanaged, were left idle. Local people from villages around the ranches used the idle land to graze their livestock and to gather wood for domestic use or charcoal production. This activity also contributed to degradation of the forest.¹⁹

The solution Wildlife Works offered to the challenges facing the area was to provide 'green jobs' to the local community, paying people to protect the local ecosystem. This narrative – of local livelihoods as the problem and carbon offsetting as a solution – has been the basis of much carbon offsetting hype. A closer examination of land access and ownership, and deep inequalities at Kasigau, offers a different perspective on the issues (see Box 4, p. 25).

The Kasigau project was conceived towards the end of the twentieth century. In the early 1990s, most ranches in Taita Taveta County were vacant or leased out for grazing. In 1998, the founder of Wildlife Works, Mike Korchinsky, bought 80 per cent of the insolvent Rukinga ranch (30,000 ha) and conceived of a business based on conservation and working with local communities. In 2009, Wildlife Works developed the Kasigau Phase I Project Design Document. The company also worked with ranch owners and community members to revive 13 neighbouring ranches that were affected by economic problems, as their buy-in was considered essential for large-scale carbon sequestration outcomes.²⁰

Of the roughly 350 jobs the company has created in the area, around 130 are as rangers, who criss-cross the area's roughly 2,000 square kilometres every day.²¹ Wildlife Works has set up multiple outposts (or camps) across the area, where rangers spend multiple weeks. According to Wildlife Works protocol, these rangers must be unarmed and must hand over to the local police anyone they find grazing livestock or gathering firewood or wood for charcoal – or give them a warning.²²

In addition to rangers, Wildlife Works also employs staff in an eco-charcoal factory, a tree nursery, and a sustainable clothing factory.²³ The company also runs a school nursery scheme and has installed water tanks in the area. In total, Wildlife Works claims that its project at Kasigau has improved the lives of more than 116,000 people.²⁴

As many corporations do these days, Wildlife Works likes to associate its operations with the United Nations Sustainable Development Goals (SDGs).²⁵ A key SDG it claims to contribute to is SDG 5 – women’s empowerment and gender equality. According to the company, it does so by hiring women in positions traditionally reserved for men, such as rangers, and by running various ‘women’s empowerment’ groups.²⁶

Endorsements and audits

In putting Kasigau on the map as one of the world’s most ethical carbon offset projects, Wildlife Works has benefited from the endorsements of influential actors in the business, finance, development, and environmental sectors. These include the European Investment Bank, the International Finance Corporation (IFC) of the World Bank, and the UN Environment Programme (UNEP). In championing Kasigau, many of these organisations highlight Kasigau’s positive impact on gender equality and how the project boosts local development.²⁷

Arguably most crucial in this regard has been the backing of Verra (“the world’s leading standards setter for climate action and sustainable development”; see the Introduction).²⁸ Under Verra’s oversight, Kasigau has managed to repeatedly obtain certification under the Verified Carbon Standard (VCS), the Climate, Community and Biodiversity Standards (CCB), and the SD VISTa (Sustainable Development Verified Impact) standards.²⁹ The latter two certifications are purportedly granted only to projects that boost gender equity and socioeconomic development, and have reportedly enabled Kasigau credits to “sell at above average market value”.³⁰

Aside from allowing Wildlife Works to sell credits on the Verra platform based on these prestigious labels, Verra has repeatedly endorsed Kasigau in more public ways. It has touted the project as “proof positive” that market-based solutions to climate change and poverty “can engage communities in changing the economic incentives that drive deforestation”.³¹ “Not until this project came on board”, former Verra CEO David Antonioli said in 2014, “did anyone have any good examples [to] point to and say ‘Here’s how it works’.” Kasigau, Antonioli suggested, changed that.³²

Between 2011 and 2022, auditing teams from six different firms visited Kasigau and interviewed employees and community members about the social impacts of the project and working conditions at Wildlife Works.³³ As part of these audits, auditors had to check whether recruitment practices were fair and if Wildlife Works had provided an effective grievance mechanism for community members and employees to lodge complaints. A review of the audit reports issued by these firms shows that the auditors found no major problems and, in all cases, gave the company a clear pass. Often, they simply repeated marketing claims made by Wildlife Works, citing Kasigau’s “extraordinary”³⁴ and “overwhelmingly”³⁵ positive impacts on the local community and the company’s commitment to “[m]entoring and training of employees”.³⁶

Box 2.

Auditing the carbon offset sector

Verra requires that companies selling carbon credits through its platform have their carbon offsetting projects audited by one of its approved, and usually for-profit, environmental auditing partners. The task of these auditors – also known as validation and verification bodies (VVBs) – is to verify that the carbon accounting methods used to calculate the offsets check out, and that the projects meet Verra’s social safeguards and cause no harm to the communities where they operate.

This auditing system resembles the social auditing that multinational companies implement to monitor conditions in their supply chains. In fact, auditing giants such as SCS Global Services, TÜV SÜD, SGS, and RINA undertake both kinds of audits. Since the auditing industry is largely unregulated, and auditors are hired by the same companies whose practices they scrutinise – creating a clear conflict of interest and commercial incentive for auditors to go soft on their clients – the resulting audit reports can present a distorted picture of the reality on the ground.

The weight of these audits is significant. As Jens Friis Lund, a professor of political ecology at Copenhagen University, explained to SOMO: “The legitimacy of the entire offsetting system depends, to a huge extent, on the auditors’ green light.”³⁷ Indeed, many of the client companies that buy Kasigau credits cite the project’s VCS and CCB certification, and that it has been audited by independent auditing firms, as evidence of the project’s social impacts.³⁸

Clients

The image of Wildlife Works as a company deeply devoted to climate justice, poverty alleviation, and gender equality has made its Kasigau-based credits popular among corporations keen to demonstrate their green credentials and social purpose to clients and employees. This has, by the company’s own account, enabled Wildlife Works to charge a premium for its credits.³⁹ Dozens of multinational corporations have now purchased carbon offsets from Kasigau. These include banks such as Barclays and BNP Paribas and consultancy firms such as McKinsey & Company. Within the fashion industry, Kasigau’s carbon credits have been purchased by Kering, the French owner of Alexander McQueen, Balenciaga, Bottega Veneta, Gucci, and Yves Saint Laurent. Other companies that have invested in or bought Kasigau-based credits include Audi, Netflix, Microsoft, and Shell.

The narrative of Kasigau as an ecological and women’s empowerment success story is repeated in the sustainability reports and on the websites of some of these companies, which also cite the project’s contribution to the SDGs as a key reason for purchasing the credits. Among them are BNP Paribas and McKinsey,⁴⁰ which highlight the project’s contribution to SDG 5 through women’s employment and entrepreneurship.

None of these clients have gone as far in promoting Kasigau as Netflix, whose online 12-minute promotional video about the project features former US President Obama. The promotional clip is opened by Obama, whose general comments about the importance of wildlife and biodiversity – drawn from a Netflix series on national parks – are integrated into an advertisement for Wildlife Works and Kasigau that highlights how the project supports the local community and helps women learn, work, and find “renewed purpose”.⁴¹

Box 3.

Wildlife Works’ corporate structure

Wildlife Works operates through a web of companies, and at least one non-profit entity,⁴² scattered over the globe. The founder and director of Wildlife Works, Mike Korchinsky,⁴³ is also a co-director of Everland Marketing (Everland LLC),⁴⁴ Wildlife Works’ marketing arm.⁴⁵ Though Wildlife Works is officially headquartered in Mill Valley, California, both Wildlife Works Carbon LLC and Everland LLC are incorporated in Delaware.⁴⁶

Delaware is known as a corporate secrecy jurisdiction,⁴⁷ which makes it unsurprising that financial data on both companies are hard to come by. What we do know is that, in July 2021, trading house Hartree Partners announced it was investing in Wildlife Works in a deal facilitated by Everland aiming to generate US\$ 2 billion in private-sector investment for 20 new projects wherein, similar to Kasigau, communities can protect biodiversity and forests from deforestation.⁴⁸



Livestock near Kasigau

The reality behind the fable: systemic sexual harassment and abuse

SOMO's research identified **widespread sexual harassment and abuse** of female employees and other women linked to Kasigau Corridor project, perpetrated by **senior male staff members** of Wildlife Works. This harassment and abuse happened in a range of contexts as detailed in the following pages. Our research indicates that the company's abusive culture has persisted for **a decade or more**. The interviews conducted by SOMO researchers cover a variety of incidents that occurred between 2011 and 2023.

Sexual harassment of female employees by senior staff members and rangers

In approaching their targets, the alleged perpetrators often seek out moments at the workplace when no other colleagues appear to be around. Sometimes they use only words to pressure female colleagues into sexual acts – for example, by suggesting they meet up at a certain hotel or another off-site location “in town”.⁴⁹ Often they promise the women benefits, such as preferential treatment and promotion, in exchange for sex.⁵⁰

“I will do anything you want if you just sleep with me,” one woman recalled a senior manager telling her while alone with him in a field office one day.⁵¹

Another woman recalled how her manager told her that he would “defend” her with “whatever you go through at the company” if she agreed to meet him at a hotel. “Then the next day,” she told us, “he would stand in front of me and ask, ‘Have you thought about what I told you?’” It made her feel frightened, she said, “to be alone in a room with him ... because he was very powerful” and made it clear he would not accept her “denying him this thing”.⁵²

More coercive and physical tactics are also common. Women gave numerous examples of unwanted sexual touching, groping, and physical assaults in settings such as the office, changing rooms, and vehicles. This included the touching of breasts and “private parts” and tearing women’s clothes.⁵³

One woman worker recalled how, less than two years ago, a senior manager suddenly locked the door to the workspace they were in and began touching and groping her. “I was really scared,” she told SOMO, “and told him to stop.”⁵⁴ Angered at her protest, he reminded her “that I would lose my job if I did not agree to what he was telling me”.

In addition to sexual harassment and assault, SOMO also received testimonies of attempted rape. In one instance, a ranger employed by Wildlife Works attacked another employee while she changed clothes in one of the company’s changing rooms. According to the woman, this ranger had verbally harassed her in the changing room before, but this time he got violent with her.⁵⁵ He “tried to undress” her against her will and “pushed [her] to the floor” before she managed to escape. Two other interviewees were familiar with this incident. They had heard about the assault from colleagues, who had witnessed parts of it, and were later given details by the victim herself.⁵⁶

This same male ranger was named by another woman as the person who had once assaulted her while they were alone at one of the Wildlife Works rangers’ camps.⁵⁷ The resulting struggle, she said, left her with a torn bra and T-shirt. The accounts of these women underline the vulnerable position female rangers can find themselves in when left alone with male colleagues at the camps.

Some women described incidents when the pressure to have sex with a more senior male colleague came not only from the person demanding sex but also from one or more of his colleagues.⁵⁸ In one such incident, a woman recalled how turning down her manager’s request to ‘pull her panty’ (‘kuvua suruali’ in Kiswahili, an often-used colloquial term connoting sex) triggered intimidation by another senior

male manager, who demanded to know why she “was refusing” her manager.⁵⁹ Women are “treated as sex objects”, said one woman summarising the position of women in the company, “but nothing happens because they [the perpetrators] intimidate everybody”.⁶⁰

Among the 13 male employees we interviewed, the abuse of female colleagues was well known.⁶¹ When asked whether Wildlife Works treats women equally to men, most did not hesitate to explain that women “are routinely taken advantage of”⁶² and “sexually harassed”,⁶³ “have to sleep with their bosses before getting that job”,⁶⁴ or “retain their position through sexual activities with [a senior staff member]”.⁶⁵ One ranger voiced the concern and frustration among these men well when he told SOMO: “It’s so cruel ... I can’t allow my sister or wife to work at that company because the things that will happen to her there can affect her for the rest of her life.”⁶⁶

Combined, these accounts paint a picture of Kasigau as a workplace where influential senior male members of staff participate in, enable, and condone a culture of sexual harassment and abuse, leaving women employees in a profoundly and structurally unsafe work environment.

Sex for jobs

Whereas the majority of testimonies involved the abuse of employees, SOMO also received reports that suggest certain senior male members of staff also target female recruits by demanding sex in exchange for jobs. While we did not interview any women who said they had experienced this abuse, several employees told SOMO that such ‘sex for work’ abuse is common practice.⁶⁷ They typically brought up this issue in response to a question on how Wildlife Works recruits staff.

For example, a middle-aged female employee recalled how a young female colleague – the breadwinner of an impoverished family – had confided to her that she had slept with a Wildlife Works manager to get the position.⁶⁸ “It was never by force,” she reportedly told her older colleague, stressing that she was not raped. “He was like, if you want the job faster, you come sleep with me and I give it to you on a silver platter ... You are the one to decide.” The reason why “some women give in [to such propositions] even before coming for the interview”, another female employee explained, is that “they are desperate for the job”.⁶⁹

While bribery is not the subject of this report, in speaking about Wildlife Works’ recruitment practices, several interviewees noted that, whereas female job seekers are vulnerable to sexual harassment, male job seekers are sometimes asked to pay senior Wildlife Works staff a fee to secure a job.⁷⁰ Referring to the situation and women’s experience, one male respondent said, “if you don’t have money, you [can] pay with your body.”⁷¹

Speaking on this same topic, another male worker recalled a dramatic scene at the office. He said that a middle-aged woman had entered the workplace “shouting” that a certain senior member of Wildlife Works staff had “used her daughter” and now, to her great distress, had failed to come through with the job he had promised her in return.⁷²

**“If you want the job faster,
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**“I will do anything you want
if you just sleep with me”**

**“I was really scared and
told him to stop”**

**“If you don't have money, you
[can] pay with your body”**

These incidents could not be verified directly with affected individuals. But the fact that reports of this form of abuse came up repeatedly in our interviews underpins one of the key findings of this research: that predatory men within Wildlife Works are able to exploit the company's power as a large employer in an area marked by poverty, and that they abuse this power to coerce women into abusive sexual relationships.

Retaliation for refusing sex and reporting assault

Whereas 'pulling your panty' can reportedly lead to preferential treatment and, through benefits and promotion, may enable some women to (temporarily) protect their families from poverty, refusing sex, on the other hand, can lead to penalties.

Women who refuse to give into sexual demands are subjected to verbal insults. Among those reported to us were use of terms such as "cow", "primitive", "good for nothing", and various sexualised slurs.⁷³ We also received testimony about bullying and intimidation. For example, according to reports received by SOMO researchers, perpetrators use threats of demotion or dismissal to coerce their victims into submission. In one such example, a woman spoke of the fear she felt when she was told by her assailant, after fending him off during a car ride, that "playing hard to get" would make it "impossible to get a promotion", and that he could "get her sacked" if he wanted to.⁷⁴ Another woman spoke of the "hatred" her manager levelled at her after she had told him she did not want to "mix work and love", and how this ultimately led him to demote her to a more junior and lower-paid position.⁷⁵

These practices are apparently so entrenched that several of the men we spoke with brought them up as a concern in their interviews.⁷⁶ As one explained, when women "say no ... that's the beginning of their problems ... He won't have anything to do with them and will tell them their work is not up to standard."⁷⁷ Similarly, another male employee said that "when a lady doesn't give in, hostility checks in"; she might be "assigned a lot of work ... barred from trainings or seminars ... denied promotions ... and talked to badly".⁷⁸

Interviewees also gave examples of where an alleged perpetrator denied his victim basic rights and benefits, including leave days, or tried to block her scheduled salary rise.⁷⁹ As one woman put it, if you refuse to 'lower the flag' (another euphemism for sex) "they will look for problems for you" and try to ensure that, when "you have an issue and need help ... no one will help you out".⁸⁰ Multiple interviewees gave examples of women who were fired because, according to them, they refused to have sex with a senior manager.

Rejecting the sexual harassment of senior staff members, then, leads women to "live and work in fear", as one of them phrased it, "because we can be dismissed at any time without good reason".⁸¹

Female rangers face different retaliatory risks than staff in other Wildlife Works departments. They might, for example, be "posted in [far-away] areas with hardship conditions", as one ranger explained,⁸² or demoted to a role of "watchman", with reportedly lower status and pay.⁸³ Several female rangers told us that a key perpetrator has demanded sex from them in return for permission to take time off and leave the camp.⁸⁴ When women refuse him, "they have to stay in the bush for a long time" without time off.⁸⁵

This practice was known among four male rangers SOMO interviewed.⁸⁶ They heard this from some of the women who this happened to and, in one case, from the alleged perpetrator himself, who, according to our respondent, would “brag” about it to him. “It was very painful,” this ranger told SOMO, “and it made me feel powerless, but what I could I do? He [the alleged perpetrator] is too powerful. I could only keep quiet.”⁸⁷

Women’s testimonies suggest that retaliation is sometimes carried out by more than one person. The perpetrator most consistently named as an abuser is widely understood to instruct some of his male colleagues to deny basic entitlements and favours to those who have rejected him. Examples given include blocking women’s forthcoming promotion and denying them company transportation when they need to visit a clinic or transport heavy food items to their home.⁸⁸ SOMO researchers were given several detailed examples of retaliation that we have not included in this report, because the specific accounts would risk revealing the identity of the women.

Alleged targeting of rangers’ spouses

According to nine people we interviewed – mostly male rangers – the senior staff member most consistently named as an abuser frequently pursues sexual relations with the wives of junior male colleagues. In their telling, this senior individual isolates his targets by deploying their husbands far away from their home for extended periods of time, and then extorts sex from them.⁸⁹

These women, one respondent explained, may be told that “I’m the one who gives your husband work” and that “this job might end” if they refuse to sleep with him.⁹⁰ Afraid and intimidated that their husbands might lose their jobs, “some sleep with [the alleged perpetrator] to secure their jobs”, one ranger said.⁹¹ The husbands of these women are, according to the rangers we spoke to, often rewarded with promotion, or penalised with demotion, based on whether their wives succumb to the pressure.⁹² As one ranger phrased this extortionary practice, “[Y]ou pay for your promotion with your wife.”⁹³

SOMO spoke to three male rangers who say their wives were subjected to this form of harassment⁹⁴ – one of whom succumbed to the pressure⁹⁵ – and one woman who has experienced it herself.⁹⁶ The five other interviewees familiar with this practice had heard about it from colleagues who were victims of this practice.

Multiple rangers noted that this “cruel practice”⁹⁷ is loaded with shame and trauma for both the men and women affected. In the words of one ranger close to multiple victims: “These are things that a man ... he can’t talk about this ... most of them don’t end up exposing these things out of shame.”⁹⁸ This helps explain why some rangers, during their interviews with SOMO, initially told us they had merely heard about these abuses, to only admit by the end of the interview that, in fact, they had been talking about their own wives and lives.

According to these men, the perpetrator began harassing their wives through phone calls, and sometimes unannounced visits to the women’s homes, when their husbands were away (deployed in a camp in the wild). “She told me he told her she was beautiful and asked her if she wanted a job,” one said.⁹⁹ “We did not know what to do,” he added, “because [the perpetrator] has so much power in the company.”

SOMO interviewed a woman who has experienced this harassment first-hand. She told SOMO:

“When [my husband] was away working in the field, [name redacted] started making calls at very odd hours of the night telling me that he wants to come to my house at night. He told me, ‘You see, now I have promoted your husband, it is time to pay me back’ ... I was really afraid because ... if he keeps calling me my husband might think I have a relationship with him and my marriage is at risk.”¹⁰⁰

While this marriage survived the abuse, SOMO also interviewed a ranger¹⁰¹ who decided to divorce his wife after six years of harassment by a senior male staff member. His story is worth retelling in some detail.

According to this man, he got married about a decade ago to a woman who was his colleague at the time. Soon after they got married, he found text messages on his wife’s phone from the alleged perpetrator, suggesting an intimate relationship. According to this ranger, when he confronted his wife, she told him she had had sex multiple times with their senior male colleague, but that she felt she had no choice. According to this man, “He [the alleged perpetrator] had told her that, ‘If you don’t sleep with me, I will make sure you will not work in this company’.”¹⁰²

The abuser placed similar pressure on her husband. “One day I asked for permission to leave the bush and go home,” he told us, “and he told me I would only go if I leave that lady [his wife].” On other occasions he would “tell me, ‘If you want to continue with the job and be in a good place at work, you leave her’.”

Once the ranger’s wife stopped sleeping with the abuser, the couple were not fired, as they had been threatened, but their lives at work were made more difficult through retaliatory steps similar to what SOMO has heard about from others. These measures reportedly included the denial of salary increments or of permission to leave, or to attend work events such as seminars, and denial of permission to move to a different company department.¹⁰³

Then, a few years later, in 2018, the harassment began again. The ranger was told, “If you don’t leave this woman, I will make sure I deal with you”, and he decided to leave his wife. “I just did not want to go through it all again,” he told us, “so to secure my work, I decided to leave her.”

Another ranger close to the couple recalls how “she did not want to speak about what was done to her, but she cried a lot. She had a look on her face that made it seem like something had been done to her.”¹⁰⁴

Conversations with other rangers suggest this practice is widespread and has ruined several marriages and lives.¹⁰⁵ A grievance that consistently comes up in these stories is that wage increments are believed to be granted or withheld on the basis of whether the wives succumb or not.

Humiliating and degrading treatment of female community members by rangers

In addition to the abuse of positions of power to sexually assault, harass, and extort sex from women workers, SOMO's researchers received testimony from five female members of local communities who had experienced humiliating and degrading treatment by Wildlife Works rangers while looking for firewood on Kasigau's protected lands.¹⁰⁶ These women are part of a broader group of local people depicted by Wildlife Works as responsible for deforestation when they fetch firewood for domestic use or to sell as charcoal or graze their livestock in protected areas.

The marketing materials and project documentation of Kasigau reveal a tension between these community members and the company. This is because, in addition to catching poachers, Wildlife Works' business model depends, rhetorically at least, on its ability to stop community members from gathering firewood, making charcoal, and grazing their livestock on protected lands. In fact, a central pillar of the company's sales pitch to clients is that, by purchasing Kasigau-based carbon credits, they help to fund the Wildlife Works rangers who surveil the local population and intervene when they spot any violations.

Paradoxically, this narrative holds impoverished people responsible for climate breakdown, while championing the companies that are actually fuelling the climate crisis. This demonisation of local, impoverished communities is not limited to Kasigau or Wildlife Works. Rather, it is exemplary of the wider REDD+ model that Wildlife Works helped to pioneer and popularise.¹⁰⁷

While the promise of Wildlife Works to provide the local community with alternative, 'eco-friendly' livelihoods is appealing, in reality only a fraction of the local population can land such jobs. This means that thousands of others, who are dealing with prolonged drought, the rising cost of living, and high unemployment, are left with few alternatives other than to fetch firewood or graze their livestock in the Kasigau project areas. In explaining why they sometimes collect firewood, women said their use and sale of firewood and charcoal help them cover their families' basic needs, such as children's school fees and food.

Testimonies we received from local women reveal how the tension and power asymmetry between Wildlife Works and local communities plays out on the ground, and the aggression and abuse it has given rise to.

Women we interviewed described several recent incidents when, as they searched for and collected firewood, Wildlife Works rangers spotted them and told them to stop.¹⁰⁸ The ensuing encounters with the rangers left them traumatised, humiliated, and in some cases in physical pain. On each of these occasions, the rangers subjected the women to hours of humiliation and abuse, forcing them to kneel on the ground for three hours or longer.¹⁰⁹ The women understand the instruction to 'kneel down' ('kushirutisha kupinga magoti kwenya sakafu kavu' in Kiswahili) as a tactic to humiliate and inflict physical pain and injuries on them, and it appears to be a common way of punishing those who fetch firewood or graze their cattle. "We cried and cried," one woman recalled, "but there was no mercy."¹¹⁰

Several women recalled how rangers had hurled explicitly sexualised insults and threats at them. In one instance, a ranger had ordered a woman to “take off your clothes... and f*** me (‘nitatoa suruali unitombe’ in Kiswahili).¹¹¹

Another woman said a ranger had sexually assaulted (tried to rape) her one early morning in February 2023.¹¹² She had woken up early that day to fetch firewood in the forest, intending to sell it to pay for her daughter’s school fees. “All crops from my farm have been destroyed by wild animals,” she told SOMO, “so I am left with nothing.” But in the process of gathering the firewood, she ran into a team of Wildlife Works rangers. According to the woman, one of the rangers “held her hand” as he forced her to kneel down. Then, “when I looked up, he had exposed [his erect penis]” and “was ready to assault me”. The only reason he did not do so, she believed, was that one of his colleagues recognised her and told the assailant to stop, apparently fearing that their connection could lead to trouble.

The women’s stories fit concerns voiced by several male and female rangers during their interviews around the behaviour of some of their male colleagues towards community members. These rangers had either witnessed how certain rangers abused women or heard stories about such aggression.¹¹³ One of them noted that “people in the community fear the rangers” but they “don’t feel safe to go to the head office to report violent behaviour”.¹¹⁴

A female ranger recalled an incident where a male colleague, who seemed to mistakenly believe he was alone with his victim, attempted to assault a community woman he found grazing her livestock near the village of Mwagwede.¹¹⁵ The ranger recalled intervening to prevent the assault and escorting the woman home and speaking to her family. The main reason why the victim and her family did not make a complaint, according to this female ranger, was that they were afraid this would get them “into trouble”¹¹⁶ with Wildlife Works and disqualify them from potential future benefits, such as school bursaries. When approached by SOMO, the woman in question initially agreed to be interviewed about the incident but later cancelled the appointment. This is indicative of the power Wildlife Works wields in the area.

In another incident, a female ranger recalled that a woman from a nearby village came to the office to report how the same ranger referred to in the incident above had assaulted her. However, as far as she knows the senior male staff member to whom she reported the attack – a ranger who is widely identified in our interviews as a key perpetrator – did not act on her report.

Risk of HIV transmission

Multiple interviewees expressed concern about the level of HIV transmission they believe is occurring due to the conduct of some Wildlife Works senior staff.¹¹⁷ One female employee said her fear of contracting HIV contributed to her decision to reject the sexual advances of a senior staff member. As she recalled thinking at the time, “If I sleep with [him], I will not live a long life ... I would die from [his] disease.”¹¹⁸

While SOMO cannot verify any information on HIV status, the risks expressed to our researchers are realistic concerns given the context described at Kasigau. Wildlife Works bears responsibility for the risks to people coerced into sexual relations with men working for the company, who appear able to abuse their positions without restraint or accountability.

Attempts to report and barriers to reporting sexual abuses

Several women we spoke with have attempted to report abuses to management. Two female rangers who had been assaulted by rangers at a Wildlife Works camp said they reported the incidents to management but found no support.¹¹⁹ One of them told SOMO how she reported the incident “without fear” to a senior male member of staff but that, as time went by, she came to realise no action would be taken.¹²⁰ The other female ranger claimed her manager began to bully her after she reported a violent incident at camp. Her allegation was supported by two other employees, one of whom had witnessed the bullying, while the other remembered her speaking about it.

Such testimony strongly indicates that senior management of Wildlife Works must have been made aware of allegations of abuse, at least in some instances.

At the same time, however, people have strong reasons *not* to report abuse. Our interviews point to two main reasons why many instances of sexual harassment and assault of women employees and community members in and around Kasigau probably go unreported.

Fear of retaliation is, according to our interviews, a powerful barrier to reporting abuse. Many female employees we interviewed worried, based on their own experience or that of people they know, that reporting abuse to senior managers is unlikely to create positive change but will rather lead to bullying, intimidation, or even dismissal.¹²¹ Several women said that reporting abuse is pointless, because of the close connections between key perpetrators and their influential positions within the company. These close connections contributed to a widely shared perception among interviewed employees that there is no mechanism whereby people can safely report problems in a way that results in effective action.¹²²

A second barrier to reporting abuse is shame. The women SOMO interviewed said they had refused to give into the sexual demands of male rangers or company managers (although, as their accounts demonstrate, several were subjected to physical assaults). But some noted that many other women had, at some point, succumbed to the pressure. According to these women, the sense of shame about what happened to them made it hard for them to speak out.

As one employee explained: “This sexual abuse, it’s out in the public, but those meant to talk are afraid.”¹²³ “People can’t talk,” another employee said; “they can’t talk because they are embarrassed.”¹²⁴

Widespread, known, and systemic abuse

The individual accounts of women who were subjected to sexual harassment and abuse were, as we observe above, supported by the testimony of others. Both Wildlife Works employees and community members told researchers they were aware of specific incidents, either as witnesses or because they had been informed about the events. As we have noted, male employees we interviewed stated that abuse of female colleagues was well known across the company.

These testimonies, which cover a variety of incidents between 2011 and 2023, make clear that male perpetrators' abuse of power is systemic and has been going on for years, and that senior managers of Wildlife Works at Kasigau are aware of these issues. In fact, the company culture of sexual extortion, assault, and humiliation of women persists because management accepts and enables it.

Box 4.

Uneven land tenure and resource use restrictions at Kasigau

The Kasigau Corridor REDD+ Project is a good illustration of the intricate and multifaceted relationship between land tenure and exclusion in the context of forest conservation initiatives. While the project prides itself on combating climate change by incentivising dryland forest conservation, its implementation exposes the unaddressed realities of historical land tenure arrangements that reinforce the exclusion of local communities – the majority of the land users in the project area.

Land tenure issues in the Kasigau Corridor can be traced back to the colonial period when Indigenous communities faced displacement and dispossession of their ancestral lands due to exclusionary policies. The legacy of these injustices has persisted into the present day, creating a major imbalance between land users and landowners. The Kasigau project has therefore incurred criticism for exacerbating existing land tenure imbalances and the associated erosion of customary livelihoods.

The exclusionary aspect of Kasigau highlights the challenges marginalised communities face in legitimately participating in and directly benefiting from conservation efforts. While the project has implemented various community-oriented initiatives, the land use restrictions it has imposed are worsened by the fact that, without formal landownership, direct benefits from REDD+ are restricted to a minority elite. This renders the majority of community members residual claimants of indirect benefits barely implemented at scale.

A failing audit system

The abuses we describe in this report are first and foremost **a failure of oversight** on the part of Wildlife Works. But they also illuminate the **serious limits of the auditing system** that is supposed to check that carbon offset projects meet the requirements of Verra's standards.

The auditing firms that visited Kasigau over the years **claim to have interviewed** dozens of employees and community members about working conditions, recruitment processes, the broader impact of the project, and the effectiveness of the company's grievance mechanism. Yet, judging by the content of their verification reports, they appear to have **completely missed the systemic abuse** that went on – even though, as SOMO's findings show, this was widely known among employees and community members **for many years**.

Instead, these audits found that the project had “overwhelmingly ... positive impacts to the local communities”,¹²⁵ was “highly unlikely to result in any net negative impacts on local stakeholders”, and was committed to “equal opportunity employment”.¹²⁶

While this failure on the part of audit companies is shocking, it is far from surprising in light of the inherent conflict of interest in the business model of social and environmental auditing. Audit firms are hired by the entities they audit. Under Verra’s oversight system, project developers such as Wildlife Works hire their auditors directly in an arrangement that creates the same perverse commercial incentive that characterises the wider auditing industry, which is known for rewarding leniency.¹²⁷ This conflict of interest has led to dangerously misleading reassurances around the safety and well-being of people involved in and affected by Wildlife Works’ Kasigau operations.

In 2023, as part of wider research on carbon offsetting, SOMO interviewed several social and environmental auditors who admitted that the structural incentives built into the auditing system for carbon offsetting limits auditors’ ability to seriously investigate human rights concerns at offsetting projects. One of these auditors had assessed the Kasigau project. They told SOMO they had heard disturbing stories of sexual harassment and abuses during their conversations with staff.¹²⁸ This auditor, who spoke on condition of anonymity out of fear of retaliation, recalled being told about an incident where a woman employed by Wildlife Works had asked for an advance on her salary and was told that “she had to ‘earn it’ by providing sexual favours”. In another incident, a woman had allegedly been “pressured repeatedly to sleep with a more senior colleague”. The auditor said they had tried, but failed, to get interviewees to speak about these and other problems on the record, but that staff members

“and especially junior staff seemed unable to speak freely. I had the impression that they had been told what to tell us and were afraid to defy these instructions. While I tried to convince them that they could share problems with me, I left those interviews feeling they were afraid to open up.”

Another reason why this auditor believed their team had failed to capture the problems at Kasigau was that “local communities who benefit from project carbon revenues are less likely to share such issues, as doing so may risk the continuation of project benefits”.

The testimony of this auditor, who spoke to us because of deep concern about the situation, illustrates how the commercial and power dynamics within the offsetting industry “limit the level of investigation” auditors can apply.

SOMO has written to the auditing companies it identified as having audited the Kasigau project. At the time of finalising this report for publication, only SCS Global had responded. The company stated that they “stand behind the audit procedures implemented during this assessment” and that “At no time during the audit were comments or allegations about sexual harassment or assault made by stakeholders to the assessment team.”

SCS does not address the fact that adherence to these standards appears to allow serious allegations of sexual harassment and abuse to occur without being detected, whilst the audit can still, as described earlier, provide a glowing picture of the project.

SOMO will publish further analysis of the auditing of the Kasigau project in due course.



Firewood sales along the road near Kasigau

Company responses

Wildlife Works' investigation

Internal investigation

In early August 2023, SOMO sent a letter to Wildlife Works that summarised our research findings and asked Wildlife Works to take action.¹²⁹ In response, Wildlife Works hired a Kenyan law firm to conduct an internal company investigation into the issues raised by SOMO. In a letter dated 17 August, in possession of SOMO, the company notified staff that it had “initiated an investigation into certain misconduct allegations on the part of some staff members” and that an “investigating team” from a local law firm might need their cooperation for this investigation.¹³⁰

A subsequent letter to staff, dated 25 August, shows that it took Wildlife Works only a few days (after the investigation began) to suspend “three members of staff ... from Wildlife Works Sanctuary pending an investigation into allegations of potential serious misconduct raised by a third party”.¹³¹

Notably, the three men suspended by Wildlife Works were the same men that SOMO’s interviewees have identified as perpetrators. SOMO had identified two of these men to the company – not the third person, because we were concerned it would reveal the identity of someone we interviewed. This suspension suggests that Wildlife Works was easily able to identify the third alleged perpetrator, which leads to the question of how the company so apparently easily knew this person’s identity.

In the weeks that followed, the lawyers hired by Wildlife Works interviewed employees in a guest house in Maungu, called Holiday Villa. This location is significant since, according to several of the people we interviewed,¹³² a key perpetrator coerced women into sex in this very same guesthouse. Obviously, women with potentially painful and traumatic memories of this place might not feel free or safe to relive and discuss these experiences there. While Wildlife Works and the lawyers were likely unaware of the significance of the venue, giving consideration to such matters would be good practice for an investigation in gender-based and sexual abuses.

In our communications with Wildlife Works that led the company to open its investigation, we wrote:

“We would recommend that Wildlife Works ensures that the safety, dignity and wellbeing of staff and community members is made central to how the company responds to this situation. In this regard the advice of experts on sexual and gender-based violence should be consulted. Action that further harms individuals should be avoided with all due diligence.”

In our view, Wildlife Works has failed to act on this basic recommendation. The location for interviews with those who have been affected by gender-based violence and sexual abuse is one of the basic considerations in ensuring safety and privacy and minimising re-traumatisation.

SOMO's follow-up research

In October 2023, following up on SOMO's earlier research, our researchers interviewed women and men to understand how they had experienced the company's internal investigation. SOMO contacted all the current and former employees who had already testified to being subjected to or witnessing sexual harassment or abuse, and whose testimonies are the basis of this report.

Of all the women who had provided SOMO with testimony about sexual harassment and abuse, only one said she had been interviewed by the lawyers conducting Wildlife Works' internal investigation. The other women – most of them current employees, and some former – said they had not been selected to take part in the investigation. According to one of these women – a victim of attempted rape who had reported the issue to multiple senior managers at the time – the reason she was not called in was that “they worried I might expose problems”.¹³³ Despite the professed purpose of the investigation of uncovering problems, she did not believe this was actually the case.

Only one of the men SOMO originally interviewed told us they were asked to meet with the Wildlife Works lawyers.¹³⁴ SOMO was not able to establish how many people the internal investigation spoke to in total, nor the criteria for selection of people to be interviewed by Wildlife Works lawyers.

In undertaking this follow-up research, SOMO identified three more individuals affected by sexual harassment and abuse who were interviewed by the law firm.¹³⁵ Thus, of the five people we spoke to in October who had been interviewed by the legal team hired by Wildlife Works, only two had been interviewed by SOMO before, for this report.¹³⁶ The other three are: a woman who claims both she and her daughter had resisted pressure by a senior Wildlife Works staff member to have sex with him for an extended period of time; a woman who had been groped and repeatedly harassed; and a man whose wife had been harassed.¹³⁷ The testimonies of these three individuals add to the evidence presented in this report, and bolster SOMO's impression that the scale of the harassment and abuse goes far beyond what we have been able to capture in our research.

These five Wildlife Works employees raised several concerns about the investigation.

Four employees¹³⁸ reported that the lawyers used the interview to find out if they had participated in SOMO's research, asking them if they "had heard about a company called SOMO", if they "had been interviewed by any team concerning Wildlife Works", or a similar question. These questions, coupled with the fact that the lawyers "were sent by the company",¹³⁹ led the employees to doubt the motives behind the investigation, and whether their testimonies would remain confidential.

One of them told SOMO:

"I was worried that if I say 'Yes' [to the question if I had spoken to SOMO] they might report to my bosses that I'm a betrayer of the company, because they told me that they were mandated by the company to carry out that investigation, so for my own safety and the safety of my job I answered 'No'."¹⁴⁰

While this person chose not to disclose that they had been interviewed by SOMO before, they did tell the lawyers about the sexual harassment and abuse at the company, both of employees and of rangers' spouses. More specifically, they told the lawyers (as they had told SOMO before) that "ladies have to have sexual intercourse to secure a job"; that "when [male] rangers are away, [a senior male] goes to see their wives"; and that several victims of these abuses – colleagues and one colleague's spouse – had confided to them directly.

According to this employee, many of their colleagues had, like them, given the lawyers detailed accounts of gender-based harassment and abuse at Wildlife Works: "Many people talked the truth [because] everyone has been waiting for a long time for these questions to be asked, because they need help and want change."¹⁴¹

Another employee – a woman who has been subjected to severe harassment and retaliation – made a different decision. She decided not to disclose to the lawyers any of the abuse she had suffered and that she believes to be rampant across the company, for the simple reason that "maybe they could have me fired".

In total, four of the five people SOMO interviewed in October 2023 chose to open up to the lawyers and tell them about Wildlife Works' culture of abuse.¹⁴² Among them was a woman who herself has experienced years of abuse, and retaliation for refusing to succumb, who told SOMO she felt relieved she could finally share her story with the lawyers. The man and woman who interviewed her "made me feel comfortable", she said, and confident "that this will finally create change".¹⁴³

This expectation was shared by a female employee who says she "told the lawyers everything ... on how [name redacted] mistreats staff, and especially women who refuse to sleep with him". This woman shared with the lawyers an audio recording of a phone call – which she played for SOMO during the interview – wherein the male staff member in question is pressuring her to let him come over to her place. The woman explained she had decided to record one of her harasser's phone-calls after he had physically assaulted her in her workplace, leaving her afraid that "he can rape me".¹⁴⁴

“I recorded and shared with my neighbour,” she told SOMO, “so that if anything happens to me, there is evidence.” When the lawyers asked her to speak about the problems she had experienced, she says that she did not think twice, believing it could help make Wildlife Works safer for women.

Another person who felt confident that the investigation will bring about change, and had positive experiences of the interview, was a ranger whose wife had been coerced into sex with a senior member of Wildlife Works staff. This man says he told the lawyers “the whole story, because I’m still hurting and want these things to end and never be repeated.” This ranger not only shared his own story with the lawyers, but also says he told them that “he [the alleged perpetrator] does this to other people too”.¹⁴⁵

Based on these accounts of Wildlife Works’ internal investigation, it appears that there are significant flaws in the process. It is not clear why some people were interviewed and others not. The fact that the investigation is under the control of the company – and it appears that people were not offered the choice either to meet the lawyers or to communicate in other ways that would be safe for them – is a significant concern. Nonetheless, based on the interviews with those who spoke to the lawyers, the investigation has been given clear information as to the issues and the culture at Wildlife Works.

None of the people SOMO spoke to knew when the investigation would conclude or what action would be taken.

Companies that have bought or invested in Kasigau carbon credits

SOMO wrote to the following companies, which are clients of or have invested in Wildlife Works’ Kasigau project: Audi, Barclays Bank, Coca-Cola, Deliveroo, Kering, McKinsey, Microsoft, Netflix, and Shell. In our letters, we laid out our findings and made recommendations on how to support affected communities and engage with Wildlife Works. Of these companies, only Audi, Barclays, Kering, and Shell responded.

Audi

Audi initially stated it had never purchased credits from Wildlife Works’ Kasigau project.¹⁴⁶ SOMO then sent Audi a *Huffington Post* blogpost about Kasigau, indicating otherwise. Titled ‘How Women Are Effecting Change in Kenya’s Kasigau Corridor’, the article echoes the romance of Kasigau of Wildlife Works’ own marketing messaging, and the author discloses that Audi sponsored his visit to Kasigau as “part of my work documenting Audi’s carbon offset program”.¹⁴⁷ Audi’s support for Wildlife Works, the reporter notes, helps to “compensate for the manufacturing and the first 50,000 gas driving miles of the new A3 e-tron”, while enabling women to create their own “story of renaissance”.

Audi subsequently confirmed the use of carbon credits in 2014 but said it had no intention to use credits in the future. Audi did not clarify to SOMO its relationship to Kasigau, or explained how it views the contradictions between SOMO’s findings and the uncritically positive picture painted in the *Huffington Post* blog.¹⁴⁸

Kering

The response by Kering – the luxury fashion company known for brands such as Gucci and Balenciaga – was more constructive. The company stated:

“Kering has invested in good faith in certain projects which we trust can have a positive impact on local environments and communities but we also value the importance of whistleblowing as a key element in furthering our ESG [environmental, social, and governance] ambitions and have no tolerance for acts that are in contrast with our core values.

“At this stage, we have no information other than the elements listed in your letter. For that reason, we very much look forward to your report’s findings and will engage with you on that basis for further action if warranted. In the meantime, we are totally aligned with your suggestions for immediate action.”¹⁴⁹

In response, SOMO has shared an embargoed pre-publication copy of the full report with Kering, requesting the company’s urgent attention to the recommendations. We look forward to engaging further with Kering.

Barclays

Less productive was the response by Barclays, which acknowledged the seriousness of the allegations but denied that the company has “a relationship with Wildlife Works”, stating:

“Our last purchase of the Kasigau Project REDD+ carbon credits was for our 2020 carbon portfolio. Barclays has no plans to purchase any Kasigau Project REDD+ carbon credits in the future.”¹⁵⁰

However, given that the abuses have been going on for years, SOMO considers this response, and the company’s implied refusal to act on our report recommendations, inadequate.

Shell

Shell responded by stating they were “in contact with the project developer and its agent and await the findings of the independent review into these allegations that has been commissioned by the project developer”.¹⁵¹ Shell went on to state that the company “will not tolerate harassment, nor action, conduct or behaviour which is humiliating, intimidating or hostile”.

SOMO underlines to Shell that the ‘review’ to which it refers is not independent. We expect Shell to follow up robustly.

Non-responding companies

The following companies failed to respond: Coca-Cola, Deliveroo, McKinsey, Microsoft, and Netflix. Of these, Netflix in particular stands out, given the role the company has played in popularising Kasigau through the previously mentioned YouTube film.

Conclusions and recommendations

The testimonies provided to SOMO paint a **shocking picture of sexual harassment and abuse**, perpetrated by senior male employees of Wildlife Works. The accounts make clear that the abuses were **not isolated incidents**. On the contrary, the picture that emerges is of a **permissive culture of abuse** of women within the organisation and in the surrounding community. Women had nowhere to turn to seek help, and efforts to resist, let alone report the abuse were penalised. **The powerful positions** of key male staff allowed them **to control the narrative** and the people who depend on the Kasigau project.

SOMO considers that Wildlife Works has allowed or enabled an abusive culture to persist at Kasigau. If Wildlife Works' US headquarters were unaware of the situation, this indicates that their audits and other oversight mechanisms are deeply flawed.

As an employer, Wildlife Works has responsibility to all its employees and to people affected by its operations. This includes responsibility to prevent sexual harassment and abuse and to have in place safe and effective means for people to report harassment, assault, and abuse. No such system appears to be in place for Kasigau.

Commercial carbon offsets as a driver of abuse

SOMO identified the abuses at Kasigau during wider research on carbon offsetting and human rights, which we will publish in due course. The carbon offsetting industry produces carbon credits or offsets and sells these products to companies. This product is increasingly discredited as a means for companies to address climate change.¹⁵²

The industry's conversion of an environmental imperative into a business opportunity seeks to remedy climate change by using the same flawed logic that has created the climate crisis. The market will not solve climate change. Carbon offsetting merely delays the necessary action of drastically reducing emissions.

Commercial carbon credit schemes also frequently sell a narrative about 'local development benefits', which some clients purchase as part of the package and use for public relations purposes. Additionally, as at Kasigau, some carbon offset companies promote women's empowerment benefits, making local development and women's rights a commodity that others can purchase. This reliance on SDG-heavy narratives of 'community empowerment' and 'gender equality' to sell their credits contrasts starkly with a business model that also frames climate change as caused by the local actions of marginalised communities in the Global South who do 'harmful' things like using wood for charcoal and grazing cattle.

By preventing the 'culprits' from carrying out such 'harmful' activities, and sometimes framing their livelihood strategies as criminal, companies like Wildlife Works sell their products to multinational companies for a profit, while turning a blind eye to the abuse embedded in their own operations. Neither the fact that some prior local livelihood strategies may have become problematic, nor that there are also some positive outcomes from some carbon offset projects, absolves companies from responsibility for the harm such projects inflict. As international human rights law affirms, negative human rights impacts cannot be offset by 'doing good'.

And despite their 'community empowerment' rhetoric, the partnerships between companies and communities forged under the banner of carbon offsetting are rarely based on equality or equity. On the contrary, they involve power imbalances and conflicting interests that create the conditions for human rights abuse to thrive.

While this report focuses on sexual harassment and abuse – an understudied problem in carbon offsetting research – other studies have uncovered other human rights harms. These include community displacement and disregard for the right of Indigenous Peoples to free, prior, and informed consent (FPIC).¹⁵³ According to Jens Friis Lund, the Copenhagen professor of political ecology quoted previously, SOMO's findings add to an "already damning picture":

“We’ve known for some time that REDD+ projects have helped create a false sense that the climate crisis can be averted through offsets. We’ve also known that poor people tend to lose out when these projects are implemented. However, this evidence adds a whole new layer of harms inflicted by REDD+ and points to a frightening indifference amongst project proponents about their responsibility in all of this.”¹⁵⁴

Recommendations

SOMO’s main recommendation with regard to Kasigau is that the abuse must end; the perpetrators must be held accountable, and the victims must receive full and effective remedy. Independent actors must be involved in investigating the situation. An investigation controlled by Wildlife Works would not be credible. The investigation should rigorously comply with human rights standards and deal both with specific instances of abuse and with Wildlife Works’ wider organisational culture and failures of accountability.

SOMO joins the many environmental actors calling for the carbon offsetting industry to be stopped. Offsetting as a commercial practice is so problematic and subject to such conflicts of interest that it should not continue. No new carbon offsetting projects involving the foreign-investor-led commodification of people and their environments should start. However, countries with significant natural resources beneficial to addressing climate change should be able to access financial support to preserve their natural wealth – on their own terms.

The risks posed by existing carbon offset projects frequently outweigh their positive benefits for local communities. Nevertheless, these benefits should be preserved where they have occurred, in a way that respects human rights. Operational offsetting projects cannot simply be closed down, since to do so would likely inflict further harm on vulnerable people. But they can be de-commercialised, decoupled from the discredited carbon offset concept, and supported in other ways. Companies that have benefited from offset projects should contribute to independently managed funds that support community-led projects. This funding can be seen as a limited form of remedy. Other actions may be necessary where carbon offsetting has led to wider abuses such as those identified at Kasigau.

In Kenya, the government must urgently act to protect the rights of people working for and affected by large commercial ventures like Kasigau. SOMO and other organisations, notably our partner the Kenya Human Rights Commission, have reported on sexual harassment, assault, and other grave human rights abuses on tea plantations and at other large land-based investments in Kenya.¹⁵⁵

More specific recommendations to different actors identified in this report follow below.

Recommendations to Wildlife Works

- Urgently enable a fully independent investigation of sexual abuses at Kasigau.
- Ensure the investigation is completed in a rights-respecting manner and leads to accountability and remedy.
- Do not require survivors of abuse or witnesses to it to sign non-disclosure agreements.

- Carry out a review of all your projects; disclose the findings; and remedy all abuses identified.
- Make a clear commitment to maintain community benefits at Kasigau, regardless of company profits, and make a full disclosure of the financial position of Wildlife Works and associated corporate entities.

Recommendations to client companies

- Inform Wildlife Works of your grave concern about the findings in this report and your support for SOMO's recommendations.
- Call on Wildlife Works to engage independent, impartial, and credible external experts to investigate all alleged abuses at Kasigau and to support all of those who have been subjected to abuse. Independent investigators should have expertise on gender-based violence and a clear understanding of the challenges women face when reporting sexual harassment.
- Demand that Wildlife Works ensure no employees or community members are harassed or subject to retaliation, that the company prevent alleged perpetrators from contacting affected people, and that it ensure the highest standards of good practice are followed throughout the investigation and follow-on processes to address the situation.
- Inform Wildlife Works that it should not ask people to sign non-disclosure agreements on this matter.
- Contribute financially to a remedy fund for the women and men affected by the abuse and to support community livelihoods, decoupled from offsetting.

Recommendations to social and environmental auditors

SOMO considers that the social audit industry is deeply flawed. Its main purpose is to provide other business sectors with a veneer of legitimacy in their claims about social and environmental issues, including their net-zero carbon goals. The auditing companies that gave Wildlife Works' Kasigau project a clean pass owe it to the people affected to:

- Disclose all information needed to support a thorough and impartial investigation of gender-based abuse at Wildlife Works and Kasigau.
- Contribute financially to a remedy fund for the women and men affected by the abuse.
- Apologise publicly to the affected women and men at Kasigau for their failure to identify and report on the abuse, and for perpetuating the fiction of Kasigau's entirely positive social impacts.

Recommendations to governments

- Governments should urgently require an end to the use of carbon offsetting as part of net-zero strategies. While projects that protect forests and other carbon sinks should be supported, this should not be in the form of development aid or other neocolonial structures. Rather, it should be in the context of the responsibility of governments, primarily in the Global North, to provide reparations to countries that did not cause climate change but are bearing the consequences and are now expected to help solve the crisis.
- Home state governments of social and environmental audit companies (chiefly the US, EU, and UK) should robustly regulate the audit industry, which plays an insidious role in camouflaging abuse. At a minimum, governments should require that auditors cannot be paid by the company they audit. Companies

seeking the endorsement of a social or environmental audit should pay into a blind fund for a minimum of three years, with independent oversight of the fund and the resulting audits. If such regulation makes the social and environmental audit industry commercially unviable, we conclude that an industry that cannot survive free from conflict of interest should not exist.

SOMO will set out broader recommendations on these issues in a subsequent report on the offsetting industry.

Recommendations to the Kenyan government with regard to carbon offsets

- The Kenya National Commission on Human Rights, the National Gender and Equality Commission (NGEC), and the Ministry of Labour should move in with speed and conduct their own independent investigations into the grave allegations we raise in this report and should institute appropriate action against Wildlife Works.
- In line with its mandate, the NGEC should obligate Wildlife Works to show commitment to end sexual harassment and exploitation of women and to report regularly on its progress towards this commitment.
- Further, the NGEC should ensure that victims of sexual abuse and exploitation at Kasigau receive protection from the alleged perpetrators and that victims are fully informed of mechanisms for referrals.



Endnotes

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This report would not have been possible without the enormous courage in speaking to us of the women who experienced sexual harassment and abuse, often sharing deeply traumatic experiences, for which we express our sincere thanks.

Colophon

Offsetting human rights

Sexual abuse and harassment at the Kasigau
Corridor REDD+ Project in Kenya

November 2023

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The Kenya Human Rights Commission (KHRC) has been campaigning for the entrenchment of human rights and democratic culture in Kenya since 1992. It supports individuals, communities and groups to claim and defend their rights and holds state and non-state actors accountable for violations.

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