



Independent Human Rights Investigation

Statement Upon Conclusion of Investigation

Executive Summary

- Since December 2023, a team comprising specialist lawyers from Omnia Strategy and Doughty Street Chambers have been conducting an independent investigation into allegations of human rights violations against local communities and autochthone populations occurring in or connected to the Odzala-Kokoua National Park (“**Odzala NP**” and the “**Park**”) in the Republic of the Congo (“**Congo**”). The allegations, raised by Survival International and others, implicated African Parks Network (“**African Parks**”) and the Odzala-Kokoua-Lossi Foundation (“**OKF**”), notably through the alleged wrongdoing of ecoguards.
- The allegations investigated were serious, and the investigation was planned and conducted with due care, rigour and professionalism. Our methodology was informed by international standards and best practice relevant to the conduct of human rights investigations – including informed consent, ongoing risk assessment and confidentiality – to deliver a safe and proportionate investigation. Across an investigation spanning 16-months and multiple investigative trips to Congo, South Africa and two other jurisdictions, we engaged neutrally and impartially with relevant stakeholders, including potential victims, witnesses and accused parties.
- On behalf of the independent investigation team, Omnia wishes to express its sincere appreciation to all stakeholders who participated in our investigation. We have been greatly assisted by autochthone and other local communities living around the Park, past and present African Parks and OKF personnel, intergovernmental organisations and civil society organisations, public officials responsible for autochthone issues and local government officials, and partners including Congolese legal counsel, interpreters, translators and transcribers. While allegations reported by Survival International informed our investigation, despite extensive efforts to agree a basis for information-sharing, Survival International declined to provide further evidence, citing concerns about our investigation (with which we disagree).
- Our investigation has now concluded. This statement does not address the findings of our investigation nor any advice or recommendations we have delivered to African Parks.

1. Background and Mandate

- 1.1. In June 2023, African Parks Network (“**African Parks**”) received a communication from Survival International (an organisation that advocates for the rights of indigenous and tribal peoples) regarding allegations of human rights abuses committed by ecoguards against Baka community members near Odzala-Kokoua National Park (“**Odzala NP**”). Survival International made some general and some more specific allegations of Baka people having been violently evicted from their lands causing starvation, and subjected to torture and other mistreatment and abuse, including rape. Survival International also made broader allegations relating to what it describes as “*colonial conservation*” or “*fortress conservation*”, its underlying criticism being that indigenous peoples are being wrongly denied access to lands now managed as protected areas.
- 1.2. In December 2023, Omnia Strategy LLP (“**Omnia**”) was engaged by African Parks to investigate allegations of human rights violations against local communities and autochthone (indigenous) populations occurring in or connected to the Odzala NP implicating African Parks and OKF.
- 1.3. Our mandate was two-fold:
 - First, to investigate the truth of allegations of human rights abuse by ecoguards, including but not limited to those raised by Survival International, said to have occurred from 2010 when African Parks took over management of Odzala NP to 2024, and
 - Second, to assess the extent to which African Parks complied with its obligations and expectations in respect of human rights in relation to the incidents under investigation.
- 1.4. Our investigation was thorough and proportionate without attempting to be exhaustive. The scope of our investigation was informed by our expansive review of available and obtainable documentary evidence and further targeted engagement with relevant civil society actors, through which we identified specific alleged incidents of human rights abuse falling within our mandate. In accordance with international best practice, we then selected for investigation allegations corresponding to 21 separate incidents based on factors including gravity and severity, risks to the safety and security of potential victims and witnesses, the representativeness of the allegation, the nature of the available and obtainable evidence, and the reasonable and proportionate allocation of resources. An incident does not necessarily involve a single alleged victim, and various of the incidents under investigation concerned multiple alleged victims.
- 1.5. Based on the above criteria, we investigated incidents involving allegations of physical and serious sexual violence (including rape) amounting to torture or other ill-treatment, of unlawful killing, and of arbitrary arrest and detention. We did not seek to investigate broader allegations relating to the wider dialogue around conservation models and how best to protect

wildlife and the rights of indigenous people – including consideration of any continuing effects of alleged historic forced eviction – were beyond the scope of our investigation.

2. Investigation Team

- 2.1. Our investigation team has comprised dedicated human rights lawyers and additional legal and paralegal support from Omnia Strategy, with additional specialist counsel from Doughty Street Chambers.
- 2.2. The team has been overseen by Omnia’s Founder and Chair, [Cherie Blair CBE, KC](#), and coordinated by Omnia’s Head of Human Rights, [Adam Smith-Anthony](#). The field investigative team was led by [Emily Pica](#) and included [Lauren Lederle](#) (Omnia) alongside [Tim Cooke-Hurle](#) and [Jelia Sané](#) (Doughty Street Chambers). Ms Sané has been the team’s designated lead on our engagement with vulnerable potential victims and witnesses, responsible for ensuring that the team’s interactions in the field with such individuals (including, amongst others potential victims and witnesses of torture and sexual violence) were safe, ethical and in line with the team’s internal policies and protocols. Mr Cooke-Hurle led the investigation of organisational human rights compliance. Further legal and paralegal support has been provided primarily by [Emily Hampshire](#) and [Charlotte Smith](#) (Omnia).
- 2.3. The team has brought to bear its substantial expertise and experience across a range of matters relevant to this investigation, including international human rights law and practice, working with vulnerable victims and witnesses and the operationalisation of organisational responsibilities to respect human rights. Further expert input and other perspectives have been obtained through our engagement with a broad range of informed stakeholders and other local and international actors.

3. Evidence-Gathering and Stakeholder Engagement

- 3.1. While commissioned, paid for and supported by African Parks, our investigation has been independent (of African Parks and of any other stakeholder and interests). Based on an agreed scope of work and terms of reference, we have planned and carried out our own investigative activities and analysis, ensuring that the process and any outcomes are the product of our own expertise and experience, independent judgement and work.
- 3.2. In January 2024, relevant allegations of human rights violations in and around Odzala NP were reported online by Survival International and in the Mail on Sunday (UK) and Tagesschau (Germany). We took this reporting into account as we finalised the initial scoping and planning of our investigation. Despite extensive efforts to agree a basis for information-sharing, Survival International did not provide further evidence, citing concerns around our investigation’s scope, safety and transparency (with which we disagree). We were nonetheless able to investigate a number of these allegations. We asked the Mail on Sunday and Tagesschau reporters whether they could provide any further information to assist our investigation but they did not engage with us (as was their prerogative).

- 3.3. Our investigation also addressed a number of further allegations (comprising the majority) identified to us by other sources.
- 3.4. We conducted four investigative missions to the Republic of Congo, one investigative mission to South Africa and two further missions to other jurisdictions. Through investigations during these missions, various remote interviews, and correspondence and questionnaires, we heard from approximately 180 stakeholders, including potential victims and witnesses in the community, Odzala NP staff (including ecoguards) and African Parks regional and head office personnel, as well as a wide range of individuals with relevant insights, such as non-governmental organisation representatives, UN officials, and local government officials. At all times, we remained committed to safe, neutral, impartial engagement with all relevant stakeholders, and were clear with them regarding our work and objectives to ensure that consent to participate was properly informed and that confidentiality could be requested and ensured as appropriate.
- 3.5. We also conducted a systematic document collection and review process, including through missions, desk research, access to data held by African Parks and OKF, and through targeted document requests.
- 3.6. In our view, we have been able to access an appropriate number and range of interviewees and obtain sufficient evidence in respect of most incidents and issues under examination. We have sought to do so in a responsible, safe and appropriate manner. In respect of six of the 21 incidents under investigation, our team was unable to conduct a full investigation with respect to the truth of these allegations due to limitations in the available and obtainable evidence (e.g., where we were not able to identify and/or interview potential victims and witnesses and/or visit the relevant area). For these six incidents, we limited our investigation to the adequacy of the Park's response, while directing recommendations towards appropriate investigative steps to resolve these incidents. African Parks has confirmed that it has already determined that a separate independent investigation will be commissioned in respect of the allegations in one such incident and that it will follow our recommendations in respect of the remaining incidents.
- 3.7. Throughout our investigation, we have maintained our independence while relying on the cooperation of African Parks. We have coordinated with a group of senior leaders within African Parks, including reporting to and receiving input from the African Parks Board. We are grateful for the assistance we have received over the course of this investigation, which we acknowledge required more time, effort and resources than African Parks envisaged at the outset.

4. Conclusion

- 4.1. Our investigation has now concluded.
- 4.2. By agreement with African Parks, this document does not address the findings of our investigation nor any recommendations or other advice provided to African Parks.

4.3. Reflecting on the conclusion of our investigation, Mrs Blair said:

“Conducting this investigation has been an important responsibility and throughout we have been conscious of the trust placed in us by so many people – by the individuals and communities living around Odzala National Park who have come forward and shared their experiences, by African Parks who commissioned and continued with a serious independent investigation charged with finding and following relevant evidence, and by other stakeholders who have assisted us. I would like to express our gratitude to everyone who participated in the process. Our team is pleased to have completed our investigation, which we hope will contribute positively to ongoing human rights efforts in and around the Park.”

4.4. Our investigation team joins Mrs Blair in expressing gratitude to everyone who has provided assistance and information to our inquiry.

Omnia Strategy LLP
London, May 2025

<i>This document is not intended to waive privilege in any report or other client communication or investigation material.</i>
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