



July 1 2021

To: Mr. Kars de Bruijne, Members of the Supervisory Board and Advisory Council of Clingendael, and the Executive Team of ACLED.

From: African Parks Network (APN)

The joint report “Laws of Attraction: Northern Benin and risk of violent extremist spillover” dated June 2021, written by Mr. Bruijne and produced by the Conflict Research Unit of Clingendael, in partnership with the Armed Conflict Location & Event Data Project (ACLED) refers.

The situation in northern Benin and the escalating violence by violent extremist organisations (VEOs) emanating from the Sahel is of serious and urgent concern. Efforts to understand how VEOs exploit local tensions is therefore a worthy and necessary undertaking and of interest to all concerned with this situation. This includes African Parks Network (APN), also referred to as African Parks (AP), a conservation organisation which has management responsibility for both Pendjari National Park and W National Park (Benin), as well as the International Donor Agencies that fund our work.

However, this report is disappointing for multiple reasons. Firstly, researchers made zero attempt to engage with AP or the numerous international donor agencies involved in funding our efforts, even though we along with these agencies are a primary source of credible information. Instead, the report relies heavily on unverifiable “undisclosed”, “confidential” or “grey” interviews with nameless individuals and institutions with zero accountability for often-times completely baseless statements. Secondly, the report is full of factual inaccuracies which, if the research team had taken the time to engage transparently, might have easily been rectified. Recommendations based on factual inaccuracies are therefore either questionable or flawed. Thirdly the report draws some conclusions which are in direct conflict with commonly accepted logic. As a result, this approach casts doubt over the professionalism of the researchers, the credibility of Clingendael as an Institution and forces the question as to whether there was a pre-conceived agenda.

Each of these three fundamental issues is dealt with in turn. Comments and feedback are limited to those issues directly related to Pendjari National Park, W National Park (Benin) and to AP, even though there are other multiple statements which support the notion of a pre-meditated agenda.

1) Zero effort to contact African Parks or any of the donors supporting the management of Pendjari National Park and W National Park (Benin).

African Parks has been responsible for the management of Pendjari National Park since May 2017 and W National Park (Benin) since June 2020. AP has full management teams in place in both parks, none of whom were contacted by Clingendael. Neither did Clingendael make any effort to contact AP as an institution.

Rather, Clingendael relied on the least credible of information sources being “undisclosed” or “confidential” sources with nameless, unverifiable individuals and institutions with zero accountability

for oftentimes completely baseless statements. Declaring their “grey” nature does not improve the lack of credibility. Even if “*new data has become available from an undisclosed local organisation*”, such a source should be used to identify issues, which researchers then verify through more credible and accountable sources.

AP is a credible, international NGO that makes available monthly park reports to all stakeholders, that publishes its annual financial accounts, and which has a website that is open access to all. We find it remarkable that Clingendael made no attempt to use these publicly available sources of information – otherwise the report would not have made the most basic of mistakes. Similarly, the international agencies that support the work are well known and might have served as credible and accountable sources to verify issues. This style of research simply has to be condemned, especially when transparent sources are available and which can be held accountable for their content or statements made.

2) Factual inaccuracies in the report

There are multiple factual inaccuracies contained in the report that are material to the conclusions drawn. In addition, anecdotes which themselves lack context and in some instances are wholly false were employed as evidence to mount unacceptable and libellous claims against AP. The distortion and omission of accurate information reflects bias and severely undermines the legitimacy of the report, which consequently fails to provide a balanced, fact-based assessment of a deeply complex, vitally important landscape.

The following are just a few examples of some of the falsehoods, confused, or distorted anecdotes, and bias to which we refer (again, limited to Pendjari and W National Parks).

- Mr. Bruijne claims that under AP’s management, Pendjari National Park and W National Park have been “*privatised*” leading “*to the closure of public access to the park[s], which in turn stoked local tensions*”. This is factually incorrect. Firstly, the parks have not been privatized. Privatisation of protected areas involves the transfer of ownership of a park from the State to a private individual or institution. AP does exactly the opposite. Governments remain the owners of the parks for the benefit of the people of the host country, including local communities. Furthermore, putting people at the centre of the rationale for conserving these areas, especially local people, is fundamental to long-term sustainability, and is core to AP’s model. In total contradiction of the researcher’s claim, the governance model put in place by AP includes members of the local community, ensuring that community interests are incorporated into all park decision-making. Moreover, there has never been any “*closure of public access to the park*” – to the contrary, AP has improved access to the Parks through improved roads, facilitated free public access to the parks by thousands of local community members, as well as a considerable number of paying Beninese visitors, demonstrating the value placed on these wildlife areas by the general Benin public. The only time Pendjari was closed was in May 2019 in immediate response to the attack in which a Beninese guide was murdered and two French tourists kidnapped – in our view this was a responsible management action designed to protect the lives of the public.

- The author states that *“tension created by privatisation of the parks led to an event in early 2020...when traditional chasseurs [hunters] attacked APN headquarters ...In response park rangers seized and destroyed chasseur equipment”*. Mr Bruijine is incorrect; again, with claiming the parks were privatised, and the date of the incident referenced was in fact February 17th 2018. *“The chasseurs”* were in fact poachers (illegal hunters) hunting in the park and while park rangers in accordance with the wildlife laws of the country confiscated their illegal weapons, the conflict was finally deescalated and resolved peacefully.
- The author states in reference to AP’s efforts to work with communities and regulate access to the park: *“... none of this has been truly sufficient. There have been violent incidents around Park W over park management. In fact, in both parks there seems to be at present an ongoing tit-for-tat dynamic where park rangers detain people and confiscate equipment... and local communities retaliate by destroying park infrastructure and attacking park rangers.”* This is another inaccurate portrayal without substantiation. There has only been one such incident of retaliation by poachers (who do not represent the broader communities with which we work), which is the incident referenced above on February 17th 2018 and had nothing to do with W NP. Furthermore, as our data show, the combination of law enforcement and community programs are seeing a consistent decline in the number of arrests and confiscations since AP assumed management, signaling a return of good governance to the region.
- The author continues to allude to AP’s involvement as a source of instability: *“Where most violence took place in 2017 and 2018, there is presently continued destruction of property and serious violence. For example, on 8 September 2020, unknown individuals equipped with machetes killed and mutilated a guard at a farm in Pede (Kandi, Alibori)”* – This is factually incorrect as there has not been any destruction of property by AP outside of any national park boundary and further AP is not aware of the incident referred to on 8th of September 2020. If such incident did happen, it had nothing to do with the park.
- Some of the most spurious claims revolve around Mr. Bruijine’s accusations that AP *“is not simply a wildlife conservation enterprise”*; *“has transformed into the country’s counter-terrorism unit”*; and has *“assumed command over the FAB in the border areas”*. These statements are categorically false. Following a tragic incident which saw the kidnapping of two tourists and the murder of their local guide in Pendjari in May 2019, the Government of Benin determined to deploy the national military to secure the international border of the park. Our MoU with the Government, which outlines the deployment of the FAB, makes a very clear distinction between African Parks’ continued responsibility for park law enforcement within the limits of the parks and the FAB’s responsibility for countering threats to the nation. African Parks is a conservation non-profit which operates with clear and transparent park management mandates from Governments. APN is not responsible for national counter terrorism, or in command over, or supersedes, the national military.

AP's model is to not "*privatise security*", but rather to professionalize park management, to uphold the country's wildlife laws, and to protect the country's natural resources for the benefit of local people and wildlife. Stability, safety and security are foundational requirements for sustaining natural ecosystems. Equally, they are necessary for people to enjoy their human rights and for attracting public and private investment, generating jobs and stimulating enterprise.

- The report alludes to several encounters with VEOs in the parks and the author launched more libellous accusations against APN, the report states: "*Sources close to APN suggest that when [APN] encounters VEOs in the park, they sometimes return them to the border with instructions to stay on the non-Beninese side of the park*" and "*What seems to have emerged, is a precarious and informal equilibrium and perhaps more explicit informal agreement has been reached that VEOs can operate somewhat freely in Benin's north as long as they pose no real threat to the country*". Both of these statements are categorically untrue with no foundation in fact. APN has never returned VEOs to the border with such instructions, nor is there any informal or formal agreement that APN has made with VEOs.
- Mr. Bruijne writes that "*it is claimed that the operating budget of APN is 40 million euro (even though that is equally unclear)*". This further calls into question the thoroughness of the research conducted and lack of commitment to fact-checking. APN is a registered non-profit with independently audited financials that are made public on an annual basis. Our operating budget for 2019 was 74 million US dollars, and in 2020 it was 84 million dollars.
- Mr. Bruijne reports "*... in Ethiopia APN was accused of burning property in order to intimidate local communities and force resettlement*" to support his narrative. This statement is not true and APN's engagement in Ethiopia continues to be falsified by individuals who wish to perpetuate a fictitious narrative.

3) The report draws some conclusions which are in direct conflict with commonly accepted logic. Some of these are as follows:

- In section 3.3, titled "*Toxic tourism: the privatisation of Pendjari Park and Park W*", the report provides an extremely reductionist view, with no meaningful expansion on or explanation of the title and only a single reference to tourism in the entire remainder of the section. Quite peculiar. Furthermore it fails to mention that ecosystem health, stability and economic investment are all foundational requirements for long-term social security. The Government of Benin partnered with African Parks to manage Pendjari and W National Parks to professionalise park management, bringing the requisite resources and expertise to ensure the long-term financial, social and ecological sustainability of this crucial West African ecosystem. Tourism development forms just a component of this broader strategy. In addition both domestic and international tourism are promoted by development and conservation agencies around the world to help

fund the protection of natural landscapes and to bring about benefits for local people. In 2019, pre-covid, over half of the paying tourists that visited parks managed by African Parks were local residents of their countries. International visitors pay higher park-entry fees than local residents, thereby carrying a disproportionate burden of maintaining the parks. Moreover, the report fails to disclose that all revenue generated, whether by tourism or other initiatives, goes back to the parks and the communities supported by the parks (as evidenced by independent audits).

- The report concludes that African Parks' management of Pendjari and W National Parks (Benin) represents a risk in "*accelerating dynamics that will be hard to control*" with respect to regional insecurity. This logic is completely flawed. Insecurity has expanded uninhibited in the Sahel precisely because of lack of good governance in these areas, not because of good governance. In the case of northern Benin, insecurity has spilled over into the WAP Complex, from neighboring Burkina Faso and Niger where there is an absence of governance and no basic or law enforcement in place. To intimate that the absence of African Parks' management (or any intervention) might neutralize or deescalate VEO activity in northern Benin simply does not hold up. This is contrary to the pattern of destabilization that has already occurred throughout the Sahel where African Parks does not operate.
- In providing only criticism of efforts to regulate resource use and provide structured free access to the parks, the report offers an inadequate, unbalanced and reductionist assessment of the reality of park management objectives. In doing so, it supports and perpetuates a dangerous assumption that protected areas are an infinite resource which can serve as limitless grazing areas, sources of timber, fishing and hunting with no impact on the ecosystem. As has been widely documented, unchecked depletion of the environment has catastrophic long-term social consequences, leading to food insecurity, loss of livelihoods, displacement of people and the exacerbation of conflict between them. None of this is mentioned in the report.

Conclusion

African Parks does not agree with the authors recommendations. Despite offering to fill an information gap by "*exploring local problems*", the report omits information that is critical to the larger security context. This includes how the illegal exploitation of natural resources and the degradation of natural landscapes, arising from poor management, are the very cause of instability, fuelling corruption, long-term tensions and conflict. In contrast to this report there is more evidence to support the view that in the broader region (Nigeria, Niger, Burkina Faso and Mali), the well managed protected areas of Pendjari and W provide an island of stability within a region of ongoing violence. This can be verified by comparing an analysis of incidents from the aforementioned areas to the landscape around the National Parks, which the author fails to do.

While we commend research efforts that wish to support overall solution seeking to the extremely serious security issues in the region, it is our view that a report of this nature should provide a thorough, balanced, factually accurate overview to derive reasonable, integrated solutions for ensuring long-term

stability in this incredibly important landscape. This report is, however, materially inaccurate in multiple areas particularly related to the protected areas mentioned and does not offer a holistic, balanced assessment.

African Parks, its boards, and partners, are committed to ensuring that some of Africa's most vital landscapes are ecologically, socially and financially sustainable in the long-term. This is based on principles of sound management, full accountability and absolute integrity.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrea Heydlauff", with a stylized flourish at the end.

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