

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

October 17, 2018

Mr. Andrew Steer
President and CEO
World Resources Institute
10 G Street, NE Suite 800
Washington, D.C. 20002 United States

Dear Mr. Steer:

On September 5, 2018, as part of an ongoing investigation, the Committee on Natural Resources wrote the World Resources Institute (WRI) seeking clarification on the nature of WRI's advocacy work to influence U.S. environmental and natural resources policy based on its relationships with foreign entities.¹ Specifically, the Committee expressed its concern that WRI's need to maintain access to Chinese officials may influence its political activities in the United States. While WRI's written responses partially addressed one of the Committee's requests, WRI failed to produce requested documents and information for all other requests. Further, the Committee is in possession of certain documents that call into question the candor of WRI's responses.

In a September 22, 2018 letter to the Committee, WRI denied that its relationship with the Chinese government impacts its political activities within the United States. WRI claimed that "FARA simply is not implicated in any way by the work of WRI."² WRI also asserted that it "does not act on behalf of . . . any foreign governments or principals."³

Communications from WRI to senior U.S. government officials, obtained by the Committee, however, indicate WRI actions on behalf of the Ministry of Ecology and Environment of the People's Republic of China (MEE) in the months prior to the draft of the Paris Agreement. As WRI noted in its letter to the Committee, the MEE is WRI's sponsoring agency under China's foreign non-governmental organization (NGO) registration law. Per WRI's letter and Chinese law, WRI is subject to the MEE's "guidance and supervision."⁴ One

¹ Letter from Hon. Rob Bishop, Chairman, H. Comm. on Natural Resources and Hon. Bruce Westerman, Chairman, Subcomm. on Oversight and Investigations, to Andrew Steer, President and CEO, World Resources Institute (Sept. 5, 2018) (on file with Committee);

² Letter from Andrew Steer, President and CEO, World Resources Institute, to Hon. Rob Bishop, Chairman, H. Comm. on Natural Resources and Hon. Bruce Westerman, Chairman, Subcomm. on Oversight and Investigations 3 (Sept. 22, 2018) (on file with Committee).

³ *Id.* at 4.

⁴ *Id.* at 2-3.

email of concern dated April 15, 2015, was sent by the then-Global Director of WRI's Climate Program to U.S. State Department officials.⁵ It reads in relevant part:

We have been approached by the NCSC⁶ in China to pursue a dialogue (potentially track 2) that would bring together top experts from the US and China We think the interest stems from Chinese recognition that this Administration is coming to an end soonish and [Chinese] desire to open up channels in DC that are additional to the ones that are working well now. As you will see, they are also interested in longer-term ideas that one could imagine being discussed with the next Administration (depending of course who it might be).⁷

The email was addressed to the State Department's then-Special Envoy for Climate Change, who has since assumed a role at WRI as a Distinguished Fellow for its Climate Program.⁸ WRI's current Executive Vice President and Managing Director,⁹ as well as, WRI's then-Senior Foreign Policy Counsel¹⁰ were also copied on the email. The email concludes with a request for U.S. officials to collaborate with WRI and Chinese officials, and also references communications with another U.S. official, who may have been an Obama White House Senior Policy Advisor at the time.¹¹

It is difficult to reconcile WRI's representations to the Committee that it "unambiguously has not and does not act on behalf of or in the interests of any foreign principal,"¹² with the April 15, 2015 email and other documents. Similarly, WRI's refusal to provide documents and information responsive to the Committee's inquiries raise additional concerns regarding WRI's candor. At a minimum, WRI's connections to the Chinese government appear to go beyond the mere "convergence of opinions" suggested in its September 22, 2018 letter to the Committee.¹³

The Committee remains concerned that WRI's relationship with the Chinese government has influenced its political activities related to natural resources and environmental policies in

⁵ Email from Jennifer Morgan, Global Director, Climate Program, World Resources Institute, to Todd Stern, Special Envoy for Climate Change, U.S. Dep't. of State, and Claire Sierawski, Chief of Staff, Office of Special Envoy for Climate Change, U.S. Dep't. of State (Apr. 15, 2015, 8:30 AM) (on file with author).

⁶ National Center for Climate Change Strategy and International Cooperation is an institution under the Chinese Ministry of Ecology and Environment (MEE). INTRODUCTION, NATIONAL CENTER FOR CLIMATE CHANGE STRATEGY AND INTERNATIONAL COOPERATION (NCSC), <http://www.ncsc.org.cn/article/zxjj/gyzx/#> (last visited Oct. 15, 2018).

⁷ *Supra* note 6.

⁸ PROFILE: TODD STERN, WORLD RESOURCES INSTITUTE, <https://www.wri.org/profile/todd-stern> (last visited Oct. 15, 2018).

⁹ PROFILE: MANISH BAPNA, WORLD RESOURCES INSTITUTE, <https://www.wri.org/profile/manish-bapna> (last visited Oct. 15, 2018).

¹⁰ PROFILE: PAUL JOFFE, WORLD RESOURCES INSTITUTE, <https://www.wri.org/profile/paul-joffe> (last visited Oct. 15, 2018).

¹¹ *Supra* note 6.

¹² *Supra* note 2, at 1.

¹³ *Id.* at 5.

the United States. Accordingly, to assist the Committee in its continued oversight, please produce the following documents and information outstanding from the Committee's September 5, 2018 letter as soon as possible, but no later than 5:00 p.m. on October 22, 2018:

1. An explanation sufficient to demonstrate why FARA registration requirements do not apply to WRI;
2. All documents and communications with the Department of Justice, including but not limited to letters of inquiry or advisory opinions, referring or relating to FARA registration by WRI or its related tax-exempt organizations;
3. Documents sufficient to identify any remuneration, transaction, or contribution that involves WRI or its related tax-exempt organizations and any foreign entity, government, or individual, including their agents, representatives, or intermediaries from January 1, 2014 to present;
4. Documents sufficient to identify any policies or procedures WRI has implemented to ensure compliance with FARA registration requirements, including but not limited to:
 - a. Any policies or procedures your organization has implemented to ensure that funds from foreign sources are not used for political activities within the United States, unless disclosed as required by law; and
 - b. Any policies or procedures your organization has implemented to ensure that fundraising activities within the United States that are, in whole or in part, on behalf of or in the interests of a foreign government or entity are disclosed as required by law.
5. All reports, memoranda, policy proposals, or other documents prepared by WRI for a foreign principal¹⁴ or for non-public distribution to a government of a foreign country or other foreign entity referring or relating to WRI's political activities¹⁵ or proposed political activities within the United States from January 1, 2014 to present;
6. All documents and communications, including but not limited to, letters, emails, and any other written or electronic communication between WRI's Climate Program and any official, employee, or agent of the United States Department of the Interior, United States Environmental Protection Agency, and United States Department of State, including the Office of the Special Envoy for Climate Change, from January 1, 2014 to present referring or relating to the Paris Agreement, the U.S.-China Joint Announcement on Climate Change, or the 23rd Conference of the Parties to the United Nations Framework Convention on Climate Change;

¹⁴ As defined by 22 U.S.C. § 611(b).

¹⁵ As defined by 22 U.S.C. § 611(o).

7. All documents and communications, including but not limited to, letters, emails, and any other written or electronic communication between WRI's Climate Program and any official, employee, or agent of the Government of the People's Republic of China, including the National Center for Climate Change Strategy and International Cooperation (NCSC), the Ministry of Ecology and Environment, the Ministry of Natural Resources (and its predecessor agencies), the Ministry of Foreign Affairs, the Communist Party of China from January 1, 2014 to present referring or relating to the Paris Agreement, the 23rd Conference of the Parties to the United Nations Framework Convention on Climate Change, or the U.S.-China Joint Announcement on Climate Change;
8. A document sufficient to list all foreign visits, with corresponding dates, made by WRI referring or relating to the Paris Agreement or the U.S.-China Joint Announcement on Climate Change from January 1, 2014 to present; and
9. Documents sufficient to list all persons serving as senior leadership, policy experts, or members of the board of trustees who have or currently engage in any work by WRI referring or related to China from January 1, 2014 to the present.

Please deliver your response to room 1324 of the Longworth House Office Building. The Committee prefers if possible, to receive your response in electronic format. An attachment contains additional instructions for responding to the Committee's request.

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

Sincerely,



Rob Bishop
Chairman



Bruce Westerman
Chairman
Subcommittee on
Oversight and Investigations