

San Salvador, May 24th, 2012

SUBJECT: Rejection and demand for withdrawal of
El Salvador's R-PP by Indigenous Peoples

Benoît Bosquet

Coordinador

Forest Carbon Partnership Facility (FCPF)

Environment Department

World Bank

Washington

Mister Bosquet,

As the twenty-three Indigenous organizations and communities that make up the Salvadoran National Indigenous Coordinating Council^[1] (CCNIS), we support the letter sent to you by several social organizations in El Salvador on May 15th. Said letter rejects the document Readiness Preparation Proposal (R-PP) submitted by the Ministry of Environment and Natural Resources of El Salvador (MARN) to the World Bank Forest Carbon Partnership Facility (FCPF). Through this letter, we wish to reaffirm our rejection of the content of this proposal. Its design does not consider nor incorporate the concerns and needs of indigenous peoples of El Salvador regarding the impacts of and adaptation to climate change. In addition, the process that was held for the elaboration of the proposal did not guarantee indigenous peoples' right to free, prior and informed consultation, as defined under international laws for indigenous peoples' rights.

Although the R-PP submitted by MARN, incorporates a section on indigenous peoples of El Salvador, its contents does not include the progress made in international indigenous rights and the governments' commitments derived from it. For our brothers and sisters, the MARN approach regarding our peoples and communities is unfounded. It addresses our problems and challenges in a superficial and unacceptable way, as detailed by (but not limited to) paragraphs 8, 45 - 48, 53, 59, 65, 67, 69, 71 and 73 of the critical analysis document of the R-

PP. Said document is attached with this letter, and we request that it be placed on the website of the FCPF in its Spanish and English versions.

The negative impacts of climate change in El Salvador are increasing and causing damage and losses in our indigenous communities. Our homes, crops, and livelihoods have been reduced, damaged or destroyed, and we have already experienced negative impacts on health, food security, and incomes. Climate change is further restricting our rights regarding access, use and enjoyment of land in the territories where we live and conduct activities related to our survival, spirituality, and culture. The proposed R-PP in no way considers these negative impacts, nor considers the proposals that we as indigenous peoples can contribute to the country for the development and implementation of a National Strategy and Plan on Climate Change and a National Adaptation Plan. On the contrary, the R-PP is not based on a precautionary principle, and would be promoting actions that would cause maladaptation in our territories, showing that the "Mitigation based in Adaptation" approach is inconsistent with the ultimate goal of a National Adaptation Strategy

The issue of climate change has been a priority in CCNIS' work plan because on the one hand, indigenous peoples are the most vulnerable and affected by climate change. Moreover, many of the mitigation policies and measures taken constitute hazards for indigenous people and could cause us greater vulnerability and maladaptation. Similarly to biofuels, REDD-plus schemes have been seriously questioned by our indigenous peoples for the serious negative impacts that they could cause us, particularly by increasing restrictions on access to land and its resources and promoting the large-scale plunder of our indigenous territories. To prevent such impacts, indigenous peoples have fought for the inclusion of specific safeguards in policies, programs, guidelines and agreements that are related to us to ensure respect for our specific rights.

On the contrary, the MARN's R-PP does not address or incorporate the issue of the seven environmental and social safeguards adopted in Cancun for the implementation and proper assessment of environmental and social impacts of REDD-plus strategies. Three of these safeguards are specific to indigenous peoples, and propose: a) respect for the knowledge and rights of indigenous people, considering the international obligations related to the issue, b) the full and effective participation of all stakeholders, particularly indigenous and local communities, and c) that REDD-plus be consistent with and encourages the conservation of natural forests, biodiversity, ecosystem services and social and environmental benefits, and considers the need for sustainable livelihoods by indigenous peoples and local communities as well as their interdependence with forests. MARN's R-PP does not incorporate the operational policy (OP 4.10) or the procedure guidelines (BP-4.10) of the World Bank related to indigenous peoples, which apply to all projects in which the project concept note is reviewed.

The CCNIS proposes that World Bank safeguards such as those adopted in Cancun and Durban be incorporated by all R-PP bidding governments. Despite the fact that the FCPF does not require governments bidding on REDD-plus projects to incorporate the seven safeguards previously mentioned, in the design and implementation of national REDD-plus strategies, governments are obliged to fulfill their commitments under the Cancun Agreement (App. I, dec. 1/CP.16). They should incorporate not only the safeguards contained in the operational policy and rules of procedure of the World Bank, but the seven safeguards from Cancun for monitoring, reporting and verification (MRV) systems of national REDD-plus strategies. As indigenous peoples of El Salvador, we expect our government to adopt the voluntary guidelines on responsible governance of land tenure, fisheries, and forests in the context of national food security, adopted by the Food Security Committee of the FAO.

For indigenous peoples it is essential that all policy instruments on climate change, including the National Climate Change Plan, the National Adaptation Plan, and an eventual National REDD-plus Strategy, respect international indigenous rights, particularly the provisions contained in the United Nations Declaration on the Rights of Indigenous Peoples (2007) and the rules and jurisprudence of the Interamerican Human Rights System regarding the right to lands, territories, and resources that we have traditionally owned, occupied, used or acquired, and the right to own, use, develop and control the lands, territories and resources that we have because of traditional ownership or acquisition.

CCNIS demands that the MARN withdraw its R-PP from the FCPF, respect for the rights of indigenous peoples of El Salvador, and the fulfillment of the Cancun and Durban commitments by developing a National Strategy and Plan on Climate Change and a National Adaptation Plan (PAN for its initials in Spanish), based on a broad, participatory and transparent process, including participation and the free, prior and informed consent of indigenous peoples and vulnerable populations, from which the relevance and role of REDD-plus be defined in a sovereign manner.

On behalf of our brothers and sisters, we await your response to our demand, which we also extend to the Environment and Natural Resources Ministry of El Salvador.

Betty Pérez

Coordinadora Nacional

CCNIS

Cc:

- Leslie Quiñónez, Technical Subsecretary of the Presidency of the Republic
- Management Team, FCPF
- Joëlle Chassard, Manager, Carbon Finance Fund, World Bank
- Gerardo Segura, Agriculture and Development Team, Latin America and Caribbean Region, Environment Department, World Bank
- Alberto Leyton, Representative, World Bank Office in El Salvador.
- Ken Andrasko, Rajesh Koirala, Peter Saile, Stephanie Tam, Raju Koirala, Ken Andrasko y Leonel Iglesias, World Bank
- Laszlo Pancel, Coordinator, REDD-GIZ Regional Program
- Pedro Peña, Resident Representative, FAO, El Salvador
- Herman Rosa, Minister of Environment and Natural Resources, El Salvador
- Guillermo López, Minister of Agriculture and Livestock, El Salvador
- Raúl Artiga, Climate Change Coordinator, Central American Commission of Environment and Development (CCAD in Spanish)
- Gustavo Pineda, Dirección de Pueblos Indígenas, Secretaría de Cultura de la Presidencia de la República
- Chris Lang, Director, REDD-Monitor

[1] On a national level, CCNIS is part of the following political platforms: the Economic and Social Council (CES), the Social Front for a New Country, the Agricultural Working group, The Anti-Transgenic Network, the Forum for the Defense of the Constitution (FDC) and Working group for the defense of Indigenous peoples rights of the Human Rights Ombudsman in the Central American Integration System (SICA). CCNIS is part of the organizational structure of the Central American Indigenous Council (CICA) of which currently holds the presidency, and on an international level it is a member of the Indigenous Fund (FONDIN) and the Biodiversity Forum.