The REDD Readiness Preparation Proposal (R-PP) prepared by the Central African Republic (CAR) was submitted informally to Forest Carbon Partnership Facility (FCPF) on 15 January 2011. The document was discussed informally at the eighth meeting of the Participants Committee (PC8) FCPF on 25 March 2011 in Vietnam.

Following this discussion, various commentators including those involved in the Central African civil society, analyzed and commented on the R-PP and made recommendations that would allow CAR to improve the content of this national document. On 1 August 2011, CAR formally submitted its R-PP to be discussed at the tenth meeting of the Participants Committee (PC10), 18 October 2011 in Berlin, Germany.

In this context, civil society organizations, members of the Platform of Central African Civil Society for the Sustainable Management of Natural Resources and Environment (*La Plateforme de la Société Civile Centrafricaine pour la Gestion Durable des Ressources Naturelles et l'Environnement*), met in a workshop from 11 to 13 October 2011 in Bangui to examine this version of the document. About thirty participants representing civil society organizations and Bayaka and Mbororo indigenous peoples took part in this meeting.

After this three-day workshop, participants made the following statement on the latest version of the R-PP, modified on 28 September 2011, and focused on four main themes:

- Consultation and governance of REDD in CAR;
- Legal framework in CAR and sharing the benefits of REDD;
- Causes of deforestation and degradation, social and environmental impacts;
- REDD Strategy Options.

We, workshop participants, congratulate the CAR government for its positive engagement in national processes aimed at the sustainable management of forest resources and the promotion of the rights of indigenous peoples. This is reflected particularly in the Voluntary Partnership Agreement on the implementation of Forest Law Enforcement Governance and Trade (FLEGT), the Reducing Emissions from Deforestation and Degradation (REDD) process, the implementation of Convention 169 of the International Labour Organisation (ILO) concerning Indigenous and Tribal Peoples and, finally, the process for the allocation of community forests in order to involve and to empower communities in the management of forest resources in accordance with the provisions of articles 133 to 139 of CAR's 2008 Forest Code.

We recognize and appreciate the improvement of the contents of the latest version of the R-PP in which some of our concerns, voiced in a statement from 19 March 2011, were taken into account. These include improved representation of indigenous peoples in the National REDD+ Committee (CN REDD+) (p. 13), and the upward revision of the budget of some components, particularly the budget for social and environmental impacts and the multiple benefits, up from 0.3% to 0.6% of the R-PP budget (p. 105). We, therefore, encourage the efforts made by the CAR government in this regard. However, we found that some weaknesses remain.

We note a certain shortcomings related to participation and consultation by the CAR government vis-à-vis civil society, and equally a lack of dialogue and coordination between government departments themselves. For example:

- In the strategy option 3 (p.59), the R-PP suggests the expansion of logging in the forest of the south-east. This policy is not supported by the Ministry of Water and Forestry, the department empowered to decide on the granting of a *Permis d'Exploitation et d'Aménagement* (PEA, management permit for logging concessions);
- Component 2c which deals with the reform of the legal framework for the implementation of REDD+ does not refer to the current revision of the Land Code (*Loi* portant Code Domanial et Foncier) coordinated by the Ministère de l'Urbanisme. This text will be of central importance for land rights in the CAR;
- Two "REDD" pilot projects in CAR on community forests and wood energy were approved by the Congo Basin Forest Fund (CBFF) in June 2011 for a total of € 2.7 million funding. However, these pilot projects are not mentioned in the R-PP.

We recommend that these relevant Ministries and the High Commissioner for Human Rights, responsible for leading the implementation of Convention 169 of the International Labour Organisation (ILO) in CAR, are closely involved in the implementation of REDD .

We consider that the process of developing the R-PP has not been sufficiently participatory. Recommendations and contributions of civil society made during meetings organized by the government, and contained in civil society statements, have been only marginally taken into account in the document. 'Consultations' held in Bangui and the provinces do not reflect the right to consultation and participation covered by articles 6 and 7 of ILO Convention 169 and of principles of free, prior and informed consent in United Nations Declaration on the Rights of Indigenous Peoples. We consider that these have been more information-sharing sessions than consultations. Similarly, no consultations specifically for indigenous peoples have been organized during the development of the R-PP, despite the fact that they are key stakeholders in the process.

Following the recommendations already included in our statement of March 2011:

- We restate the importance of civil society being represented in the National Committee on REDD+ by four representatives instead of two as currently planned (p.13). Furthermore, we would like to see the Platform of Central African Civil Society for the Sustainable Management of Natural Resources and Environment named as the entity designated to submit the names of these representatives. This is all the more important because currently the National Committee will be composed in the majority by representatives of the government or parastatal organizations;
- We believe that the frequency of meetings and the budget allocated to the National Committee on REDD+ are far from sufficient to enable the Committee to be able to accomplish the many tasks given to it in the R-PP and to fully play the role of the "paramount entity" of REDD in CAR (p. 13);
- We believe that the decisions of the CN REDD+ should be adopted by consensus and not by a majority of two-thirds as foreseen in the R-PP (p. 13);
- We ask that the minutes of the meetings of the CN REDD+ and REDD+ Inter-Prefectural Committees (CIP REDD+) be made available to the public within one month, at the most, of the meetings;
- To ensure transparency and governance in the process, we call again for REDD revenues to be managed by a "REDD Fund" created for the purpose and involving civil society. We

- regret that the current version of R-PP continues to insist on accommodating these revenues in the National Environmental Fund (FNE), which is to be managed by a committee composed entirely of members of government and administration (pp. 15-16):
- We are concerned about a provision in the document which states that a draft text on the "establishment, organization and operation of the REDD+ National Committee" is about to be signed into law and "should be operational before the Berlin session" (p. 69). Civil society has at no point been informed or consulted on the contents of this text.

We are proud that CAR is the first African country to ratify ILO Convention 169. This Convention should have an impact on all topics included in this statement: the process of consultation with indigenous peoples, the policy options chosen, the reform of the legal framework and the alignment of national laws with the provisions in the Convention. However, these provisions have not been addressed systematically in the R-PP. Therefore:

- We recommend the revision of land law in CAR in order to guarantee to local communities and indigenous peoples use and ownership rights of the forested lands and resources, so as to benefit fully from REDD+. This would include the removal of all fees and taxes related to formalities of land titling;
- We see from box related to the proposed Agro-pastoral Code, it is envisaged that "unoccupied or obviously underexploited lands would fall under the State jurisdiction, divided in plots for sale or rent" or be attributed to "industrial operators" (p. 67). We fear that this provision could impact land traditionally occupied by Bayaka and Mbororo;
- Central African land law should recognize the rights to land and resources (including landed property) of indigenous peoples;
- We also recommend that relevant legal texts be translated into Sango (national language of the CAR) to facilitate the understanding of all.

The industrial logging is not mentioned in the R-PP as a direct cause of deforestation and forest degradation (pp. 51-54). However, given the size forest area in the southwest subject to the industrial logging (11 concessions covering approximately 3 million hectares) and the weak enforcement of legislation relating to forest management, industrial logging should, by necessity, be considered a major and direct cause of deforestation and degradation.

It is regrettable that the R-PP attributes a greater share of the responsibility for deforestation and forest degradation to forest communities. We acknowledge, certainly, the role of played by populations around major towns, but we maintain that pastoralism (extensive livestock farming), shifting cultivation and collection of non-timber forest products are not the main causes of deforestation and forest degradation, contrary what is stated the R-PP (pp. 46-48).

We note that studies on the drivers of deforestation included in the R-PP will only consider those causes already identified in the document (p. 53). We believe this would prejudge the outcome. For this reason, we recommend that participatory studies be carried out that are able to include all possible causes of deforestation and degradation in their mandate.

Social and environmental impact studies are paramount and essential prerequisite for the implementation of REDD pilot projects.

The lack of coherence between VPA/FLEGT and the REDD+ strategy does not aid a clear understanding of the national strategy for the forestry sector.

The R-PP suggests the expansion of logging in the forested area of the southeast, the Bangassou Forest (pp. 58-59). However, these forests remain among the last primary forests in the country. As such, civil society encourages an enhancement of this heritage which excludes any form of industrial exploitation.

We reaffirm that indigenous and local communities should be involved in the strengthening and management of protected areas (p. 57), through participatory mapping.

We remain open to dialogue and consultation with all stakeholders for the successful completion of the REDD process in the national interest.

Done in Bangui, 13 October 2011

Signed by:

Action pour les Initiatives de Développement des Communautés Rurales (AIDECOR) Amis de la nature (AN)

Association Centrafricaine des Professionnels en Evaluation Environnementale (ACAPEE)

Association de Vulgarisation de Droit et d'Education Civique en RCA (AVUDEC/RCA)

Association des Femmes Juristes de Centrafrique (AFJC)

Association des Maman de Gbazabangui (AMG)

Association des Jeunes pour la Protection des Forêts dans le Cadre du Changement Climatique (AJPFCC)

Association Droits et Développement des Peuples Autochtones de Centrafrique (ADPAC)

Association pour la Défense des Intérêts des BaAka de Centrafrique (ADIBAC)

Action Verte (AV)

Centre d'Information Environnemental pour le Developpement Durable (CIEDD)

Centre de Recherche et d'Appui au Développement (CRAD)

Comité pour le Développement Intégré des Communautés de Base (CODICOM)

Coordination Nationale du Programme des Peuples Non Atteints (CONAPPENA)

Femme et Environnement Bata Gbako

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Groupement des Agriculteurs et Eleveurs de Boali et Bimbo (GAERBB)

Groupement des Agriculteurs pour la Lutte Contre la Désertification et la Pauvrété (GALDP)

Jesus pour les Pygmées d'Afrique Centrale (JAPAC)

Maison de l'Enfant et de la Femme Pygmées (MEFP)

Mbororo Social and Cultural Development Association (MBOSCUDA)

Mur-Africa Universel (MAU) Organisation Centrafricaine des Droits de l'Homme (OCDH) Organisation Centrafricaine pour la Défense de la Nature (OCDN) Réseau Jeunesse Centrafrique pour la Culture de la Paix (REJECAP)

Translation from the French provided by Rainforest Foundation UK, please refer to the original for any necessary clarification.