CAMBODIAN CSOS AND NGOS CONCERNS OVER CAMBODIA READINESS - PROPOSAL PREPARATION (R-PP)

We, Cambodian NGOs and Civil Society Organization present their compliments to the Cambodian (Interim) REDD Task Force led by the Forestry Administration (FA), who is leading the Cambodian delegation in presenting the Cambodia R-PP for approval of the Forest Carbon Partnership Facility (FCPF).

We acknowledge that more visible efforts (as compared to previous forestry policy processes) have been made to be inclusive in the REDD roadmap development, which formed the basis of the R-PP presented. National level consultations have been conducted and especially for Cambodian CSOs and indigenous communities consultative workshop on 02-03 September 2010 which open the way for communities and NGOs to comment on R-PP. Albeit more visible and comparatively more open than others, the process was constrained by a tight timeline and insufficient debate on the governance —related concerns and the principles that should ground REDD readiness and piloting.

Very recently, communities around Prey Lang, one of the last remaining primary forests in Cambodia, a wide expanse of lowland evergreen and semi-evergreen forests, staged a peaceful protest against Vietnamese Economic Land Concession (ELC) companies, CRCK and PNT, for forest clearance activities in an area of almost 20,000 hectares in Prey Lang area. In this instance, 3 major issues and concerns have surfaced: (1) clearance of primary forests by ELCs; (2) intimidation of communities by local and government authorities; (3) loss of land and resources that are providing for traditional livelihoods. ELCs is a major hindrance for the REDD to move forward in Cambodia. In addition, in 2010 government-to-government deals allocated 100,000 hectares in Cambodia to companies under the umbrella of the Vietnamese Rubber Enterprise Federation (VREF) for the development of rubber plantations. VREF represents 14 companies and announced its plans to grow rubber by 2012 on 100,000 hectares throughout the country. To date the VREF's plans include 8,900 hectares of rubber will be grown in Kampong Thom, 7,500 hectares in Kratie, 1,500 hectares in Ratanakiri, 1,100 hectares in Stung Treng, and 1,000 hectares in Preah Vihear. Other locations of future plantations have not been disclosed publicly.

Moreover, around 40,000 hectares are also threatened to be logged to give way to a rubber plantation, in the Virachey National Park, a declared protected area and home to majority indigenous communities in Ratanakiri province.

These are not isolated cases but a trend of rising vulnerability of communities and their traditional livelihood and which is the backdrop of the REDD readiness process that the RPP will need to explicitly address.

The current state of forest governance and policy enforcement, and the extent of current conflicts and overlaps in land and resource uses are critical points in the R-PP review. As considered to be a high forest cover, high deforestation country, FA statistics showed that 379 hectares were lost between 2002-2005 at a rate of 0.8% per year, and with a rising trend of deforestation brought by land use change through economic land concession allocation and their activities, governance arrangements and a policy mandate that seeks to safeguard community rights, livelihood and biodiversity need to be explicit both in the statement of principles of R-PP as well as in its substance.

The role, and present threat of Economic Land Concessions to communities, the erosion of their rights, and the erosion of the integrity of other policy frameworks such as on protected areas and of community forestry must be tackled. We believe that the threats posed by the indiscriminate granting of ELCs are considerable enough to warrant conditions for approval of the R-PP. These conditions are provided not on account that we question the goal for Cambodia's REDD Readiness, instead they are to ensure that the viability of achieving that goal does not suffer the same fate of being eroded.

We, NGOs and CSOs in Cambodia submit the following concerns and recommendations on R-PP:

- Provide a clear and robust legal framework of for community tenurial and resource use rights. Such legal framework will need to resolve conflict and overlaps across tenurial and resource use instruments, and include mechanisms for communities to seek redress in cases of conflict.
- Identify explicitly that economic land concessions, mining concessions, Special Economic
 Development Zones and large-scale hydro-electricity dams are direct drivers of deforestation and
 forest degradation in Cambodia.

We call on the cancellation of ELCs, especially immediately those that are impinging on existing community / protected areas. The protection of natural forests and natural resources is paramount to REDD+ and fundamental to achieving environmental sustainability.

- 3. Consultation and participation: the TOR for Consultation Group must be constituted/included in the REDD management and consultation arrangement.
 - Explain what mechanisms or resources are in place for training and educating indigenous groups, local villagers, and local and provincial officials on REDD.
- 4. Provide clear and strong provisions that will safeguard forest communities from being displaced or evicted from the forest land. These safeguards from eviction and displacement would redound also to safeguarding community rights to food, water and livelihood, provided for by their land and forest, and the various environmental services afforded from these.

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