



Graham Creek, Crique Sarco, Conejo Creek, Midway, Santa Teresa

November 4, 2013

Ms. Ellysar Baroudy
Forest Carbon Partnership Facility (FCPF) Coordinator
World Bank Headquarter
1818 H Street, NW Washington, DC 20433 USA

Dear Ms. Baroudy,

As affiants in the *SATIIM, et al vs The Government of Belize* case that was concluded before Supreme Court on October 23, 2013 for which we await a ruling, we want to categorically state that we do not support the implementation of REDD+ program in Belize at this time. Our concerns are outlined in detail below:

Summary

Belize's draft R-PP fails to take into account our collective ownership rights of our lands and resources as indigenous peoples in Belize, and ignores the ongoing failure of the government to demarcate, title, legalize, and protect our indigenous lands, in violation of rulings of domestic courts and contrary to recommendations of the Inter-American Commission on Human Rights. The legal context of indigenous peoples' land rights in Belize, and in particular our status as Maya communities in Southern Belize, has far-reaching implications for REDD activities – impacting issues ranging from the risk of land conflict and human rights violations, to the requirements for benefit-sharing, to the verifiability of emissions credits. The lack of protection of our indigenous peoples' ownership rights in Belize means that REDD poses substantial risks to our communities, which must be fully examined and planned for in a viable R-PP.

National REDD programs must respect indigenous rights

REDD activities in Belize are governed by the REDD safeguards under the United Nations Framework Convention on Climate Change (UNFCCC). Both the FCPF Charter and the UNFCCC Cancun Agreements require respect for the rights of indigenous peoples, including under applicable international agreements and obligations.¹ The UN Declaration on the Rights of Indigenous Peoples, endorsed by Belize, is the international legal standard for protecting the rights, territories, and livelihoods of indigenous peoples. The Declaration establishes the obligations that must be observed in

¹ International Bank of Reconstruction and Development Charter Establishing the Forest Carbon Partnership Facility, May 11, 2011, art. 3, § 3.1.(d); UNFCCC Conference of the Parties, Nov. 29-Dec. 10, 2010, The Cancun Agreements: Outcome of the work of the Ad Hoc Working Group on Long-term Cooperative Action under the Convention, appendix 1(2), FCCC/CP/2010/7/Add.1 (Mar. 15, 2011).

activities and programs that will affect indigenous peoples and their lands, territories, environment and natural resources, including REDD.

Indigenous Peoples' permanent sovereignty and collective ownership of their lands and resources

Under international law, indigenous peoples have permanent sovereignty over their natural resources (PSNR). According to the UN Special Rapporteur on the Rights of Indigenous Peoples, PSNR is the principle of international law that “[p]eoples and nations must have the authority to manage and control their natural resources and in doing so to enjoy the benefits of their development and conservation.”² Indigenous peoples’ PSNR entails “legal, governmental control and management authority over natural resources, particularly as an aspect of the right to self-determination.”³ PSNR is enshrined in core international treaties⁴ and the UN Declaration,⁵ among other instruments.⁶

As stated in the UN Declaration, Indigenous peoples have the right to own, use, develop, and control the lands, territories and resources that they possess by reason of traditional ownership or other traditional occupation or use, as well as those which they have otherwise acquired.”⁷ Although indigenous peoples may not hold formal title, their ownership of the land by reason of long-standing possession, occupation, or use is recognized in international law.⁸

The content of indigenous peoples’ right to land is that of full ownership. Generally speaking, ownership gives the right-holder the power to control, manage, use and enjoy the fruits of the land, including the right to convey it to others.⁹ This is different than a diminished right to land, such as a right of use or usufruct, which are usually limited in time.¹⁰ For these reasons, the Inter-American Court has stated that domestic laws that only recognize mere use and/or usufruct rights with regard to indigenous peoples’ land, instead of full collective ownership, violate Article 21 (Right to Property) of the American Convention on Human Rights.¹¹

Indigenous peoples’ ownership right to land is collective, not individual, according to the UN Declaration, the ILO Convention and regional human rights law.¹² In a landmark case relevant for

² U.N. Special Rapporteur, Erica-Irene Daes, *Prevention of Discrimination and Protection of Indigenous Peoples: Indigenous Peoples' Permanent Sovereignty Over Natural Resources*, para. 40, 54, 58, U.N. E/CN.4/Sub.2/2004/30 (July 13, 2004), at 6.

³ *Id.* at 18.

⁴ International Covenant on Civil and Political Rights, G.A. Res. 2200A (XXI) (Dec. 16, 1966), at 1; International Covenant on Economic, Social and Cultural Rights, G.A. Res. 2200A (XXI) (Dec. 16, 1966), at 1.

⁵ U.N. Declaration, *supra* note 14, at 4, 8, 26, 27, 28, 29, 30, 32.

⁶ See e.g. Organization of African Unity, African Charter of Human and People’s Rights, art. 1 (June 27, 1981), at 21; Convention on Biological Diversity, 1760 UNTS 79 (1992), at 3; United Nations Conference on the Human Environment Stockholm, June 16, 1972, *Stockholm Declaration*, at principle 21, A/CONF.48/14; UNFCCC, FCCC/INFORMAL/84 (May 9, 1992), at prmb1, para. 8; United Nations Conference on Environment and Development, Aug. 12, 1992, *Rio Declaration*, at principle 2, A/CONF.151/26 (vol. I); Vienna Convention on the Succession of States in Respect of Treaties, A/CONF.80/31 (Aug. 22, 1978), at 13, as corrected by A/CONF.80/31/Corr.2 (Oct. 27, 1978).

⁷ U.N. Declaration on the Rights of Indigenous Peoples, G.A. Res. 61/295, U.N. Doc A/RES/61/295 (Sept. 13, 2007), art. 26(2).

⁸ U.N. Declaration, *supra* note 7, at 26.

⁹ *Black's Law Dictionary*, (13th ed.), at 1138.

¹⁰ *Id.* at 1580.

¹¹ Case of the Saramaka People v. Suriname, Inter-Am. Ct. H.R. (Ser. C) No. 172 (Nov. 28, 2007), at 116.

¹² U.N. Declaration, *supra* note 7, at 26(2) (stating that “[i]ndigenous peoples have the right to own...the lands, territories and resources that they possess”); International Labor Organization, Convention Concerning Indigenous and Tribal Peoples in Independent Countries [ILO Convention 169], June 27, 1989, at 4(1), available at <http://www.ilo.org/ilolex/cgi->

REDD, the Inter-American Court set the governing legal principle by stating that such "ownership of the land is not centered on an individual but rather on the group and its community."¹³ For more than ten years, the Court has maintained this standard as the state of the law.¹⁴

Prior to implementing any REDD initiatives, States must take measures to prevent harm to indigenous peoples' governmental and legal control and management authority over their lands and natural resources. In that same case, the Inter-American Court held that the State has an obligation to carry out the delimitation, demarcation, and titling of an indigenous community's lands and that until that was done "the State must abstain from any acts that might affect the existence, value, use or enjoyment of the property..." either directly or through the acts of third parties.¹⁵ While land titling is not a simple endeavor, as the Inter-American Commission has asserted, "the complexity of the matter is no excuse for the State to consider or administer untitled indigenous lands as State lands."¹⁶

The status of Maya land rights in Belize and recent legal history

The collective ownership rights of the Maya people of Southern Belize over their lands, territories, and resources has been affirmed by domestic courts, administrative measures, and international bodies. The Government of Belize (GOB), however, does not accord Maya communities the same protection as other property owners. Maya communities' lands have not been demarcated, lack title, and are increasingly threatened by the establishment of conservation areas and logging and oil concessions, imposed without their consent. Many areas of national policy still treat Maya lands as "National Lands."

In 2000, the GOB negotiated with Maya leaders a "Ten-Point Agreement," wherein it affirmed "that the Maya People have rights to lands and resources in southern Belize based on their longstanding use and occupancy."¹⁷ This assertion by the government has been relied upon in subsequent domestic cases as admission of Maya land rights.¹⁸ In addition, the GOB committed to establish in partnership with Maya leaders a program "to address the urgent land needs of the Maya communities of the south, including the surveying and distribution of lands or establishing and protecting communal lands," as well as a framework to resolve "sustainable management of natural resources within the 'Maya traditional land use areas' and equitable distribution of their benefits amongst the Maya communities."¹⁹ It additionally provided for a review by the new partnership of matters relating to applications for licenses for logging or oil exploration or extraction, in the context of "their social environmental and cultural impacts." The Agreement concluded that "the GOB and the Maya leaders will treat and use

lex/convide.pl?C169, at art. 13; African Charter on Human and Peoples Rights *supra* note 6, art 14.

¹³ *Mayagna (Sumo) Awas Tingni Community v. Nicaragua*, Inter-Am. Ct. H.R. (ser. C) No. 79, (Aug. 31, 2001), at para. 149.

¹⁴ *See Case of the Kichwa Indigenous People of Sarayaku v. Ecuador*, Inter-Am. Ct. H.R. (Ser. C) No. 245 (June 27, 2012); *case of the Xákmok Kásek Indigenous Community v. Paraguay*, Inter-Am. Ct. H.R. (Ser. C) No.214 (Aug. 24, 2010); *Case of the Saramaka People v. Suriname*, *supra* note 11; *Case of the Yakye Axa Indigenous Community v. Paraguay*, Inter-Am. Ct. H.R. (Ser. C) No. 146 (June 17, 2007); *Case of the Sawhoyamaya Indigenous Community v. Paraguay*, Inter-Am. Ct. H.R. (Ser. C) No.146 (Mar. 29, 2006); *Case of the Moiwana Community v. Suriname*, Inter-Am. Ct. H.R. (Ser. C) No.124 (June 15, 2005).

¹⁵ *Case of Mayagna (Sumo) Awas Tingni Community v. Nicaragua*, *supra* note 13, at 4.

¹⁶ Inter-Am. Comm'n H.R., *Indigenous and Tribal Peoples' Rights over their Ancestral Lands and Natural Resources: Norms and Jurisprudence of the Inter-American Human Rights System* 34, OEA/Ser.L/V/II, Doc. 59/09 (Dec. 30, 2009).

¹⁷ Ten-Point Agreement between the Government of Belize and the Maya Peoples of Southern Belize, signed by the State and Maya leaders on October 12, 2000.

¹⁸ Civil Appeal No. 27 of 2010, Ct. of Appeal of Belize 2011, at para. 304.

¹⁹ Ten-Point Agreement between the Government of Belize and the Maya Peoples of Southern Belize, signed by the State and Maya leaders on October 12, 2000.

this agreement as the new basis for the resolution of issues of concern to the Maya Leaders and will by mutual agreement, expand, amend or develop more specific agreements within the framework of this general agreement.” The commitments in the Agreement, however, remain unfulfilled.

In 2004, in a case brought by two Maya communities harmed by oil and logging concessions on their lands, the Inter-American Commission on Human Rights, an organ of the Organization of American States (OAS) tasked with supervising the fulfillment of State obligations under the OAS Charter, ruled that the Maya people of southern Belize have a communal property right to the lands that they have traditionally used and occupied.²⁰ The Commission found the GOB in violation of the right to property, to equality before the law, to equal protection of the law, and to nondiscrimination by failing to take effective measures to recognize and protect the Maya peoples’ communal property rights.²¹ The Commission issued recommendations that the GOB delimit, demarcate and title or otherwise clarify and protect the Maya’s collective territory, in accordance with their customary land use practices, and that until then, it abstain from any acts that might directly or indirectly affect the existence, value, use or enjoyment of the property located in the area occupied and used by the Maya people.²² The government failed to implement the ruling

In 2007, the decision of the Commission was echoed by the Supreme Court of Belize which ruled that Maya villages and villagers in the Toledo District have property rights over the lands they use and occupy according to their customary land tenure system, and that these property rights are protected under the Constitution. The Court found that the failure to provide formal protection for these rights violates constitutional protections against discrimination and guarantees of life and security. The Court ordered the government to demarcate and title Maya lands, and refrain from authorizing concessions without the consent of the indigenous communities. The GOB, however, construed the ruling to apply only to the two claimant communities, continuing to grant concessions on Maya lands.

In response, in 2010, in a case brought by the Maya Leaders Alliance and the Toledo Alcaldes Association on behalf of the 38 Maya communities of Southern Belize, the Supreme Court re-affirmed its 2007 decision and confirmed that Maya customary land rights exist in all the Toledo Districts and where they exist they give rise to collective and individual property rights under the Belize Constitution. The court again ordered the government to create the procedures to identify and protect these Maya land rights, and until such time as that protection is achieved, to abstain from any acts which might adversely affect the existence, value, use or enjoyment of lands in the Toledo District occupied and used by the Maya people.

The government appealed the 2010 decision, and in July 2013, the Court of Appeals again upheld the land rights of the Maya of Southern Belize. The Appeals Court however, ruled that the Constitution did not impose a positive obligation on the government of Belize to protect Maya land rights and so struck the orders from the 2010 decision requiring the establishment of a process for titling and prohibiting actions which would impair the use or enjoyment of the Maya people’s land rights. The Appeals Court decision is inconsistent with international law, which recognizes the duty of States to adopt domestic measures to adjust domestic laws and policies to the minimum human rights standards arising from international law,²³ and in particular to adopt special measures to safeguard the collective rights of

²⁰ Maya Indigenous Communities of the Toledo District, Case 12.053, Inter-Am. C.H.R. Report 40/04 (2004) (Belize), para. 151.

²¹ *Id.* at para. 152, 171.

²² *Id.* at para. 197.

²³ *See* International Covenant on Economic, Social and Cultural Rights, G.A. Res. 2200A (XXI) (Dec. 16, 1966) at 2(1);

indigenous peoples,²⁴ especially where indigenous peoples' land and resources are concerned. The 2010 decision also runs counter to the finding of the Inter-American Commission that "the communal property right of the Maya people is interpreted in accordance with "the obligation to take special measures to ensure recognition of the particular and collective interest that indigenous people have in the occupation and use of their traditional lands and resources."²⁵

In response to the failures of the Belize government and domestic court system to afford justice to indigenous peoples, indigenous organizations have been granted leave by the Court of Appeal to take the matter to the Caribbean Court of Justice. At the same time, SATIIM and our communities Graham Creek, Crique Sarco, Conejo Creek, Midway have pending claims in the Belize Supreme Court where we are asking the court to enforce our Maya Customary rights to our lands and its resources which further give rise to rights to Free Prior and informed Consent. We enclose our press release for your information

The invisibility of indigenous land rights in Belize's R-PP

Lack of protection measures and recognition of Maya peoples' collective ownership of their lands and resources creates significant risks that aren't assessed in the R-PP. The R-PP doesn't acknowledge Maya customary tenure systems or discuss their legal status under Belize law. In fact, the R-PP doesn't discuss indigenous lands at all. The R-PP's discussion of governance states that the "forests/vegetation of Belize can be grouped into four broad categories, National Lands, Forest Reserves, National Parks, and Private (owned) properties," seemingly construing indigenous lands as National Lands, though this would contradict jurisprudence by domestic courts and international bodies.²⁶ Similarly, a table of Timber Production Areas does not mention indigenous peoples' lands, reservations, nor indigenous peoples' community forest enterprises.²⁷ While the R-PP notes that existing forest law and policy "lacks consideration for forest dependent people and their livelihoods...and indigenous rights,"²⁸ it provides no detail as to the content of those rights or the status of recognition or protection by the GOB.

The failure of the government to fully recognize Maya land rights, in violation of domestic and international law, creates an environment of extreme legal uncertainty regarding the lands and resources in Southern Belize, precisely where much of REDD activities would take place.²⁹ Belize's official land titling system, in other words, does not correspond with actual land use.³⁰ This threatens the rights of indigenous peoples, the verifiability of any emissions credits, the identification of rights-holders and beneficiaries, and the sustainability of any REDD regime or transactions. Additionally it

International Covenant on Civil and Political Rights, G.A. Res. 2200A (XXI) (Dec. 16, 1966) at 2(2); U.N. Declaration on the Rights of Indigenous Peoples, G.A. Res. 61/295, pmbL., U.N. Doc A/RES/61/295 (Sept. 13, 2007), at 38; American Convention on Human Rights, Organization of American States, American Convention on Human Rights, Nov. 22, 1969, O.A.S.T.S. No. 36, 1144 U.N.T.S. 123, at 2; African Charter of Human and People's Rights, *supra* note 6, at art. 1.

²⁴ See ILO Convention 169, *supra* note 12, at 4(1) (stating that "[s]pecial measures shall be adopted as appropriate for safeguarding the persons, institutions, property, labor, cultures and environment of the peoples concerned").

²⁵ Maya Indigenous Communities of the Toledo District, *supra* note 20, para. 131.

²⁶ Belize R-PP September 13, 2013, at p. 36.

²⁷ *Id.* p. 36.

²⁸ *Id.* p. 33.

²⁹ Maya Indigenous Communities of the Toledo District, *supra* note 20, para. 170, (stating that the failure of the GOB to recognize and guarantee Maya land rights has resulted in "a climate of uncertainty among the members of the Maya communities.")

³⁰ Claims No. 171 and 172 of 2007, Aurelio Cal and Manuel Coy et al v. The Attorney General of Belize and the Minister of Natural Resources and Environment (Oct. 18, 2007), para. 75.

raises serious concerns regarding respect for human rights and the rule of law in Belize, as well as the country's legal and institutional readiness to administer a REDD program.

The R-PP, however, doesn't discuss the tenure insecurity that permeates indigenous land and resource rights in Belize or the impact of this uncertainty on REDD initiatives. In fact, the R-PP does not describe how these social, environmental, or human rights risks will be assessed and addressed.

Maya lands must be legally protected prior to REDD implementation

REDD projects will necessarily affect the land and resource rights and interests of Maya communities. Just as the Commission held that Belize violated the right to property by granting logging and oil concessions over property and resources that could fall within untitled Maya customary lands,³¹ the GOB has a duty to demarcate and protect Maya lands prior to implementation of any REDD projects.

The UN Declaration states that States shall give legal recognition and protection to the lands, territories and resources that indigenous peoples possess by reason of traditional ownership or other traditional occupation or use, as well as those which they have otherwise acquired. Such recognition shall be conducted with due respect to the customs, traditions and land tenure systems of the indigenous peoples concerned.³² These requirements are supported by the UNFCCC Cancun Agreements and the FCPF Charter. The World Bank's Operational Policy on Indigenous Peoples (OP 4.10) additionally requires borrowers to pay particular attention to the customary rights of indigenous peoples.

Indigenous peoples' land and resource rights are determinative for several aspects of REDD

The regularization of Maya land rights is determinative of numerous aspects of REDD initiatives, including the following:

FPIC. Full respect and protection for Maya collective ownership rights include respect for the right to control such lands and resources, including indigenous peoples' right to give or withhold consent to REDD activities that may impact them. The R-PP will need to examine methodology and indicators for securing the consent of indigenous peoples prior to any REDD projects. Unfortunately, the R-PP does not consider indigenous peoples' right of self-determination or representative institutions and decision-making structures. The profile of potentially affected communities, for instance, is to include "a brief history, demographics, geography, and social and economic data," not leadership structures and decision-making processes.

Benefit-sharing. According to international law, the development or commercialization of natural or cultural resources located on indigenous lands requires benefit-sharing. The R-PP should describe how indigenous peoples will share equitably in all the benefits of REDD in Belize, according to their rights either as owners of the land and resources generating carbon emissions or as those doing the work of conserving resources and generating emissions reductions. Design and implementation of benefit-sharing plans should comply with both domestic law and international obligations. Any establishment of "carbon rights" must ensure that indigenous peoples' full ownership rights to their lands and resources are respected. The R-PP, however fails to address benefit-sharing from a rights perspective. Instead, it notes that

³¹ Maya Indigenous Communities of the Toledo District, *supra* note 20, para. 163.

³² U.N. Declaration, *supra* note 7, art. 26.

under the Finance and Audit Act 4(1), any REDD monies derived from the sale of credits by public/state authorities would go to a consolidated fund, unless otherwise legally agreed to and planned for, with no guarantee of benefits to specific communities.³³ The R-PP also notes that national legislation indicates that revenues generated from the use of natural resources by private individuals is both taxable and liable to royalty charges, so that we may expect that carbon credits generated under REDD may be both taxable and subject to royalties.³⁴ The R-PP does not identify how this legislation would be consistent with international law and protect indigenous peoples' land and resource rights.

Consultation. The R-PP does not provide a consultation plan for indigenous peoples, but rather states that it is being developed.³⁵ The R-PP notes that "the Indigenous Mayas of southern Belize are heavily reliant on the land and forests surrounding their communities. Therefore, it is important that they be among the core for participation and consultation, and the applied methodologies should be respectful of cultures and norms, if any degree of success is to be achieved."³⁶ A successful consultation plan, however, will need to specify how it will respect indigenous peoples as owners of their lands and resources, with the right to use, control, develop, and benefit from them. Unfortunately, what evidence can be seen of the R-PP development process is that the Maya peoples have not been adequately consulted. There were no indigenous peoples' organizations on the development team for this version of the R-PP. The two workshops that were held invited selected leaders from the communities and did not invite other indigenous organizations. The R-PP does not lay out a communications strategy and participation forums that are accessible to indigenous peoples.

Participation. It does not appear that indigenous peoples in Belize have a role in REDD decision-making going forward. It is clear there is no indigenous peoples representation on the National Climate Change Committee (NCCC) tasked with decision-making related to REDD. The Technical Expert Group (TEG) established to provide advice to the NCCC, facilitate the creation of the institutional and regulatory conditions to enable REDD compensation mechanisms, and review REDD proposals,³⁷ is described as having one representative from the Belize National Indigenous Council (BENIC) out of 8 total representatives. However, BENIC does not represent Maya communities of Southern Belize.

Missed opportunity to engage in partnership with indigenous peoples

The success of REDD in Belize is dependent on the ability of indigenous peoples to sustainably and securely manage their lands and resources without threat of eviction or encroachment. A national REDD program in Belize can only succeed if it works in partnership with indigenous peoples and provides a framework that ensures respect for indigenous peoples' rights to self-determination and collective ownership of their lands and resources. Much of the forest stocks that still exist in Belize remain intact largely because indigenous peoples have sustainably used and conserved their resources and protected them from destructive activities.

In addition to being a legal and human rights imperative, delimitation, demarcation, titling and registry

³³ Belize R-PP, *supra* note 26, p. 35.

³⁴ *Id.* p. 35.

³⁵ *Id.* p. 25.

³⁶ *Id.* p.21.

³⁷ *Id.* p. 13.

of Maya lands should be identified in the R-PP as a critical strategy for incentivizing indigenous peoples' participation in REDD and securing non-carbon benefits. As set forth in the Ten-point Agreement, "it is in the interest of the GOB and the Maya Leaders to form a partnership for the involvement of the Maya Leaders in the design and implementation of development programmes and other matters affecting the Maya Leaders and their communities."³⁸ Unfortunately, indigenous peoples receive almost no mention among the strategic objectives identified in the R-PP.³⁹ While there is mention of providing resources for engagement of "under-represented social groups," securing indigenous peoples' land and resource rights is not included as a strategy. This misses a great opportunity for REDD.

The R-PP touts Belize's history of community-based forest management and conservation.⁴⁰ However, these arrangements are only sustainable to the extent that they respect the rights of indigenous peoples and local communities. As an example, the Forest Department declares the co-management agreement between the Forest Department and the indigenous organization, SATIIM, null and void as a consequence of the Indigenous Peoples legally challenging the decision of the government of Belize to allow oil drilling on their Maya Customary Lands and inside the Sarstoon Temash National Park, which also form part of Maya customary owned lands. While the R-PP focuses on co-management of protected areas as a strategy for REDD, it ignores the potential for indigenous peoples' ownership and management of their lands and resources as a REDD strategy. Numerous examples exist of indigenous communities managing their communal forest despite opposition from the Forest Department. The R-PP establishes a goal of an 80% increase in co-management of protected areas with "co-managing agencies."⁴¹ The discussion of co-management focuses on national and local governmental organizations, not indigenous peoples. Similarly, while the R-PP uses mapping to analyze conservation outcomes inside and outside of protected areas,⁴² it does not provide an analysis of conservation outcomes *vis-a-vis* customary and recognized indigenous lands.

These are our fundamental concerns, which have led us to write to you as we have learned that the Government of Belize will be submitting its R-PP proposal for consideration in December. We urge you and those responsible for this global initiative to ensure that the international human rights standards affirmed by international law and our domestic court are preserved.

We want to thank you in advance for your time you will give to this important matter. We look forward to hearing from you. We are sending this communication to key parties including the Government of Belize.

³⁸ Ten-Point Agreement between the Government of Belize and the Maya Peoples of Southern Belize, signed by the State and Maya leaders on October 12, 2000.

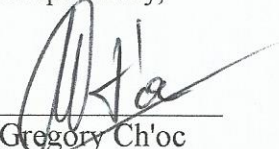
³⁹ Belize R-PP, *supra* note 26, p. 39.

⁴⁰ See e.g. *Id.* p. 14, 17 "The local communities play key management role(s) in the creation and stewardship of many of the established protected areas in Belize and most recently in the management of community lands for sustainable timber production; therefore it is important for continued consultation and participation to take place during the implementation of the R-PP with these critical actors."


⁴¹ *Id.* p. 39.


⁴² *Id.* p. 34.

Respectfully,

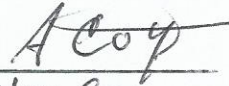

Gregory Ch'oc
SATHIM,
Executive Director

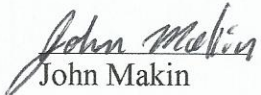

Pablo Ich
Village Council Chairman
Graham Creek Village



Victoriano Cac Pop
1st Alcalde
Graham Creek Village

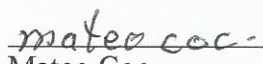

Andres Bo
1st Alcalde
Crique Sarco

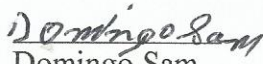

Enrique Makin
Village Council Chairman
Conejo

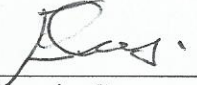

Andres Coy
2nd Alcalde
Crique Sarco


John Makin
2 Alcalde
Conejo


Juan Ico
Village Council Chairman
Midway


Mateo Coc
1 Alcalde
Midway


Domingo Sam
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