



GUYANA FORESTRY COMMISSION

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24th April, 2015.

The Participants Committee

Carbon Fund

Paris Meeting, April 2015

Dear Distinguished Members of the Participants Committee,

The Government of Guyana (GoG) through the Guyana Forestry Commission (GFC) notes with extreme concern and alarm the Amerindian People's Association (APA's) correspondence to the Participants of the Carbon Fund meeting (April 2015: Paris), requesting a rejection of Guyana's submission Early Idea Presentation on the Emission Reductions Programme under the Carbon Fund.

Whilst the GFC is very open to listening to valid concerns by all stakeholders which will contribute to the further advancement of collective efforts on REDD+ Readiness and REDD+ Implementation, GFC asserts that the APA's letter broadly misrepresents the state of REDD+ readiness in Guyana. Rather, it presents a partisan and non-factual position on the state of REDD+ Readiness in Guyana, especially on areas of land tenure, consultations, environmental and social assessments, and feedback mechanism. In the interest of reflecting the accurate position on Guyana's REDD+ readiness, GFC is therefore compelled to present the verifiable facts to the Committee. The global community has acknowledged that Guyana has made significant progress in REDD+ implementation over the past six (6) years.

Currently, the country is implementing a national Strategy for Low Carbon Development, a model platform for land use planning, and management, and a functioning system of social and environmental assessment for projects. Guyana also has in place very current and relevant legislation that allows for residents of Amerindian villages to own their own lands and manage these areas through local decision making structures provided for in the Amerindian Act. Thus, Guyana has empowered our indigenous people with forest governance powers and land tenure security that have effectively made our local indigenous people the second largest land owner in Guyana.

Recent development in REDD+ readiness has seen Guyana develop a state of the art Monitoring Reporting and Verification System that has now been implemented for four (4) annual periods: 2010-2013; these have been independently verified by third party auditors and found to be credible, robust and reflective of international best practice for MRVS. This has enabled Guyana to be one of the first countries to submit a national position on Reference Level for REDD+. Reports on these advances are publicly available and accessible by interested parties on several websites inclusive of: www.forestry.gov.gy

There has also been strong emphasis on transparency in the development of these systems. For example, the development of both phases of the national MRVS was informed by a Roadmap that was developed through a participatory mechanism –a three day process in 2009 for phase 1, and a two (2) day process in

2014 for phase 2. The APA participated actively in both phases. Guyana has also implemented independent forest monitoring following guidance from the Global Witness Hand Book and has now published two annual reports.

Despite these significant achievements, Guyana has outlined several additional areas where progress is still needed- this is reflected in Guyana’s R Package submitted to our multiple delivery partner in October 2014. In this submission we have unambiguously stated the areas which need further development and we identified the main pillars on which those improvements can take place to maximize and take advantage of existing systems and mechanisms (see table below).

GFC, contrary to the APA’s claims, has thus been fully transparent in our account of what has been done, and what remains to be done to date.

It is also a fact that all stakeholders inclusive of the APA have been thoroughly consulted; whilst the other stakeholders, inclusive of the other three (3) indigenous NGO’s are supportive of Government’s engagement with the Carbon Fund, APA for reasons best known internally to the APA, are not.

Component	Sub-component	Overall Achievement
1.Readiness Organization and Consultation	1.a.National REDD+ Management Arrangements	Significant progress
	1.b.Consultation, Participation, and Outreach	Progressing well, further development required
2.REDD+ Strategy Preparation	2.a.Assessment of Land Use, Land Use Change Drivers, Forest Law, Policy and Governance	Significant progress
	2.b.REDD+ Strategy Options	Progressing well, further development required
	2.c.Implementation Framework	Progressing well, further development required
	2.d.Social and Environmental Impacts	Further development required
3.Reference Emissions Level/Reference Level (REL/RL)		Significant progress
4.Monitoring System for Forests and Safeguards	4.a.National Forest Monitoring System	Significant progress
	4.b.Information System for Multiple Benefits, Other Impacts, Governance, and Safeguards	Significant progress

It is therefore a real concern that the APA has chosen to conveniently ignore these glaring facts accepted by all other stakeholders, and plough ahead with unsubstantiated criticisms, many of which are in such obvious contravention to the clear areas of progress in so many aspects of REDD+ readiness.

As one example, the GFC challenges the APA to provide the basis for concluding that “most indigenous communities remain unaware of activities such as the Forest Carbon Sampling or the National Forest Monitoring System”.

Were the APA to consider the 17 communities of the North Rupununi, or the Amerindian village of Kanashen that represents the largest Amerindian village in Guyana, or the 70 Community Forestry Organisations that forms part of the GFC Community Forestry Programme, or Mauritaro - the community where the Opt In mechanism is being piloted after being selected by the NTC, or a long list of other communities; they will be reminded that these Amerindian villages are so advanced in the Forest Carbon

Monitoring System that their methods that have been and are being developed at this level are actually informing and providing a validation system of the national MRVS.

This statement, like several others in APA's letter, simply have no basis and we find the generalization in the use of words such as "most" quite erroneous and tremendously misinformed. Also, it is most unfortunate that the APA seems to be the only group that is opposed to Guyana's engagement in the FCPF and other fora without proposing some alternative opportunity. One is left to wonder whether the organization really has its own interests to serve, or that of another affiliate, or that of the constituency that they claim to represent.

Guyana's Early Idea Presentation of the ER PIN focuses on three main programmatic areas: sustainable mining, forestry and community development which include Amerindian communities. It is a fact that a large majority of Amerindian communities are involved in either forestry or mining activities, or in some cases both. The CF area of community development will impact directly on assisting Amerindian Communities: helping them to directly participate and benefit from the resources of the Carbon Fund by helping to build sustainable capacities and livelihood opportunities to complement the ER Programme. This implies that were Guyana to be successful in securing resources from the Carbon Fund, there will be multiple significant direct benefits to Amerindian villages and communities. Why the APA would see this as a big negative is baffling and again raises concerns about whether the interest of the constituency that they claim to represent is indeed at the heart of the concerns expressed. One has to wonder whether they are really interested in the development of the indigenous peoples' or if there is some ulterior motive by the APA and its international partners to stifle the development of the Guyana indigenous peoples' for the APA's and its partners financial security?

GFC notes that there was specific discussion on key areas of REDD+ readiness in the APA's letter. The APA's presentation of these areas is again not accurate and fails once more to give a true reflection of the status of these REDD+ elements. This is further elaborated below:

Participation and Consultation:

The Multi Stakeholder Steering Committee (MSSC) –the oversight body of Guyana's Low Carbon Development Strategy (LCDS), and other associated arrangements have been established to ensure transparent multi-stakeholder consultations, and enable the participation of all affected and interested stakeholders at all stages of the REDD+/LCDS process. This includes the protection of the rights of indigenous peoples, amongst other indicators. The APA was invited by His Excellency The President of Guyana to be a part of the MSSC chose not to participate.

The LCDS engagements are not intended to replace the REDD+ readiness activities. The Government has expressed its commitment to the development of a Consultation and Participation Plan based on the principle of Free, Prior and Informed Consent (FPIC). This plan is considered as a vital component for the successful implementation of REDD+.

A Communication and Outreach Team was convened as part of the Guyana-Norway Joint Concept Note (JCN) requirements, and the Office of Climate Change (OCC) oversees the coordinating the work of this team. Its responsibilities include:

- Coordinating information flows related to different parts of the LCDS implementation, climate change and REDD+ activities, including LCDS progress, Independent Forest Monitoring (IFM), the Extractive Industry Transparency Initiative (EITI), European Union Forest Law Enforcement, Governance and Trade (EU FLEGT), the FCPF, the Opt-In Mechanism and GRIF Projects such as the Amerindian Land Titling Project.
- Providing guidance and insight to tailored information specifically to meet the needs of community groups, including non-internet based channels of communication such as face-to-face meetings, information packages and traditional media.

Contrary to the APA's statement that "Most indigenous communities remain unaware of activities such as the *Forest Carbon Sampling* or the *National Forest Monitoring System*", the GoG has an ongoing programme of stakeholder outreach on activities on the LCDS and related REDD+ areas. Along with REDD+ areas, the GFC has sought to build capacities in related areas including: LCDS, Guyana's engagement with the EU FLEGT, FCPF, and MRVS for REDD+.

This is evidenced through:

- June to August 2009: 15 sub-national consultations held across Guyana, targeting 222 communities. 3 285 persons attended.
- In 2009, GFC hosted 20 engagement sessions in Regions 1,2,3,4,6,7,8 and 10. 1,043 stakeholders participated. Main area of focus was Guyana's engagement with FCPF and process to be undertaken.
- During 2012, workshops targeted 42 forest communities and associations, and 20 stakeholder sessions were conducted. 124 communities/associations and 50 regional stakeholders totaling 564 individuals participated. Sessions were held in 9 of the 10 Regions of Guyana, namely: Regions 1, 2, 4, 5, 6, 7, 8, 9 and 10.

In 2013, twelve workshop clusters were held in Regions 1, 2, 3, 4, 9 and 10. The focus was on targeted communities, forest associations, miners, non-governmental organizations, government agencies, women and youth groups. A total of 90 communities and associations, 10 NGOs and 12 government agencies, totaling 356 individuals attended these workshops.

Benefit Sharing:

The current structure of the Opt In Mechanism will be explored for its suitability to form the main platform or framework for the benefits sharing mechanism for REDD+ readiness.

Initial work on Benefit Sharing Mechanism was conducted in the development of the Opt In Mechanism (the platform for the benefits sharing mechanism). A revised version of the Opt In mechanism has been prepared as a result.

The main aspects of the benefits sharing system were developed and underwent two rounds of consultation with the main stakeholder groups, specifically the National Tshao's Council (NTC) - the democratically elected representatives of the Indigenous peoples.

Additional options for benefits sharing decision-making are being developed and under review by the OCC for further consideration at the MSSC.

The APA is therefore incorrect in concluding that consultations have not been held on the Opt in mechanism, and by claiming that the extensive discussions at two general assembly of the National Tshaos' Council have thoroughly considered and supported the Opt In mechanism.

GFC reminds the Committee that the NTC is the democratically elected representative of the Amerindian Peoples'.

For the APA therefore to say that the NTC's discussions and decisions on the Opt-in are insufficient, is tantamount to disregarding the role and function of the democratic decision making process of the very indigenous peoples which the APA claim to represent.

Land Tenure Issues:

Guyana is one of the few REDD+ countries that allocates absolute grants and titles to Indigenous villages and has clear provisions for extensions to land areas following a standard process.

Guyana has also conducted transparent analyses of historical land use and trends, as well as of existing land tenure arrangements, status of the titling of Amerindian lands, and challenges.

Additionally, analysis of the main economic activities linked to the forest, and an assessment of national policies and legislation that apply to forest management and their relevance to the implementation of REDD+, have been done.

Further there are clear provisions in the Amerindian Act, as well as Forest Act that specifically speak to customary rights and traditional access and recognizes unhindered access to these areas for subsistence use for all Amerindian people.

Free, Prior and Informed Consent:

Guyana has been stringently applying the main tenets of FPIC in all aspects of the LCDS and REDD+. REDD+ with respect to stakeholders dependent on forest resources; for instance, forest concessionaires, Amerindian and rural communities.

In terms of engagement of Amerindian communities, these will only opt in to any REDD+ agreement through FPIC. Indigenous peoples' representatives are members of main coordinating committees that are involved in various aspects of LCDS and REDD+; specifically, the MSSC, the MRVS Steering Committee and the Communication and Outreach Committee. Through these mechanisms, they have a direct influence on the design and implementation of related activities. The main body through which all coordination is carried out is the NTC. This is the democratically elected body tasked with the responsibility of representing the rights and views of Amerindian communities and villages at the national level.

Under implementation of LCDS projects, direct support is given to communities and villages to build capacity in areas of governance such as in decision making as well as in project execution, financial management and reporting, and project management (Community Development Plans (CDPs)).

6 Key stakeholder groups that have been identified include communities, forest associations, miners, NGOs, government agencies, women, and youth groups.

The GoG has also conducted ongoing stakeholder outreach activities on the LCDS and related REDD+ areas. Along with REDD+ areas, the GFC has sought to build capacities in related areas including, LCDS, Guyana's engagement with the EU FLEGT, FCPF, and MRVS for REDD+. This process continues to be undertaken through a continuous, interactive two way process of outreach programmes, consultations and dialogue, incorporation of ideas and effective dissemination of all relevant information.

In moving forward with the implementation of REDD+ readiness activities as outlined on the R-PP, the GFC will work in collaboration with the OCC and NTC and the four (4) national indigenous NGOs - APA, The Amerindian Action Movement of Guyana (TAAMOG), Guyana Organization of Indigenous People (GOIP), and the National Amerindian Development Foundation (NADF), to conduct stakeholder engagement across the country. Funding for these activities is detailed in the FCPF Readiness Grant.

The Strategic Environmental and Social Assessment (SESA)

Relevant studies and diagnostics, and consultation processes will be undertaken with the FCPF Readiness Grant. Already, through an IDB funded project, the existing institutional framework and legislation were analysed in consultation with key parties.

Whilst the SESA has not yet been undertaken (and the R Package is clear on this), there are significant advances in Environmental and Social Impact Assessment (ESIA) areas from a legislative, operational and procedural standpoint.

The main legislation governing environmental management in Guyana, is the Environmental Protection Act (1996), and the accompanying Environmental and Social Impact Assessment (ESIA) Regulations and requirements. The Environmental Protection Agency (EPA) has the main mandate to implement this legislation and its primary goal is to manage environmental and social risks and impacts, of all sectoral activities.

The planned study of the results of the environmental and social impacts should be used for prioritizing REDD+ strategy options and its design. The GFC has clearly outlined in its Early Idea Presentation that were the ER PIN to move forward, this is a priority area for advancement.

Feedback and Grievance Mechanism

Several multi-stakeholder processes currently provide the platform to address grievances. Guyana has at present a number of operational mechanisms in place through which stakeholders can provide feedback and seek redress in relation to REDD+ implementation, including:

- The Amerindian Act, 2006, which provides for redress on governance areas for Amerindian villages and communities.
- The Ministry of Natural Resources and the Environment (MNRE) and its natural resources management agencies have dedicated resources for feedback and redress across each natural resource sector thereby providing specialized resources for this purpose.

- The Ministry of Amerindian Affairs (MoAA) through its Community Officers provides a decentralized framework for the disseminating of information and the receiving of feedback, and subsequent addressing of grievances where these may arise.
- The MSSC and feedback by members from their respective constituents, which include indigenous communities, youth, women, labour, private sector among other key stakeholder groupings.

In closing, GFC emphasizes that our current understanding of the engagement of various countries in the Carbon Fund process, is that not all readiness needs to be completed prior to the moving ahead with the ER PIN, once that is technically sound.

It is also our understanding that engagement in the Carbon Fund, contrary to the APA's position, will incentivise, encourage and further advance country progress in key REDD+ readiness areas such as SESA.

Our assessment should therefore be equivalent to that of other countries in terms of what is needed to be completed prior to engagement in the Fund, and what is required to show commencement and advancement where these may apply.

Guyana firmly believes that engagement in the Carbon Fund will provide a good opportunity to impact positively in the global Emissions Reductions programme in support of REDD+ and at the same time, provide a successful example on how national and community level ER programmes can bring about positive impacts for a High Forest Cover Low Deforestation Rate country.

GFC remains committed to working collaboratively and constructively with all stakeholders to continue advancing on this.

With Best Regards

GUYANA FORESTRY COMMISSION

A handwritten signature in blue ink, appearing to read 'James Singh', is written over a horizontal dotted line.

James Singh

Commissioner of Forests