
Submission to Participant's Committee of the World Bank Forest Carbon Partnership Facility on:

Recommendations from Thailand's Civil Society Organizations¹ for the Revision of the REDD+ Readiness Preparation Proposal (R-PP) for Thailand²

Submitted on 15 March 2013

By the Civil Society Working Group on Monitoring the REDD+ Readiness Preparation Proposal (R-PP) in Thailand

With respect to the Department of National Parks, Wildlife, and Plant Conservation (DNP) upcoming submission of the Thailand REDD+ Readiness Preparation Proposal (R-PP) to the Forest Carbon Partnership Facility (FCPF) of the World Bank, which will be considered at the 14th Participants Committee (PC) Meeting held on March 19-22 2013 in Washington D.C., the Civil Society Organizations and indigenous peoples³ of Thailand would like to express our concern.

Sharing a common interest in closely monitoring and following up on the R-PP development process, the civil society organizations and indigenous peoples of Thailand assembled in a consultation workshop, with the intent to review the R-PP and formulate these proposed recommendations. A number of fundamental issues with the R-PP have been articulated through this consultation process, namely the contents of the national R-PP, its proposed operational plan, and the process itself for which the R-PP was developed.

We would like to express our intention to participate in the development and revision of the R-PP contents in order to foster equality and governance in forest conservation. While forests play an important role in mitigating climate change on behalf of the international community, attention must be given to the critical role of forest to local and indigenous communities, who consider forests to be a source of food, shelter, and their cultural inheritance. The following recommendations are grounded within the fundamental rights guaranteed in the Constitution of the Kingdom of Thailand B.E. 2550 (2007), the rights of indigenous peoples as stipulated in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), the safeguard policy on indigenous peoples of The World Bank, and the Cancun Agreement of the United Nations Framework Convention on Climate Change (UNFCCC); all of which are also referenced in the R-PP.

The R-PP analysis of the issues at hand is far from comprehensive, due to the fact that the civil society sector, general public and direct forest stakeholders were not given sufficient opportunities to genuinely participate in the drafting process. This is exemplified in the R-PP's failure to address historic problems of centralized forest governance, and overall disregard of community rights to resource management. These are structural challenges that have continually elicited conflict

¹ List of Civil Society Organizations provided on page 4.

² The recommendations given in this document were developed during the consultation workshop entitled. "Promotion of Equity in Reducing Emissions from Deforestation and Forest Degradation+ (REDD+): Perspectives of Civil Society in Thailand" on the 6th of March 2013 at Centre Point (Langsuan), Bangkok, Thailand, organized by RECOFTC - The Center for People and Forests with support from Grassroots Equity and Enhanced Networks in the Mekong (GREEN Mekong) and Lowering Emissions in Asia's Forests (LEAF). RECOFTC assumed the role of facilitator and organizer and should not be considered a participant. Therefore, the views expressed and information contained in this document are not necessarily those of or endorsed by RECOFTC, GREEN Mekong, or LEAF, which can accept no responsibility for such views or information or for any reliance placed on them.

³ Due to the contested nature of defining "indigenous peoples" in Thailand, in this document, we have followed the request of the Working Group members and used indigenous as a general term that includes ethnic minorities."

between the State and local communities. The strategies, activities, and management frameworks formulated in the R-PP give primary structural and authoritative agency to the DNP, excluding genuine public participation, namely from indigenous peoples and those communities that may be most directly impacted by R-PP implementation.

Although the official R-PP document has already been submitted to the PC of the FCPF, the civil society sector is still determined to propose these recommendations, developed from a consultation workshop in Bangkok, Thailand on the 6th of March 2013⁴. Detailed suggestions pertaining to specific R-PP components may be found in Annex 1 “Proceedings of the Workshop.” For the consideration of the PC, DNP and other relevant stakeholders, the key recommendations have been summarized as follows.

1. The Civil Society Organizations affirm the right to participate actively in each process and procedure as stipulated in the pertaining laws and international obligations. The government, herein the DNP, has the responsibility to ensure the process is accessible to people from all sectors without any reservations.
2. The contents of the R-PP must be re-developed and amended to ensure that it is: acceptable to all relevant parties, accurate and compatible with current social realities within the national context of Thailand, and clearly determined to solve the problems that may arise from REDD+ activities.
3. The principles of Free, Prior, and Informed Consent (FPIC) guaranteed in UNDRIP, Constitution B.E. 2550 (2007), and the Prime Minister Office’s Regulation on Public Consultation B.E. 2548 (2005) must be incorporated in the R-PP.
4. The organizational arrangement of REDD+ in Thailand under Component 1 must be restructured accordingly:
 - 4.1. The composition of the REDD+ Task Force and various committees during the preparedness and implementation phases as outlined in Table 1a-1 and 1a-2 must consist of diverse representatives from civil society sector including:
 - 4.1.1. Women and youth
 - 4.1.2. Local people within pilot sites, and indigenous community representatives if present
 - 4.1.3. Local administrative organizations in and around pilot sites
 - 4.1.4. Non-governmental organizations operating in and around the pilot sites.
 - 4.2. Any organizational decisions in Component 1 must be achieved through consensus.
 - 4.3. The REDD+ institutional arrangements must be established as a public organization, detached from the centralized structure of DNP.
 - 4.4. The REDD+ Task Force Secretariat and REDD+ offices must be completely separated from the DNP and report directly to the REDD+ Task Force.
 - 4.5. Those laws that address decentralization of power and enhance the role of local administrative organizations must be adhered to, including the Constitution B.E. 2550, the Determining Plans and Process of Decentralization to Local Government Organization Act B.E. 2542, (1999) and Tambon Council and Administrative Organization Act B.E. 2537 (1994).
 - 4.6. A civil society-based REDD+ Coordination Center must be formed and built into the institutional structure for both the REDD+ preparation and implementation phases. This would replace the REDD+ Local Offices and local forest-dependent communities/ethnic groups as shown in Figure 1a-2 and 1a-3. This Center must maintain the equal authority with the REDD+ Information Center, REDD+ Office and Regional REDD+ Coordination Unit.

⁴ The workshop was entitled “Promotion of Equity in Reducing Emissions from Deforestation and Forest Degradation+ (REDD+): Perspectives of Civil Society in Thailand,” and was organized by RECOFTC - the Center for People and Forests with support from Grassroots Equity and Enhanced Networks in the Mekong (GREEN Mekong) and Lowering Emissions in Asia’s Forests (LEAF).

5. The process of consultation with local people under Component 1 should include diverse perspectives and refrain from delivering one-sided information. The process should be simple and accessible to all people in the areas. Communities should be ensured proper consultation processes and freedom to exchange. These should be compatible with FPIC processes. The consultation process must include diverse representation from various community members impacted by REDD+, including women, youth, indigenous peoples, religious leaders, and other respected community leaders. Recorded information of the consultation must respect different opinions, reflecting them equally in the reporting without bias.

The act of restricting information must be prohibited. Local people should be encouraged to exercise their rights guaranteed in the Official Information Act B.E. 2540 (1997), which supports freedom to access data and sources of information.

6. The consultation and public participation process should engage independent and neutral agencies to facilitate in every process.
7. Evaluations of the social and environmental context for REDD+ must specifically examine land use, drivers of land use change, in addition to prevailing forestry laws, policies and management. The present assessment in the R-PP has not generated strategically appropriate REDD+ options, and is incompatible with on-the-ground realities in Thailand. The civil society sector, especially indigenous peoples, is weary that REDD+ may threaten and infringe upon statutory and customary rights.

Therefore, a comprehensive re-assessment of the context for REDD+ implementation should be conducted in order to address present conflicts and prevent future rights encroachments over those entitled to forest conservation and use. If such violations are unavoidable under a REDD+ scheme, solid measures of redress and compensation must be developed with the consent of rights holders. However, such measures cannot be used as an excuse for REDD+ implementation without formal agreement from local stakeholders. Any laws, regulations, and Cabinet resolutions that guarantee, protect, and promote the rights and livelihoods of indigenous people must be incorporated into the revised assessment.

8. The civil society sector, particularly women and indigenous people, must be included in all decision-making processes, including the management structure, REDD+ fund, benefit sharing mechanism, monitoring and evaluation, and other activities in REDD+ implementation as in Component 2c and Component 4.
9. Activities focusing on gender issues should be organized. In addition REDD+ funds targeting women should be established at all levels.
10. An independent REDD+ information center should be established.
11. Solid mechanisms and measures should be clarified regarding redress and compensation procedures for those impacted by REDD+ activities.
12. A solid operational plan for capacity building for community-based organizations in REDD+ areas should be formulated.
13. Social and Environmental Strategic Assessments (SESA) should prioritize FPIC as stated in UNDRIP, in addition to the World Bank's safeguard policy. The Assessment team must include experts on gender.
14. Any new terminology for REDD+ should be developed in consultation with all parties to seek mutual agreement. Controversial terminologies, such as "forest-dependent communities" must be avoided as they elicit negative connotations to society at large.

15. The definition of key words in REDD+ should be agreed upon through consensus by all parties. For instance, in defining “forest,” definitions in forestry laws should be considered alongside other sources such as customary definitions and cultural understandings.
16. Guarantees must be made that the Design Systems for National Forest Monitoring and Information on Safeguards in Component 4 and the Design of a Program Monitoring and Evaluation Framework in Component 6, as well as other activities in REDD+ will not lead to community displacement or involuntary expulsion from related areas. The design of indicators, assumptions, and risks of REDD+ must not restrict the rights of livelihood-related activities and traditional practices of indigenous peoples.
 - 16.1. Controversial indicators listed in Table 6-1 should be removed, such as:
 - 16.1.1. “Report with number of families ceasing shifting cultivation and CO₂ emissions avoided”
 - 16.1.2. “Report confirming communities involved have adopted alternative systems”
 - 16.1.3. “Annual Report on evaluation of change in income and food security”
 - 16.1.4. “Community reports on changes in forest carbon stocks”
 - 16.2. Controversial assumptions and risks listed in Table 6-2 should be removed, including, “Local forest-dependent communities fail to agree to adapt agricultural practices.”
17. The government must acknowledge existing communities who own their forestlands and respect their tenure holdings and customary use rights to forest resources. Laws that cause conflicts between the communities and the national parks must be reformed. In addition, the Government must reform laws that currently obstruct forestation if they are to put in place other incentive measures such as awards or funds that encourage local people to plant more trees.

These proposed recommendations must not override those presented by other civil society organizations (if any), in order to support a REDD+ development process that lies in accordance with the principle of participation under FPIC, the respect of human dignity, good governance, gender equality, and overall equity.

Proposed on 15 March 2013

By
 Eastern Community Forest Network
 Indigenous People Foundation for education and environment (I.P.F.)
 Inter Mountain Peoples Education and Culture in Thailand Association –IMPECT
 Karen Network for Culture and Environment (KNCE)
 Hmong Association
 Indigenous Knowledge and Peoples
 Wisdom of Ethnic Foundation
 Rabbit in the Moon Foundation
 Yadfon foundation

Annex 1: Proceedings of the Workshop

Proceedings of the Workshop on “Promotion of Equity in Reducing Emissions from Deforestation and Forest Degradation+ (REDD+): Perspectives of Civil Society in Thailand”

Organized by RECOFTC - the Center for People and Forests with support from Grassroots
Equity and Enhanced Networks in the Mekong (GREEN Mekong) and Lowering Emissions
in Asia’s Forests (LEAF)

6 March 2013
Centre Point (Langsuan) Hotel, Bangkok

I. Background and objectives

The 1992 Earth Summit in Brazil brought the issue of climate change to the forefront of international discussions, and led to the birth of the United Nations Framework Convention on Climate Change (UNFCCC). Thailand ratified and thus became a UNFCCC member in 2002. In the 11th Conference of the Parties (COP 11), the Reducing Emission from Deforestation mechanism was proposed, which later evolved into what is currently known as REDD+. In 2010, Thailand developed and submitted the R-PIN (Readiness-Project Idea Notes) to the Forest Carbon Partnership Facility (FCPF) of the World Bank. Budget was granted to further develop the Readiness Preparation Proposal (R-PP) in 2012-2013. Thailand’s Department of National Parks, Wildlife, and Plant Conservation (DNP) hired an advisory team to draft the R-PP. In total, eight regional and national consultations were held.

The latest R-PP draft version dated 24 February 2013 has been sent to the Participants Committee (PC) Technical Advisory Panel (TAP). In order to bring the dimension of equity to the forefront of analysis, information exchange and recommendations, the Civil Society Sector organized this consultation workshop under the co-operation and support of RECOFTC, GREEN Mekong and LEAF. The focus of this workshop was to review both the R-PP process and its contents, focusing on each component in relation to social equity (see below).

Key concerns and suggestions were raised regarding the process of consultation:

- 1) Due to the short time frame of a one-day consultation and the complexity of the issues at hand, the outcome recommendations could not be comprehensive.
- 2) To develop such comprehensive recommendations, there must be continual follow up on progress and process of exchange after the end of this workshop. Long-term advocacy must be pursued for stakeholders’ right to access information and exchange opinions.
- 3) A focal point organization or coordination center should be designated to consolidate database and communicate information to relevant stakeholders and local communities.

II. Key Contents of R-PP pertaining to Social Equity

As was determined in the COP 16 Cancun negotiations, REDD+ implementation is divided into 3 phases. Phase 1 covers readiness preparation, with the National REDD+ Strategic Plan Development as the frame of all other activities, and the R-Package as the final output. Phase 2 covers implementation and Phase 3 addresses funding. At present, 37 countries have submitted proposals to the World Bank. To date, nine countries are being supported with requested funding for R-PP implementation. For Thailand, the official R-PP assessment will begin in March 2013. The contents of the R-PP template under the FCPF consist of six key components:

- 1) Organize and Consult
- 2) Prepare REDD+ Strategy
- 3) Develop a National Forest Reference Emission Level and/or a Forest Reference Level
- 4) Design Systems for National Forest Monitoring and Information on Safeguards
- 5) Schedule and Budget
- 6) Design a Program Monitoring and Evaluation Framework.

The participants' preliminary observations on the R-PP were:

- Although the consultation and implementation of FPIC during R-PP drafting process had been attempted, the period allotted for such was too brief and information sharing was insufficient.
- The R-PP discusses issues of governance and social equity to a certain extent, however the REDD+ institutional arrangement put forward is centralized and state-based, which calls into question issues of participation within decision-making processes.
- The R-PP addresses legal reform and revision of existing legislation while proposing policies for REDD+. However, no clarification is made on how steps will be taken during readiness preparation to address legal and policy reforms needed in order to be compatible with REDD+.
- Benefit sharing mechanisms, both in monetary and non-monetary forms, are not made clear. A model of Payment for Ecosystem Services (PES) is proposed but no further elaboration is made on how it would function within the context of Thailand.
- The use of the term "forest-dependent communities" in referring to diverse stakeholder communities is ambiguous and contentious. There are diverse stakeholders located inside forests, forest corridors, buffer zones, and distant communities who maintain distinguished livelihoods, relationships and dependencies with forests.

The analysis on social equity in REDD+ and R-PP during this Workshop focused on six key issues, namely: 1) consultation and the principle of Free, Prior, and Informed Consent (FPIC), 2) governance and social justice in policies and laws, 3) tenure rights, 4) benefit sharing, 5) gender and marginalized groups, and 6) active participation of ethnic and indigenous groups. The summary is elaborated below.

1. Consultation and the Principle of FPIC (Component 1: 1b and 1c)

A proper and transparent stakeholder analysis is necessary for consultation and FPIC in order for related parties to engage meaningfully in the process and the delegation of roles, responsibilities, and restrictions of facilitators and implementing agencies.

Observations

- The R-PP states that a Task Force Committee will be established with the participation of many sectors. However, there is concern regarding the degree of meaningful participation and genuine acceptance of diverse communities.
- It is stated that FPIC will only be implemented in pilot sites, however the site selection process is not yet clear.
- The extent of participation by the organizations listed in R-PP is questionable.
- The mechanisms of participation are still embedded within the State's administrative apparatus.

Recommendations

- The right to select and receive information must go beyond consultation with local administrations to also address villagers and user groups. Clarifications must be made on which communities will participate and be recognized under REDD+.
- Principles of FPIC must be applied beyond the selection of pilot sites, and should be incorporated into the development of a national strategy and administration of public consultations. Relevant information must be made accessible and understandable to all stakeholders. In addition, adequate time must be allocated for information dissemination, awareness raising and capacity building on REDD+.
- An information center must be developed independently from government, especially the Protected Area Offices.
- The institutional arrangements must include local administration organizations, independent agencies, academics, and CSOs drawing on their existing capacities and understandings of the issues.
- Target groups in FPIC must include religious leaders, informal leaders, women, youth, and indigenous peoples.
- The content of the consultation must address community rights to forest management, the need for legal reform, customary land use rights, and community participation in consensus-based decision-making.

2. Governance and Social Justice in Policies and Laws (Component 1 and 2: 1a, 2a, 2b and 2c)

This section analyzes the decision-making structure with regards to delegation of authority, monitoring, transparency, laws and policies.

Component 1

Observations

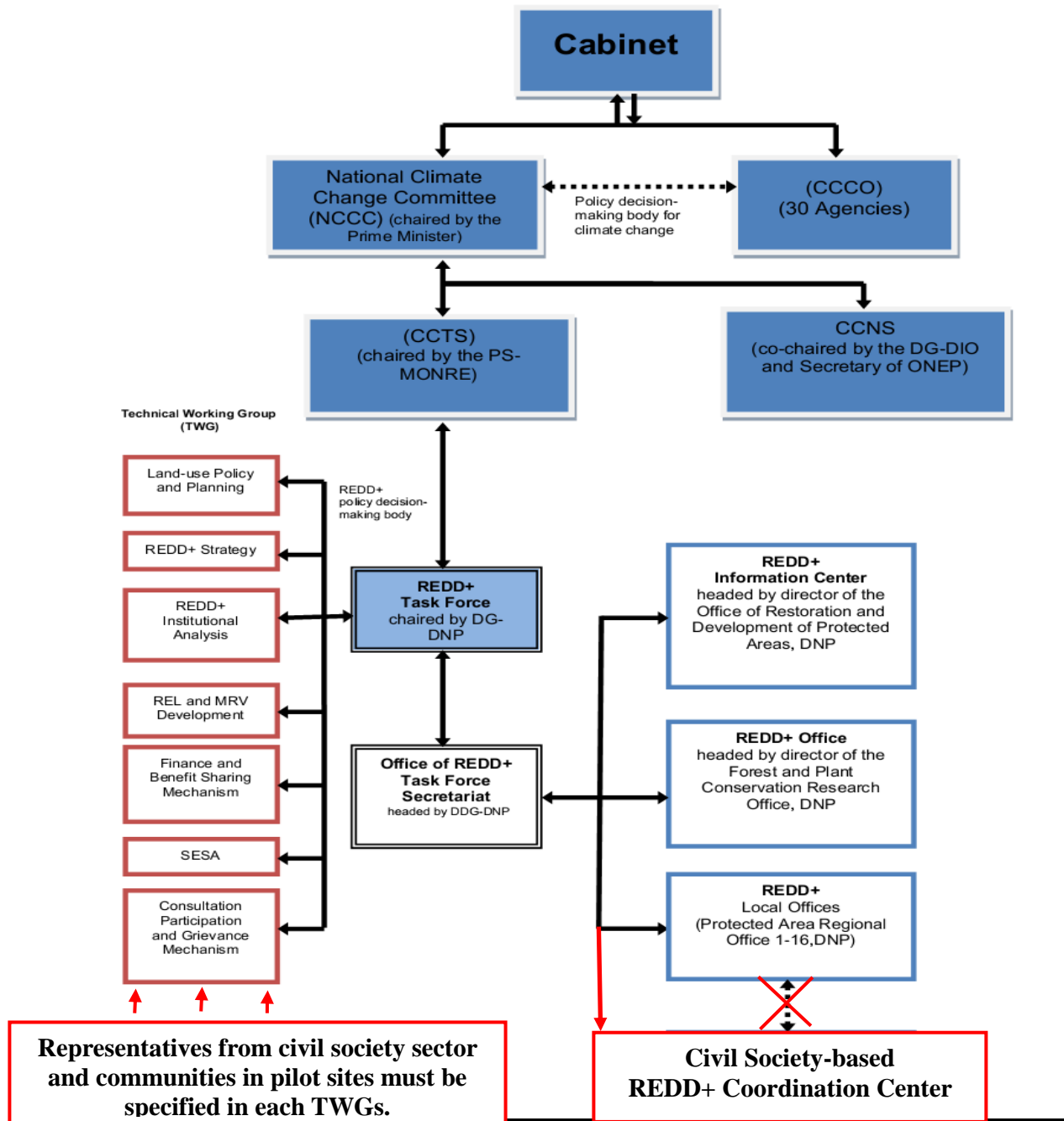
- The ratio of the civil society sector within the Task Force Committee management structure is inadequate. The functions and roles the organizations listed in R-PP are unclear and it is uncertain whether they will be invited to committees. There is no mention of representatives from communities from pilot sites.
- The existing structural mechanisms have not fostered social equality as they mainly authorize decisions using existing legal instruments that do not sufficiently promote community rights.

Recommendations

- Operations at the local level must officially include forest communities into REDD+ Task Force Committee by allocating a representative quota from the civil society sector (those with potential impacts from REDD+ activities, especially in the pilot sites). A quota must also be established for civil society sector representation in different Technical Working Groups (see Figure 1a-2 below).

- The civil society-based REDD+ Coordination Center must be established with equal authority as other agencies under the Office of REDD+ Task Force Secretariat (see Figure 1a-2 below)
- The decision-making process of the REDD+ Task Force Committee must be based on consensus (not voting).

Figure 1a-2 Institutional arrangement for REDD+ readiness



Component 2

Observations

- The R-PP is framed under constitutional laws and eight additional environmental laws, which do not articulate community rights in forest management and practices. Although “community rights” are articulated in the constitution, other

organic laws do not support community rights. This leads to discrepancies at the operational level.

Recommendations

- In constructing the REDD+ mechanism, other legal frameworks should be consulted, such as the cabinet resolutions on Sea Gypsies and Karen livelihoods restoration (June and August 2010 respectively). This process should look to promote participation and good governance in forest management by the indigenous peoples whose daily livelihoods and production systems greatly depend on nature.
- Other relevant and beneficial international laws must be referenced. The Thai government has signed and ratified these international laws such as the CBD, CERD, UNDRIP, RAMSAR, UDHR, etc.
- REDD+ mechanisms should be seen as an opportunity for development and legal reforms on the basis of human rights, good governance, equality, and international obligation. The REDD+ process should facilitate the reform and consolidation of forestry laws to be compatible with current situations. Collaboration should take place between REDD+ authorities, the Law Reform Commission of Thailand (LRCT), Civil Society sector and academic institutions.

3. Tenure Rights (Component 2: 2b, 2c and 2d)

While REDD+ focuses on the forestry sector, there is also a critical connection with other sectors such as agriculture. Hence land-use and landscape planning must be included in REDD+ pilot site development. During REDD+ readiness and implementation, which includes the development of supporting measures, mechanisms and policies, the priority must remain with the acknowledgement of tenure rights and fair distribution of land.

Observations

- Without clarity on tenure rights, conflicts in REDD+ implementation are to be expected. There are many current problems associated with lands located in protected forests. Communities that settled on forests lands prior to the designation of protected area status still lack proper measures or mechanisms to protect tenure rights. Many initiatives such as the Joint Management of Protected Area (JoMPA) and community title deeds have been developed, but the Government has not provided any official response on the issue.

Recommendations

- REDD+ must acknowledge the tenure rights of communities living within protected areas. Land security provides the basic right to livelihoods, ensures food security and builds resilience in the face of climate change impacts.
- The demarcation of forests must identify the livelihoods zone, use zone, and conservation zone. Demarcation itself may function as both the long-term strategy and implementation tool of land management. The demarcation process should be carried out using participatory land use planning techniques.
- The rights to use forest resources for livelihoods, including customary rights to food security and access to resources, must be protected under REDD+.

4. Benefit sharing (Component 2: 2c)

REDD+ benefits in the readiness preparation phase are still unclear in terms of structure and specific sharing mechanisms. The conceptual design and structural development of benefit sharing mechanisms must be a critical element of the preparation phase. Several issues must be

clarified from the outset, such as the definition of forest, tenure rights, stakeholders, affected parties, incentive structure for forest conservation, as well as the decision-making process. In addition, analyses must focus on the decision-making authorities in the benefit sharing structure identified in the REDD+ implementation framework.

Observations

- If well designed, REDD+ will enhance the recognition of community rights, reduce conflicts in the communities, and provide opportunities for improving policy.
- If well designed, REDD+ will improve the forest data management and organization while enhancing capacities of relevant parties.
- REDD+ benefit sharing as indicated in the R-PP is based on a Payment for Environmental Services (PES) model, and would channel international funds to local communities through the government administration. The government plays the central role in managing the REDD+ funds.
- Discussions surrounding REDD+ funds, and the role and authority of the National REDD+ Fund Management Committee, are vague.
- There remains ambiguity regarding issues of equity in benefit sharing. Multiple definitions of terms like “forest”, “rights” and “forest resource ownership” must be clarified, and in particular, the State’s definition and customary rights that communities refer to.
- The definition and use of the term “forest-dependent communities” does not accurately reflect reality in Thailand. Communities have not only taken benefits from the forest but also work to protect and conserve the forests. The term must be replaced.

Recommendations

- Communities that closely protect the forest must receive direct benefits based on the principles of good governance and community rights. Opportunity costs must be considered.
- The REDD+ Fund should be managed through the Office of REDD+ Task Force Secretariat in which the Civil Society-based REDD+ Coordination Center is represented as shown in Figure 2c-1.
- The objectives of REDD+ fund should be:
 - To promote and support natural resource management and biodiversity.
 - To provide compensation for opportunity costs associated with shifts from customary livelihoods practices.
 - To support community welfare and cover the operational costs of making and participating in the Civil Society-based Coordination Center.
 - To enhance the capacities of relevant stakeholders in both government agencies and local communities.
 - To support participatory REDD+-related research.

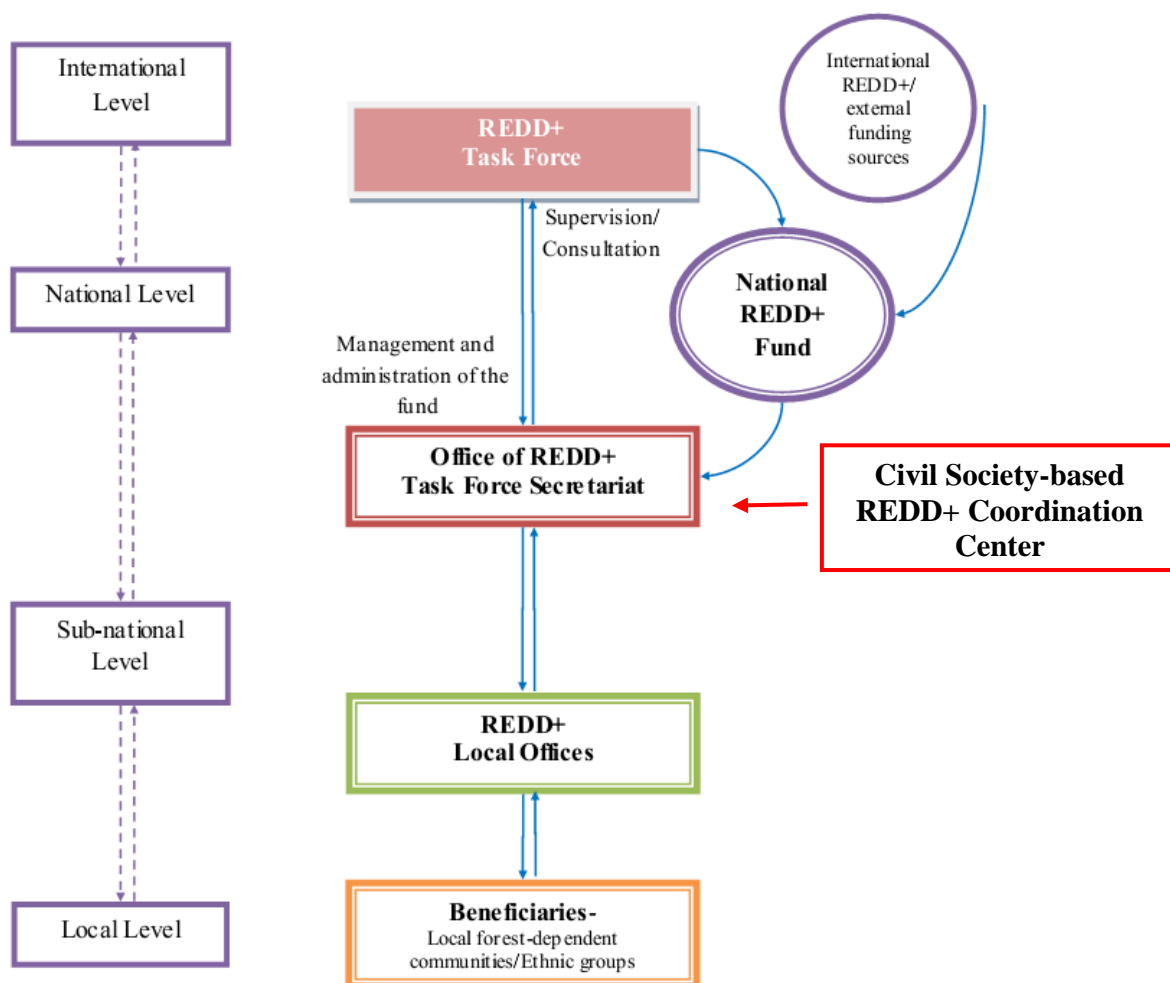


Figure 2c-1: Financial arrangements for REDD+ implementation.

5. Gender and marginalized groups (Component 2)

Gender roles in forest management are very important for forest-based local communities. This is especially true for female members of the community who often have the responsibility of collecting forest products for household consumption. Gender must be considered at all stages of the REDD+ development process. Additionally, poor and marginalized groups who depend highly on forests for their survival should be included in the participation process to determine what constitutes as fair and equitable benefit sharing.

Observations

- A gender-sensitive dimension in the R-PP is lacking.

Recommendations

- The Social and Environmental Strategic Assessment (SESA) team must include gender experts and a significant proportion of female representatives. A study on gender issues in forest resource management must be conducted in the pilot sites. This can be included within SESA studies regarding the impacts of REDD+ on gender roles.
- FPIC must pay particular attention to targeting women.
- The rights of women to use and manage resources must be protected in REDD+.
- Women must be encouraged to participate in all processes including REDD+ project

design, benefit sharing, and capacity building. Initiatives should promote the participation of women in forest resource use and management. This must be clearly indicated in the REDD+ strategy and TORs of the REDD+ Task Force Committee.

- The REDD+ Task Force Committee must have representation by gender-related organizations, such as the Indigenous Women Network.
- Raising awareness activities on gender issues should be administered for authorities and relevant REDD+ decision makers.

6. Active participation of indigenous peoples (Component 1: 1b and 1c)

There must be increased recognition of social equity issues surrounding indigenous peoples. Over the past few decades, indigenous peoples have not been sufficiently acknowledged for their important roles in forest resource management in Thailand. Furthermore, indigenous peoples are often those most directly impacted by government policies and projects.

Recommendations

- The fundamental rights of indigenous peoples (nationality/substantive rights) must be recognized. The process for establishing nationality must be seriously and transparently conducted.
- The conflicts between the DNP and the indigenous peoples, such as forest and climate change related cases in both Civil and Criminal Courts, must be reduced. The arrests and imprisonments must cease to continue for community members who have lived on lands prior to protected areas designation and who rely on forests for livelihoods.
- SESA procedures must include traditional systems of knowledge surrounding natural resource management. SESAs should encourage the thorough study and evaluation on the carbon balance within traditional production systems such as in swidden cultivation.
- Indigenous peoples must be engaged at all levels of decision-making on the issues that pertain to them, especially at the policy level.

III. Key Challenges that will Contribute Either to the Success or Failure of REDD+

Emerging from this analysis are four especially critical issues that will either contribute to the success or failure of REDD+ in Thailand.

- 1) Unclear and disputed multi-stakeholder definitions of “forest”, “forest ownership” and “communities” (such as “forest-dependent communities”) must be redefined through consensus, including CSOs and local people.
- 2) If REDD+ is implemented under existing laws and policies, it has a high risk of failure. During the preparation and implementation phases, significant legal and policy reforms will be required.
- 3) The “participatory” process currently lacks active and meaningful decision-making authority by the civil society sector. This must be addressed.
- 4) The ambiguity on the authority and the role of REDD+ Task Force committee must be addressed.

IV. Action plan

- 1) Submission of recommendations to the DNP for further R-PP revision. However, it needs to be stressed that the act of submitting recommendations does give the DNP authority to render the listed participants and organizations as “approving” its official R-PP, regardless of whether the DNP amends the document in accordance with the recommended revision.
- 2) Submission of recommendations to the partner organizations in the Participants Committee (PC) meeting of the Forest Carbon Partnership Facility (FCPF), World Bank.
- 3) Communication of our findings to the media and wider public.