

## **Comments of Vietnam CSOs/NGOs to Vietnam REDD+ RPP and policies**

Presented at the Workshop: Sharing lessons on REDD+ Governance in Lam Dong Province from March 21-22, 2011 by Nguyen Xuan Vinh - Department of Ecology, Institute of Tropical Biology (DoE/ITB)

### **Foreword:**

Among the top priorities of Vietnam government are poverty reduction and environmental protection. However, due to vagueness, complexity and potential risks of REDD+ mechanisms, Vietnam's REDD+ strategy should focus on the two ultimate highest objectives:

1. Increase the living standards and uphold the rights of indigenous peoples who have been traditionally dependent on their forest. **Ethnic minorities are key stakeholders in sustainable forest management and must be regarded as the first and highest beneficiaries of REDD+ mechanisms.**<sup>1</sup>
2. Conserve biodiversity and protect forests, **especially the existing natural forests.**

### **Commenting process:**

- BIC and GGF supported **ITB to conduct an initial review of Vietnam REDD PIN and RPP.**
- Consultation meeting in Hanoi on Jan 10, 2011 with participation of ITB, SRD, CSDM, PanNature, CERDA.
- Consultation meeting in HCMC on Mar 2, 2011 with participation of ITB, FORWET, Nong Lam University, FSSIV, WAR, Southern region Institute for Sustainable Development (SISD), SNV and experts.
- Comments via email from RECO, **Center for Environment Resources and Rural Poverty Alleviation (CERPA)**, HaDevA.

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<sup>1</sup> Vietnam government is signatory to the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), which sets out key principles such as the implementation of free, prior and informed consent (FPIC), community ownership of traditional land, and recognition of equitable benefit-sharing.

## Overall understanding on REDD+ and implementing mechanisms at present:

- Carbon sequestration is just one of the services of forest ecosystems; there are other equally, if not more, important services that forest provides including maintaining the identity of ethnic minorities, preservation and improvement of indigenous knowledge system in biodiversity protection, soil protection, water regulation, landscape beauty, medicinal value, and provision of clean and healthy living environment.
- Current REDD+ concept and practices are still vague, complicated and many issues need to be continued to discuss, debated, elaborated and tested. These include: equity in benefit sharing, role of forest-based payment for ecological system, addressing drivers of deforestation and degradation, role of communities in carbon monitoring, the application FPIC, addressing land tenure issues, and safeguards.
- Clear policies and standards for Certified Emission Reduction (CERs) from forest are needed.
- **Payment or award from REDD+ performance alone is not enough to protect natural forests from further deforestation and degradation for the sake of short-term development opportunities and benefits. Addressing drivers of forest loss is key.** REDD+ should be integrated with other alternative livelihoods and comprehensive land use management and socio-economic development plan.
- As REDD+ creates investment opportunities for forest plantations to enhance carbon stock, there are risks that it can **undermine biodiversity (such as loss of natural forest, grass land) and traditional livelihoods of the poor and ethnic minorities who traditionally depend on natural forests, especially when there is still clarity needed in policies or laws regarding the rights and access of ethnic minorities on their forest.**

## Overall comments on Vietnam RPP:

- It's a big, thick and beautifully written document in English, developed by international consultants with some consultations. It has mentioned and discussed related and important issues (e.g. FPIC, safeguard standards,

SESA, carbon leakage, etc.) in preparing the readiness and development of national REDD+ program.

- **However, a major weakness of the RPP development is the failure to provide a Vietnamese version of full RPP – until now. Hence, it has limited a broad, meaningful and effective consultation with forest stakeholders at the national and local levels, including those interested local institutions that been engaged in monitoring and exploring REDD+ activities.**
- In the RPP, it is hard to see linkages among components, issues, activities, and binding principles to successfully implement the readiness phase of REDD+. In short, it isolates REDD+ from other sectoral issues and opportunities.
- It is for the above reasons, the recent emergence and complex nature of the REDD+ and absence of translation in local dialects that inspired us, civil society organizations in Vietnam, to collectively review the RPP.

**Below are our specific comments and recommendations:**

**Box 1: Comments to drivers of deforestation and forest degradation**

RPP should include the following as causes of deforestation and forest degradation:

- **Unsustainable ecotourism development; although it is mentioned, there needs be further emphasis on the deforestation impacts of **infrastructure development**, including hydropower and mining-related investments.**
- **Unsustainable logging by local communities.** This is due to the failure of buffer zone development programs, which do not provide adequate alternative livelihood programs for forest dependent communities. Local people, especially indigenous people, are not provided with enough support once they are resettled in the buffer zones, which result to unsustainable logging and timber cutting.
- **It does not provide clear measures to shift the current reforestation**

programs of the government. Until now, the reforestation programs are mainly dedicated to commercial plantation and pay little attention to reforestation using indigenous and endemic tree species. Current supply to demand of good quality timber mainly comes from natural forests.

**Box 2: Equally significant concerns**

***There are risks that REDD+ can undermine the livelihoods of ethnic minorities and other forest dependent communities if it is pursued in isolation from the larger issues of forest governance.*** In particular, the policies on the rights and access of ethnic minorities to their forest resources (including, among others, use of land for animal grazing) still need clarity. Now, if this is unclear and is not addressed in RPP (as it stands on the latest version) and they are not aware of these rights and entitlements, there are risks that their traditional land would be allocated to outside investors to plant trees under REDD+ arrangement.

**Recommendations:**

- To be effective, REDD+ or any forest-related policies must emphasize poverty reduction as the overall goal. Hence, we need **pro-poor REDD**.
- Traditional forest uses by indigenous and forest dependent communities (grazing land, collections of NTFPs like foods, medicines, vegetable, etc) should be evaluated and put into the overall benefit-sharing and other forest governance measures. These must be recognized and taken into account in any development plans including REDD+.

***Risk of biodiversity reduction. Commodification of carbon stock can increase the risk of converting natural forests of high biodiversity into plantations of poor biodiversity value.*** Powerful investors in plantations can get land concessions in natural habitats, like degraded forest, grasslands, which have value for wildlife and local communities.

**Recommendations:**

- **RPP must have explicit strategy and implementing requirements to protect all existing natural forest areas**, even degraded forests. Given a chance, they will regenerate and sustain biodiversity, our base of life.  
**Recognize importance of other natural habitats like grasslands or wetlands for provision environment services to communities and society.**

*Transaction and indirect costs.* Industrialized countries buying forest carbon in developing countries such as Vietnam still has a long way to go. In this case, there needs to be clarity and systems for cost-sharing and benefit sharing and requires coordination across all institutions including inter-ministerial, national and local governments, multilateral, bilateral and private donor financing.

Also, RPP still needs to provide clarity on the monitoring, reporting and verification (MRV) system on the design and implementation of reference emission level (REL)

Recommendations:

- **Transaction and indirect costs need to be independently monitored and minimized to ensure most payments reaching forest dependent poor communities.**
- Rights and responsibilities of all parties, including intermediaries (like carbon brokers, carbon buyers), need to be clearly defined.

- To realize the objective of REDD+ as outlined in the RPP, it needs to uphold and apply the basic elements of good governance including:
  - **Broad and meaningful participation of local forest stakeholders**
  - **Transparent design and implementation of REDD readiness and subsequent REDD investments**
  - Accountability of all REDD and forest stakeholders, including clear grievance mechanisms at the local and national levels
  - Protection of the basic rights as outline in the Vietnamese laws and UN systems

- **Recognition of indigenous knowledge and local initiatives for sustainable forest management**

**Take home messages:**

- **Quickly translate full RPP document into Vietnamese** and other local dialects and make the make available via website(s) and in other popular education materials.
- **Develop a clear and explicit strategy to protect existing natural forest areas.**
- Traditional forest uses by indigenous and forest dependent communities (grazing land, collections of NTFPs like foods, medicines, vegetable, spiritual and cultural activities, etc) should evaluated, recognized and taken into account in any development plans including REDD+.
- **In REDD pilot projects at village and commune levels**, incorporate REDD+ into local socio-economic development plan and land use planning and develop alternative livelihoods in concerned areas with the consent of affected ethnic minorities.
- **Build capacity of local government, institutes, local institutions including the ethnic minority on the principle and application of FPIC** in all phases of REDD+ activities and other forest management models.