



Recommendations from Tanzanian Civil Society with regard to Tanzania's Readiness Preparation Proposal to the Forest Carbon Partnership Facility

Tanzanian Civil Society Makes the Following Recommendations:

- The RPP clearly express Tanzania's support for a nested approach.
- The RPP recognize that almost all unreserved forests are on village land and that village land rights will apply under national REDD policies.
- The RPP recognize that carbon stored in forest biomass within village land is the property of the village.
- The RPP stipulate that community groups, civil societies and private sector should be represented on the National REDD Task Force.
- The RPP include a commitment to adopt and implement National REDD Community and Biodiversity Safeguards to complement World Bank safeguards.

REDD in Tanzania

Tanzania has wisely started to implement REDD readiness pilot projects before finalizing national REDD policy and institutional arrangements. The rationale for this is to use lessons learnt and findings from pilot projects to inform policy makers in developing a comprehensive national REDD strategy. We recommend that project findings and lessons learnt in the first year of pilot projects should be addressed in Tanzania's Readiness Preparation Proposal (RPP). This note sets out the key findings which we believe could strengthen Tanzania's ability to deliver REDD in an equitable, effective and efficient way.

Civil society in Tanzania, including Tanzania Forest Conservation Group (TFCG), Tanzania Community Forest Network (MJUMITA), Tanzania Natural Resource Forum (TNRF), Mpingo Conservation and Development Initiative (MCDI), Wildlife Conservation Society (WCS), Lawyers environmental Action Team (LEAT), Tanzania Traditional Energy Development Organization (TaTEDO), and CARE Tanzania, calls for the Tanzania RPP to address the following recommendations to maintain/enhance community rights and increase community and civil society participation in REDD activities. It is our recommendation that the RPP be approved conditional to the following key steps being taken by the government of Tanzania.

Recommendation 1: The RPP clearly express Tanzania's support for a nested approach.

The RPP mentions using a nested approach in reference to developing a baseline scenario, but does not expand upon this when it comes to awarding emission reduction credits to communities or projects for their verified emission reductions. Allowing communities direct access to REDD markets or funds will provide a much stronger incentive for reducing deforestation. Conversely, policies to restrict the use of forest areas on village land without compensating villages for their opportunity costs should be avoided.

We recommend that the RPP should specify that a nested approach will be adopted to allow community projects to be verified and credited independently within a national accounting framework to ensure REDD benefits reach communities.

Recommendation 2: The RPP recognize that almost all unreserved forests in mainland Tanzania are on village land and that village land rights will apply under national REDD policies.

The RPP refers to 57 % of Tanzania's forests as being on General Land. This interpretation of general land implies that villages don't have a legal right to use and manage forested land outside of village forest reserves, when in reality, most of the unreserved forest areas in Tanzania are on village land that villagers have a legal right to use. The confusion arises from Tanzania's 1999 Land Act, which defines general land as all land that is not reserved land or village land, including unoccupied and unused village land.

However, under the 1999 Village Land Act, which is the law that specifically defines village land (except in Zanzibar which has its own legislation), village land can include lands that are communally used (such as forest areas used for fuelwood), fallow lands, and lands reserved for future use. In addition, village land is legally established as village land if a village has commonly agreed boundaries with its neighbors even before the village is awarded a village land certificate from the ministry of lands. According to the ministry of lands, most villages have been surveyed and have legally established boundaries. Thus, the majority, if not all unreserved forests are on village land that should not be classified as general land.

The RPP should make it clear that most unreserved forests are on village land (apart from a tiny proportion < 1 % on private land). Classifying forests on village land as general land could encourage village land grabbing by unprincipled elites/investors, or even the transfer of REDD benefits from villages who are reducing deforestation to the government, which would compromise the rights of local communities and eliminate the incentive to reduce deforestation. The RPP correctly advocates strengthening tenure as a means to reduced deforestation. It should facilitate this process by recognizing the legal right that villages have to unreserved forests within their boundaries.

Recommendation 3: The RPP recognize that carbon stored in forest biomass within village land is the property of the village.

The RPP does not specify the rights of communities to directly access benefits from carbon credits attributable to their village land. It is expected that communities will devote time and resources to conserve forests with the expectation of getting financial benefits from carbon finance. However, their expectation might not be met due to the lack of a policy recognizing village carbon tenure. The RPP should give consideration to amending current forest policies to make clear that villages have tenure over the carbon on their land. REDD policy needs to align carbon tenure with existing land tenure.

Recommendation 4: The RPP stipulate that community groups, civil societies and private sector be represented on the National REDD Task Force, and in whatever body will replace the task force.

The national REDD Task Force was appointed by the government to identify challenges and opportunity and to develop the National REDD strategy. The Task Force has led the way in initiating the drive to REDD readiness in Tanzania. However, the time has come to extend membership of the REDD Task Force to include community groups, civil society organizations, and the private sector which are not currently represented on the task force. While the involvement of these kinds of groups is indicated in a permanent structure that will be established following the Task Force, this should be clarified as a priority to ensure comprehensive stakeholder representation and a more efficient flow of information between national and local levels on all aspects of REDD implementation.

Recommendation 5: The RPP include a commitment to adopt and implement National REDD Community and Biodiversity Safeguards to complement World Bank safeguards.

While the RPP does mention the need for social and environmental safeguards, and recognizes the World Bank safeguards, the RPP does not mention National REDD standards being developed by Tanzanian stakeholders in cooperation with the Climate, Community and Biodiversity Alliance. REDD in Tanzania should be conducted in such a way as to protect community benefits and ecosystem services including biodiversity. The RPP should reference the development of national REDD standards, to ensure that REDD activities in Tanzania have the protection of biodiversity and community rights as core guiding principles.

For more information please contact Charles Meshack, Executive Director, Tanzania Forest Conservation Group: cmeshack@tfcg.or.tz