

**COMMENTS BY THE Civil Society Mechanism (CSM) for CFS
on the HLPE V0 Draft Report on Sustainable Forestry
for Food Security and Nutrition (31 May 2016)**

18 July 2016

1. General comments

In general terms, the document presents interesting ideas, aimed at fostering better dynamics between forests, food security and nutrition.

Based on the experience of the organizations and communities represented at the CSM, the subject of this HLPE report is the crucial importance for the constituencies that have an everyday relationship with forests.

We are referring both to local communities, as per the concept used in the Convention on Biological Diversity (CBD) and indigenous peoples.

Many communities manage their forests as a source of food, health and spirituality, while also enhancing their rich cultures and providing them with building material for their homes, for instance. In some cases, we found that for some communities, forest management goes hand in hand with food sovereignty.

Worldwide forests are an intrinsic part of communities that have different degrees of dependence on them. It is therefore essential to protect both the forest and the rights of these communities.

In this regard, the report should clearly differentiate between rights-holders and stakeholders and between public and private interests. The interest of future generations and the interest of forestry industry cannot be simply listed as being the same, as it is in the Table 11 (page 74).

The report also lacks of a sense of urgency to tackle deforestation and forest degradation. Reading the report does not generate any compelling reason to act or to do something different. The description of the challenges is very “plain” and does not create any political, emotional or scientific urgency to engage in a significant change of course.

2. Gender

On page 30; Box 9, page 86; Box 28 and page 87; Box 29, “Gender issues and Empowering women” is given a token mention.

The different roles and responsibilities of men and women is mentioned in passing but there is no mention of the different needs of both men and women in forestry. This subject of Gender Equality and Equity must be paid the great attention it deserves, examining equality and equity of the genders in forest use, management, governance, security of tenure. In other words the rights of both men and women not only to access but to control and make decisions regarding forest resources must be addressed adequately.

On page 25, Indicative figures for forest dependence should be gender-disaggregated

3. Climate Smart Agriculture

We recommend that Climate Smart Agriculture not be used, due to the fact that this concept is one of many tools and proposals that have come to be known as false solutions – if not, real traps. It represents a misappropriation of peasant and indigenous family farming and a way of legitimising the practices of large corporations, which believe that they are carrying out a more socially and environmentally friendly activity, by introducing initiatives, without changing their production model. Moreover, this concept builds on a series of options that are not feasible for food sovereignty and nutrition, such as genetically modified organisms.

Technology cannot fix everything. There are harmful practises that cannot be “domesticated by technology” and should simply be discontinued. In this respect, some unjustified optimism often transpires throughout the report with respect to the possibility of finding new ways to combine the economic motives (income generation, growth, etc.) with ecological and livelihoods imperatives. Remarkably, the report never suggest which ones, only the belief that they could be found.

Furthermore, the report often promotes economic approaches and concepts that promote the commodification of nature.

4. The definitions of forests

On page 11, Box 1: FAO's definition of forests has been contentious given the gaps, simplicity and lack of precision, which overall generate serious problems. Even though the definition used in the draft report excludes urban parks and agricultural tree crops from the definition of forests, among other differentiations, the problems persist. First of all, FAO's definition continues to be a reference point and largely determines the definitions used by different countries; as explained in this section, the complex process behind explaining and justifying a new definition leads countries to continue using FAO's definition.

On the other hand, the technical difficulties of clearly differentiating between different types of forests and the distinction made between forests and tree-based configurations of some kind are not involuntary in nature, but rather, often the purpose is to present monocultures and plantations as forests. Therefore, deforestation and the loss of rainforests is facilitated and promoted by monocultures. In some countries, such as Indonesia, there are official policies for the creation of palm oil plantations mostly on areas that have been deforested for that purpose. This is also the case with pine, eucalyptus and palm plantations in Central America, Brazil and Colombia. Even though the draft report makes a distinction between forests and plantations, there is ambiguity on these concepts throughout the text, for example on page 16, line 10 there is a mention of "planted forests".

On the other hand, this definition applies a low percentage of forest cover and density, which makes it easier for healthy rainforests, with really high density and cover, to be targeted for non-sustainable exploitation by companies or illegal loggers. This currently very common practice leads to degradation and yet, in light of this definition, it is not problematic as they would be considered and identified in reports as forests or rainforests. Lastly, this definition sidelines a social and cultural approach by ignoring that these territories are home to millions of inhabitants from different peoples and that forests are also the result of a process of anthropogenic construction (Bitencourt and Krauspenhar,

2006; Martins, 2005; Peroni, 2002 and Stefenon et al., 2007).

In 2014, La Via Campesina, Friends of the Earth International (FoEI), Focus on the Global South and the World Rainforest Movements (WRM), wrote an open letter to the FAO on the occasion of the International Day of Forests (21st of March, 2014), which is available at: <http://wrm.org.uy/all-campaigns/open-letter-to-fao-on-the-occasion-of-the-international-day-of-forests-2014/>. In the letter, the organizations urged the FAO to review its present definition of forests, which mainly benefits the interests of the timber lobby and the industrial tree plantation companies for pulp/paper and rubber. The organizations invited the FAO to take the initiative to correct this misleading definition. This would benefit millions of people who depend on forests, and humanity as a whole, as well as thousands of rural communities that are fighting against the invasion of their territories by industrial monocultures of trees, falsely defined as "forests" in accordance with FAO's present definition.

Friends of the Earth International (FoEI) and the World Rainforest Movement (WRM), among others, make several documents available on their webpages, which explain the impacts and consequences of not making a clear distinction between the two concepts. The reasons and arguments behind this request have been sufficiently explained, but they can be summarised in the argument put forward in the draft report at the end of the section on plantation forests (2.4.4): "The contribution of plantation systems to FSN and livelihoods is often at the cost of negative environmental and social impacts" (page 24, lines 9 and 10). In this respect, we believe that section 2.4., together with other similar affirmations made at several instances, is very pertinent. We suggest that the document be redrafted along these lines in order to avoid ambiguities.

5. Sustainable Forest Management or Community Forest Management (SFM or CFM)

The use of the term 'sustainable' opens the door to activities that are carried out by large corporations, which, by definition, cannot be part of a sustainable model. Additionally, in some cases, this concept allows for the usage of heavy machinery in forests; in rainforests the varied negative impacts are huge. Similarly, if we were to use the term, we would be reinforcing existing power structures, which over the centuries have proven to be exclusive, privatizing and mainly profit-oriented. Instead, it should be used the concept of community forest management (CFM).

The CFM refers to regulations and practices used by many communities for the sustainable use and conservation of forests, with which they coexist. This type of management is collective and community-led. Traditionally, it is related to the protection of forests and challenges the industrial and market-led use of forest resources. It is also related to traditional knowledge as an alternative to so-called "forest science", which builds on simplified models and the supposition that destruction is "reversible", which in many cases has led to the devastation of forests and to severe social injustice.

The concept of CFM opens new horizons-new spaces where communities have control over their territories and resources, through horizontal decision-making processes, which include transparency and community accountability. The concept covers a wide range of possible situations, from the wise and specific use of forests by indigenous societies, to peasant and urban communities that use and care for nature reserves; from the artisanal

use of primary forests by gum collectors in the Amazon, to forest restoration by peasant communities that live in severely degraded zones. The use of this concept sheds light on the strategic relationship between community management and food sovereignty as well as on the improvement of nutrition.

Even though the draft report makes some references along the lines of CSO positions, we believe important to use the concept of community forest management and to analyse the concept of sustainable forest management in depth, especially in terms of their contribution to food sovereignty and nutrition.

It is now necessary to strengthen this type of practices, and to this end, we suggest the following:

- **clarity on the limits of the community forest area:** clarity on the limits of the managed area avoids conflicts with other owners, it allows for better knowledge of the resource, maps and other useful tools gives the community confidence regarding issues of tenure. Land tenure is key and is also a recognised right in many international agreements.
- **community knowledge on the characteristics of the resources:** the more knowledge the community has on the forest and its elements, the better they can plan and regulate its use. Traditional knowledge or knowledge acquired on the area, climate, geography, biology and uses of biodiversity elements, among others, is fundamental for resource management and planning, as this type of knowledge in turn demands respect for different elements. In order to protect this traditional knowledge, territories where it plays out need to be protected.
- **participatory design of regulations on community use of resources:** wide participation in the regulation of the use of resources. There is plenty of information and agreements regarding norms. This is achieved through a process, during which effective education and communication tools need to be developed;
- **an expedite system of vigilance and monitoring:** complying with regulations demands effective and expedite systems of auditing, accountability and vigilance.
- **legal recognition of the recourse by the state and legislation:** in our world today, politically defined by states, community resource management is an act of decentralisation. It is not about weakening state power, but rather to support it in its sustainable use of resources. The recognition and regularisation of community management facilitates and legalizes this type of relationship with forests. All governments should recognise, protect and promote the rights of indigenous peoples and local communities, their access to natural resources and their traditional knowledge, be it at the national or international level. This means that policies and laws need to be put in place in order to underpin and strengthen traditional territories that are under the control of communities, and finance is needed for the effective implementation of these measures. It also implies the recognition of the importance of collective tenure of community land. Governments must also help to map the delimitation of community forests, evict illegal loggers and provide practical assistance to CFM.

- All governments must guaranteed that CFM is developed in such a way that the autonomy of communities is promoted, land tenure aspects clarified and guaranteed, community rights and access to land and resources protected, respecting and recovering traditional knowledge.
- This needs to be complemented with the promotion of small-scale timber production, local markets and solidarity economies, protected from the rigours of global competition. Some important activities include the expansion of agroecology and agroforestry activities, as well as technical support and relevant capacity building.
- CFM and the community management of other resources should be chosen as a policy to reach Aichi Goal 11 of CBD, instead of Protected Areas.
- The CBD and the United Nations Framework Convention on Climate Change (UNFCCC) must reject false solutions, such as REDD+ and policies that lead to the "commodification of nature".
- The CBD and the UNFCCC must guarantee that debates on the financialisation of conservation, biodiversity and mitigation and adaptation to climate change support and promote genuine CFM initiatives instead of "innovative financial mechanisms".
- Communities that use forests need to be provided with the following support by the state: basic infrastructure; strategic planning spaces to face up to the problems around resources and climate change; capacity building on new information technologies; and policies for financing and facilitating the recovery of traditional knowledge. It is also important to keep gender aspects in mind in conservation and biodiversity management.
- Additionally, it is important to revert or eliminate the multiple threats against CFM. That implies reducing the use and demand for food and timber products that are made at the expense of deforestation. But above all, it is fundamental that all CFM approaches reject industrial silviculture as a starting point. Decision-making on forests and resources should be returned to those who know and understand what is needed: local communities and peoples.

There is an increasing amount of research that demonstrates that CFM is both a viable and equitable solution to deforestation, forest degradation, loss of biodiversity and climate change. Genuine CFM is an attractive win-win policy, which also protects forests and contributes to social and economic justice, decentralising power and decision-making regarding forests, resources and territories, while protecting and strengthening community rights and means of subsistence. CFM also contributes both to the mitigation of climate change (by reducing deforestation) and to the adaptation of its impacts, especially in coastal communities. It has been demonstrated that forests and community forest management, along with other related activities have contributed to protecting people against extreme weather conditions.

In addition, it is worrying that the narrative of 'increasing agricultural production to feed the growing planet population' put the 'economic' use of various types of forests and their

resources as one of the driving arguments throughout the report.

6. Ecosystem services

Despite the wide acceptance of this concept, we also recommend against its employment and to replace the term with functions of Nature. No local community or indigenous people in the world see fruit or food as a service provided by Nature, but rather, as something natural that is there to take and satisfy basic needs.

The concept of Ecosystem Services is rooted in a development system, which tends to put individual before collective benefits: it privatizes the commons and prioritizes profit as a goal. It is a concept that facilitates the purchase and sale of Nature; it is a step towards a process of commodification of nature. Moreover, it creates new relations with Nature: Caring for nature is a given because that's the way it has always been. It builds on the premise that we have to care for nature as long as there are economic resources, and if these cease to exist, forests are cut, giving way to monocultures. We have witnessed this phenomenon in Costa Rica, in a case that was documented by COECOCEIBA-Friends of the Earth Costa Rica. Chapter 3 of the draft report takes this approach, and we recommend it be further developed.

7. REDD

Page 60 - Lines 18 and 19, page 61 lines 1 to 10.

This part of the draft report reflects a highly risky tendency to simplify the view and interpretation of forests and rainforests in terms of carbon. This tendency has been on the increase since the first REDD proposals were made in the framework of the UNFCCC, simply reducing the importance and multiple dimensions of the forests to their capacity to capture and storage carbon. This response essentially has economic purposes. Of course, the report claims that protecting forests, based on their functions in climate mitigation, could provide an opportunity for objectives related to food security. However, this argument ignores the many values of these territories – cultural and spiritual values as well as usage values. Their permanence should be guaranteed for these reasons, and not for their commercial value. This reductionist vision is precisely related to the cause of deforestation and forest degradation as quoted in page 57 of the draft report: "conventional traditional attitudes and practices that attach low value to biological resources [FAO, 2015]".

Page 64 - Box 21

The impacts of the implementation of REDD+ and the mentioned concerns are not a probability, but rather a reality. This can be seen in REDD project contracts that have already been signed by forestry companies/agents and indigenous peoples or local communities, sometimes in conditions of misinformation or even misleading information (FoEI, 2013). We strongly believe that the report should shed light on these impacts and delve further into these issues.

This report analyses different REDD+ contracts, where companies clearly violate the rights of communities. This is made explicit in clauses that prohibit essential productive practices, such as agriculture, which obviously hampers the realization of the right to food. Moreover, restrictions are imposed on the sovereignty over territories: Contracts establish

that companies and their allies (without specifying who they are) can enter and carry out prospecting of natural heritage, rather than protecting rainforests in order to keep stored carbon intact. Similarly, obligations are imposed upon communities, such as having to grant permission to company agents to enter at all times and guarantee their movement, to comply with imposed clauses and to renew contracts for a period of up to 30 and 80 years before the end of their validity. Based on our experience, REDD leads to a division of communities: Promises of financial resources are made, but they never arrive, forests are privatized, rights are eroded, and the right to protect traditional knowledge is violated, among other situations. Added to this, there is ample proof in the extensive literature that analyses the impacts of REDD, and therefore there are plenty of arguments for considering this strategy as extremely problematic, as it undermines sustainable forestry management and food sovereignty.

Page 9, line 17. "Agricultural expansion is the largest single cause of deforestation."

This statement needs to be more clearly defined in order to specify what type of agriculture it is referring to as the largest direct cause of deforestation.

Family farming is not responsible for the increasing rates of deforestation, as it is very unlikely that peasant and indigenous farmers and local communities can increase the size of their agricultural plots. On the contrary, one of the main problems that they currently face is the loss of land and subsequent displacement, in a wider context of loss of territorial sovereignty.

Agribusiness is the type of agriculture that is associated to the advancing agricultural frontier and is responsible for land grabbing for monocultures of soya, oil palm or sugar cane, as well as for logging in rainforests to give way to pastureland for extensive livestock farming. In both cases, the scale of activities corresponds to models of high financial investment, machinery and inputs that are not consistent with the logic or possibilities of family farming, but rather of the production models of large corporations and private investors.

Page 9 - Line 44

The analysis of the impacts should not be restricted to the tropics as it should also include equatorial regions where we find the largest rainforests (Amazon, Central Africa, South East Asia and Pacific Islands) with the most biodiversity; all the more so if the goal is to analyse sustainable silviculture, agriculture and food.

It is necessary to draw a distinction between tropical regions, located along the tropics of Cancer and Capricorn, and equatorial regions, located along the equator. There are significant differences between the composition, structures and functioning of forests in these regions, and that's without mentioning the social, cultural and tenure-related issues.

Page 37 - Table 2

The indigenous people Bari live in Colombia, but in the region of Catacumbo, which is not in the Amazon basin, as stated in Table 2.

Page 48 - Table 6

The estimates on employment in the forest sector frequently refer to absolute figures, which can lead to errors and misinformation regarding the importance of this activity. Therefore, a meticulous revision of the sources and methodology for these values is highly

advisable.

The reason why relative figures should be presented is because it is crucial to shed light on the impacts generated by the industrial/forestry sector. In countries of the global south, forestry monocultures, and not forests, are established in territories previously occupied by rainforests or native ecosystems for the production of pulp and timber. This has a severe impact in terms of loss of diversity and ecosystem functions; in some cases the production of pulp by multinationals is at the expense of deforestation of tropical humid rainforests, as was the case in Bajo Calima in Colombia (Broderick, 2007).

In addition, calculations on forestry-related employment do not usually disaggregate employment between permanent and seasonal, and in fact, most employment is indeed seasonal and generated only when workforce is needed, i.e. during the plantation and processing activities, while during tree growth years, the workforce required is minimal. Moreover, figures for previous permanent employment in agriculture for instance, and which has been lost and not replaced, are not provided.

8. Deforestation and Forest Degradation

Page 57 - Lines 12 to 22

Over-consumption is indeed a cause of deforestation and forest degradation in rainforests across the Global South, but it should be highlighted that the excess consumption is concentrated in industrialised countries and not in those countries where there is a loss of forests: The per-capita consumption of paper in Western Europe and North America is clearly a case in point.

Similarly, it should be noted that the responsibility for the underlying direct causes of deforestation, as cited in this part of the report, are not necessarily borne by the inhabitants of these territories. On the contrary, quite often companies and economic agents of industrialised countries bear the responsibility. The extractive industries are one example, as they destroy rainforests to establish intensive agriculture or forestry, highlighted as the causes of deforestation in this report. If we closely review these industries, we see that they are run by corporations with headquarters in countries in the north, generating economic revenues from the exploitation of soya, oil palm, eucalyptus or mining, at the expense of local ecosystems. Clearly, they contribute to the underlying cause as their behaviour is that of "conventional traditional attitudes and practices that attach low value to biological resources", as quoted by the FAO (2015).

9. Dietary transitions

Dietary transitions (page 17) and the relation between income and diet (page 47) are described as natural phenomena to take as given. While this is not the objective of this report, it should be observed that diets and dietary patterns are also the results of public policies, or often the lack of them. The report should acknowledge that there are mounting policy engagements, with significant resistance by the corporate sector, to promote healthy and sustainable diets and, if successful, these efforts may profoundly alter the dietary transitions that the report consider as given.

10. Conclusions of the Document

- As it was said above, the report lacks of a sense of urgency to tackle deforestation and forest degradation. This is problematic, as the level of ambition of the recommendations is closely connected to the urgency for change that the report puts forward;
- Following the above mentioned argument, we do not share the message that says: "Payments for Ecosystem Services and other compensation schemes can enhance the provision of such services and support sustainable forest management". We believe that it is necessary to proceed to an exhaustive review of the concept and of existing systems, before defining them as positive aspects. Our experience has been negative and in addition, these payments often end up replacing national policies that provide public funds for community forest management and food sovereignty, just to mention two areas;
- The first recommendation of section 2 (page 102 lines 16-17) it is problematic as it brings in the income generation and trade dimension in a very forceful way. Equally so lines 31-32 as co-management and co-production have provided a significant trail of negative records, as they often turn in more or less forced co-option of local communities;
- Line 35 seems to suggest that direction of "coherence" is that of ensuring that the local is coherent with global solutions. We would say that at the very minimum the direction should be a two-way one, if not the opposite (global solutions needs to be coherent with the local);
- On page 102, lines 18 and 19 it says: "Develop marketing information systems for NTFP and other forest goods and services to promote the development of small-scale social forestry enterprises". This should be carried out within the framework of solidarity economies, given that the dominant economy does not favour community production in any way whatsoever;
- In line 22, on the same page, it says: "Integrate FSN concerns in forest certification schemes". We believe that an in-depth analysis of the certification schemes listed in the report is needed. Certification is a tool that allows for the sale of goods by guaranteeing that they meet certain social and environmental standards. However, based on our review of the environmental aspects of FSN, we find that there is a huge gap, sometimes unsolvable, between discourse and practice;
- We agree on the following message, on page 103, lines 36 to 38: "Consider how the implementation of mechanisms and other initiatives that are designed to address climate mitigation and/or forest conservation (e.g., REDD+) will affect local communities' access to forest foods and how this might impact dietary quality". As mentioned above, based on our experience, REDD does not have any positive impacts;
- On page 102, line 42, it says: "Promote use of "climate smart" agricultural technologies, agroecological solutions, and agroforestry practices for FSN". As

spelled out at the beginning of this document, we believe and suggest that this concept of climate smart agriculture should not be used.

- On page 103, line 13, it says: "Encourage international certification and corporate social responsibility as an integral part of forest management enterprise, as a means to respect and uphold the rights of women and indigenous peoples". As explained above, we believe that this is related to human rights, and therefore, all actors should protect and promote them. Although we suggest the message be worded differently, or deleted, a clear rights-based framework with enhanced justiciability must prevail at the report.
- On page 103, line 21, it says: "Respect and uphold the in situ protection of traditional knowledge of local and indigenous peoples and, through collaborative initiatives, incorporate it into management practices and policies to enhance the productivity and resilience of forest and tree-based systems". As stated in the section on CFM, in order to achieve this, the right to territory and autonomy should be guaranteed, as both can be found in several United Nations conventions.

Civil Society Mechanism for CFS

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