

Comment on 'National Forest Policy 2016 - Final draft'

Submitted by:

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Introduction:

The present document contains inputs to the National Forest Policy process in Tanzania based on our reading of the 'National Forest Policy 2016 - Final draft'. In it, we outline and discuss some of the general themes in the National Forest Policy (NFP) and provide recommendations.

Fire:

The NFP mentions 'fire', 'wildfire' and 'uncontrolled fire' in several places and often as contributing to forest degradation, desertification, CO2 emissions and other undesirable outcomes. However, this treatment of fire overlooks the fact that fire is an integral component in the ecology of dryland forest resources – such as miombo woodlands (Frost 1996; Homewood & Brockington 1999; Ryan & Williams 2011). Thus, the suppression of fire – which is clearly promoted in the NFP – is counterproductive in miombo woodland ecosystems and can even backfire in the form of buildup of biomass that leads to more violent and uncontrollable fires in the long term, which is, for instance, the US and Australia experience with a century of fire suppression policy (van Wagtenonk 2007).

Recommendation regarding fire: The NFP should clearly distinguish between different forest types in discussing the risks associated with different fire management approaches.

Grazing:

The NFP mentions 'grazing' and 'overgrazing' in a number of places and often as contributing to forest degradation, desertification, and other undesirable outcomes. However, this overlooks that a major and important use of woodlands by rural residents is for seasonal grazing, and that this is becoming increasingly important as other sources of seasonal (especially dry season) grazing are enclosed for purposes of conservation (e.g. wetlands, some WMAs, GRs, etc.) and agriculture is expanding. There is no clear evidence that grazing leads to forest degradation (Saberwal 2006; Reid et al. 2014), nor that domestic livestock competes with wildlife (Goldman 2009; Niamir-Fuller et al. 2012). There is, however, evidence

that CBFM villages have obtained significant forest revenues from allowing for dry season grazing, and that this has been an important mechanism to finance local management and control – without any discernable negative consequences to the forest ecosystem (Green & Lund 2015; Lund et al. 2015).

Recommendation regarding grazing: The NFP should promote grazing in CBFM forests as a means to garner local revenue to finance sustainable forest management

Unreserved forests: The NFP notes how unreserved forests undergo more deforestation and are largely unmanaged. We agree and note how there is potential for legislative reforms that would garner stronger incentives for local actors to sustainably manage and possibly reserve such forests. However, for this to happen, such legislative reforms must deal with a number of thorny issues. First, the forest and land legislation – in particular its interpretation in practice – allows central government forest officers to allocate licenses to harvest trees with minimal benefits accruing to villagers (Sungusia & Lund 2016). This clearly works as a disincentive for local forest management. Second, the current emphasis on detailed planning and harvesting regulations within CBFM forests – and the absence of such considerations for non-reserved forests on village land - concentrates harvest to satisfy the demand for timber on unreserved forest areas, which diminishes the value of reserving forests in the eyes of villagers, while increasing pressure on unreserved forests that are harvested without any considerations for sustainability (Sungusia & Lund 2016). Third, the costly and bureaucratic planning requirements for CBFM – and the unclear legal implications for local autonomy to decide future land uses associated with CBFM – creates disincentives for CBFM locally (Green & Lund 2015) as well as hindering its wider application by making its implementation prohibitively costly to support for forest officers (Lund 2015; Scheba & Mustalahti 2015). Finally, the rapid growth in wildlife (and forest) conservation initiatives, as well as initiatives to facilitate investments in plantations and agribusiness, that all target apparently ‘unused’ village lands – and the rushed and manipulative land use planning process characterizing these initiatives (Homewood et al. 2015; Bluwstein & Lund 2016) - compel rural residents in Tanzania to protect their authority over village land by clearing unreserved forests (Sungusia & Lund 2016). Thus, in sum, a number of fundamental land and forest legislative issues currently stand in the way of local sustainable management of unreserved forests.

Recommendation regarding unreserved forests: The NFP should support clear and unambiguous rights to villages to manage and benefit from (the harvesting and sale of) trees on unreserved parts of village land. This includes acknowledging the status of village land – as set out in the Village Land Act of 1999 – and respecting the rights of villages to veto harvesting of trees on non-reserved areas of village land.

Village land use and forest management planning: The NFP mentions that many forests are managed without a management plan and calls for more widespread use of planning. Following the above discussion of planning requirements in relation to ‘unreserved forests’, we note that the issue of forest management planning should be considered carefully to prevent a de facto promotion of cumbersome, overly detailed as

well as costly planning requirements and procedures that may be of limited relevance to actual uses of many forests in Tanzania. Rather, emphasis should be on minimum planning requirements that aim to (i) safeguard overall resources sustainability and (ii) support rather than burden local forest managers. Further, there are many examples across Tanzania of village land use planning processes that villagers perceive to be rushed and manipulative, and which have resulted in contestation and confusion, rather than clarity, concerning land tenure (Homewood et al. 2015; Bluwstein & Lund 2016). In the current context of the rapid growth in wildlife (and forest) conservation initiatives, as well as initiatives to facilitate investments in plantations and agribusiness, all of which target apparently ‘unused’ village lands, such rushed village land use planning processes compel rural residents in Tanzania to protect their authority over village land by clearing unreserved forests (Sungusia & Lund 2016). Accordingly, a truly participatory and locally-driven village land use planning process is needed.

Recommendation regarding village land use and forest management planning: We recommend that planning and harvesting regulations pertaining to CBFM forests are radically simplified to make their implementation affordable for forest offices and villages alike, and to align planning requirements (including costs) with the uses and benefits obtained from forests. For dry miombo forests that are used mainly for woodfuel extraction and grazing, this would imply a very simple and cheap management approach, whereby overall sustainability of management is ensured by, for instance, periodic forest walks coupled with analyses of freely available GoogleEarth imagery for the forest in question. Concerning village land use planning, we recommend that legal guidelines are issued, specifying clear minimum requirements which ensure that suitable time and effort is put into a thorough consultation process that empowers village communities to steer and guide, rather than being steered and guided, towards a land use plan.

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