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**NATURAL JUSTICE COMMENTS ON THE PRELIMINARY DRAFT FORESTRY  
BILL: VERSION FOR PUBLIC CONSULTATION (APRIL 2022)**

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## **1. INTRODUCTION**

Mozambique has introduced its preliminary Forest Law (the law or Law) for public consultation. Internationally, there is no international instrument for forest protection. Thus, forest protection is now developing on a regional and national level. However, there are international environmental instruments that relate to forest protection such as the United Nations Framework Convention on Climate Change (UNFCCC), the United Nations Convention to Combat Desertification (UNCCD), the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and the Convention on Biological Diversity (CBD). Currently, there are provisions in the Paris Agreement, Article 5, for the protection of forests since they are carbon sequestrators.

## **2. NATURAL JUSTICE**

Natural Justice: Lawyers for Communities and the Environment is a non-profit organization rooted in the struggles of communities in African. As a Pan-African organisation, our mission during this time of planetary crisis is to use legal empowerment, research, litigation and advocacy to stand with Indigenous peoples and local communities who defend themselves and their ecosystems against environmental impacts, and who assert their rights as stewards and custodians of their lands, natural resources and traditional knowledge. Natural Justice works at the local, national, regional, and international levels with a wide range of communities and partners. We strive to ensure that community rights and responsibilities are represented and respected at the broader scales and that gains made in international fora are fully upheld at lower levels.

## **3. SPECIFIC COMMENTARY**

### **3.1. FOREST GOVERNANCE**

#### ***3.1.1. BACKGROUND***

Environmental law in Mozambique has been fragmented providing an array of complexities on how environmental governance and institutions can effectively function. Currently, there are many different laws and systems that are being used to protect the environment. This has since allowed

corruption to capture these institutions, procedures, processes, programmes, and personnel working in government departments. This law, like many of the environmental laws in Mozambique, lacks a proper framework that recognises the socio-economic and environmental importance of natural forests. If left unattended it will add to these many complexities that continue to make environmental laws ineffective in Mozambique. Thus, there is a greater need for the governmental departments to cooperate and coordinate with one another for forest protection.

- *3.1.2. ENVIRONMENTAL PROTECTION*

Forest laws are to protect forests since they are not protected internationally by an environmental instrument. This law does not protect forests, rather it is an economic instrument that has been set out to legalize the rights to log or trade, and partake in other environmentally degrading activities on forest lands. It has been set out as an economic instrument with no consideration of the important parts of forest protection.

- *3.1.3. DEFINITION OF FORESTS*

The definition that has been provided for natural forests is like that of planted forests. The law should have made it clear that there is a huge difference between natural and planted forests. This leaves room for loggers to clear natural forests and plant trees that grow faster. These are some of the introductions that have been put forward for Mozambique to plant more trees and enter the carbon market. This puts native tree species in danger of being cleared off in Mozambique. Furthermore, natural forests are a habitat to indigenous species; these species require these native tree species for survival.

- *3.1.4. SUSTAINABLE FOREST MANAGEMENT (SFM)*

SFM is one of the most important international concepts on forest protection in the 21<sup>st</sup> century. Since there is no international instrument, there has been efforts to recognise this concept under the CBD. The law does not mention this important concept which is aimed at balancing the socio-economic and environmental needs of forests. To be precise, without this concept, this law stands

as an economic instrument which legalises logging and environmental degradation since there will be no balance between these arms of sustainable development.

- *3.1.5. PRINCIPLES*

Considering forest as a reservoir of biodiversity and in the context of biodiversity erosion, risk of the sixth largest mass extinction of species and efforts to reduce biodiversity net loss, fragmentation of ecosystems and constant alteration of environmental regulation depending on political-institutional cycles, the law should include principles such as: non-regression to ensure that the protection provided by laws and regulations are only subject to constant improvement and the principles of ecological solidarity continuity to guarantee the interaction between the ecosystems and between natural and socio-cultural ecosystem.

- *3.1.6. NATURAL RIGHTS*

The law should have done more to include natural rights into its sections. There is a need to protect this constitutional right in Mozambique. There are also many species that are in forests, thus the law should have done more to preserve this life and biodiversity in natural forests. Forests are also a source of income for many communities, which helps them remain afloat by bush-hunting and gathering fruits or vegetables. The law should have done more to protect these sources of living and earning of income. Furthermore, there are communities that practice their religion and cultures in forests. The law does not protect these individuals or communities, and it should have done more into this. In addition, there is a growing number of people doing recreational activities such as hiking, camping and mountain biking. These individuals require protection, since these activities improve people's mental and physical health.

- *3.1.7. FOREST CERTIFICATION*

Forest certification is an instrument that could strengthen the contribution of companies to forest law enforcement. A first contribution is its requirement to maintain mutually beneficial relationships between companies and communities. Secondly, certification can act as an important incentive to legality when it is used as an indicator to reduce the legal requirements for forest

management, which allows at the same time to diminish the workload of the forestry authority that in this way can concentrate its efforts on other priorities. Perhaps certification could do even more by linking (through ‘conditions’ and ‘recommendations’) the achievement and maintenance of this recognition to the accomplishment of specific measures against illegal logging and poaching. The forestry sector in Mozambique has been growing and developing. Furthermore, forest certification can reduce the trade of illegally logged wood, timber products and logs. Its main purpose is to reduce the international trading of illegally logged timber products, with a view of reducing deforestation and legalising sustainable trade. This law mentions forest certification in passing, it does not explain further, this is inadequate and insufficient for forest protection. This should have been explained further to reduce overexploitation of forest products and resources.

- *3.1.8. LOG-TRACKING SYSTEM*

Complementing ground monitoring with the implementation of a log-tracking system would offer the opportunity to tackle the problem on a more comprehensive basis. One important concern here is the availability of sufficient financial resources.

- *3.1.9. LAND RESTORATION (LULUCF)*

One of the most important programmes under the New York Declaration Forests is how we need to restore degraded forest lands. Although it is a voluntary and non-legally binding pledge, the declaration sets out important principles for forest restoration. The law does not have forest restoration programmes to rehabilitate degraded forest lands.

- *3.1.10. SPATIAL PLANNING*

Population growth and a consequent demand for forestry products exert a huge pressure over natural resources. There is a need for this law to coordinate and cooperate with spatial planning laws since Mozambique's population has exerted some pressure on the natural forests. Without proper spatial planning (zoning), forests will be cleared for human development.

- *3.1.11. ENVIRONMENTAL IMPACT ASSESSMENTS (EIAs)*

In line with other environmental laws, EIA plays a huge part in reducing significant environmental damage. The law needs to develop this process and make it a prerequisite for any projects that may cause environmental degradation. Mozambique suffered an illegal logging rate of 81% between 2007 and 2012, increasing to 93% in 2013, if logging continues at the same rate, the standing stock of first and precious class species will be completely logged out by 2029.

## **3.2. NATURE OF FOREST AND IMPORTANCE**

**3.2.1. FOREST FUNCTIONS:** Forests are multifunctional and have different importance depending on communities and region. This law does not recognize the important functions of forest, thus some of the valuation of forest resources and services are still unprotected and underutilized.

**3.2.2 FOREST AND CLIMATE CHANGE:** Forests play a major role in reducing carbon by carbon sequestration. They take up to 25% of atmospheric carbon fixing it into the soil. There are international instruments that have recognised this function of forests such as the UNFCCC, Kyoto Protocol and the Paris Agreement – this has led to REDD/+programmes. The law recognises such an important role, however more clarity on how Mozambique is even going to go further and harness this vital forest role is lacking. Importantly, the law lacks a recognition to native matured natural forests – this could lead to programmes that focus on alien tree plantations that grow faster for carbon sequestration. Some of these REDD+ programmes are controversial as they can affect indigenous lands and tree species and matured forests.

## **3.2. NATURE OF FOREST AND IMPORTANCE**

- *3.2.1. FOREST FUNCTIONS*

Forests provide primary, secondary and tertiary services. Forests are also multifunctional and have different importance depending on the communities and region. This law does not recognize the important functions of forests, thus some of the valuation of forest resources and services are still unprotected and underutilized. It is retractable the non-inclusion of the symbiotic relation between natural and socio-cultural function of forest. Forest are not just resources; they give meaning to

lives of many communities, which tradition have been perpetuating for millenniums. Forest services have been continuously neglected in the conventional economy, and those who sustainably manage forests.

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- *3.2.3. BIODIVERSITY PROTECTION*

Forests are biodiversity “houses” habitats for many other species. This law does not recognize that there are other important species’ habitats in these forests and need to be protected by and under this law. Protecting forests is key to this - they cover almost a third of the global land area and harbour most of the Earth's terrestrial biodiversity. Forests contain 60,000 different tree species, 80 percent of amphibian species, 75 percent of bird species, and 68 percent of the world's mammal species. Forest biodiversity is the foundation of many ecosystem services, and individual species traits play an important role in determining ecosystem functioning and processes.

- *3.2.4. NON-TIMBER FOREST PRODUCTS*

The review of the law, must consider challenges such as the need to value non-timber forest products, acknowledging their economic, social, and cultural importance; include climate change issues; and boost from just two to four per cent its contribution to the GDP. Non-timber forest products are important to rural communities who consider forests as their safety nets. Thus, the

law should consider recognising these non-timber forest products and go further in protecting poor communities.

- *3.2.5 SOCIAL AND CULTURAL FUNCTIONS*

The law does not sufficiently recognise this important function of Mozambican forests. Forest trees, the links between the sky and earth, often symbolise links between the spiritual world of ancestors and people. Rituals and ceremonies which draw on forest symbols often serve to link people with their cultural heritage, as well as their ancestral past. There are a variety of cultural values and symbolic functions ascribed to Mozambican forests, as numerous and diverse as the communities and cultures of the country.

Furthermore, forests provide the venue for many cultural events. Trees serve both practical and symbolic judicial roles. Symbolically, they can represent mediators or decision makers. Practically, they are physical boundary markers that define property and provide evidence of usufruct rights in judicial disputes. In many parts of Mozambique, forest areas and specific trees are protected and valued for cultural occasions and as historic symbols. Each community has its own traditions associated with sacred areas and, as a result, the species that are found in them vary greatly. Physically and mystically forests have defined the environment of communities in the region throughout time. Forests provide a range of products for traditional ceremonies from food and beverages to costumes and musical instruments. While some of these products are perhaps less often used on a day-to-day basis, they still form essential elements of a variety of cultural traditions. Tangibly and intangibly, forests feature in all aspects of culture: language, history, art, religion, medicine, politics, and even social structure itself.

In African traditions, forest trees may house the spirits of ancestors as well as those of the newborn. And forests are viewed in both positive and negative lights as sources of evil as well as power and munificence, as providers for, and hindrances to development. The mystical qualities of specific forest resources often play a crucial role in traditional healing practices. Forests provide the venue for religious, social, and healing ceremonies. Forest products such as tam-tams and forest foods such as palm wine are used in many ceremonies. Assessing the myriad of symbolic and cultural values of forests goes far beyond the scope of this study. However, this does not diminish their importance in terms of the value people place on forests and forest resources. The law should have



gone further to protect forests and illustrate some of the ways in which forests are culturally and symbolically valued. This also requires deep understanding and research on forests and indigenous cultures. Thus, information on the cultural significance of forest resources can be gleaned from anthropological, ethnobotanical, geographic, ethnomedical, and linguistic studies.

### **3.3 FOREST THREATS**

#### **THREATS TO FORESTS**

**2.1 THREATS TO FORESTS:** To address the issue of deforestation and loss of biodiversity, the law needs to list and recognise some of the threats leading to deforestation. It is only then that forests can be protected effectively if the threats are well-known and recognised. There is also a need for public awareness programmes in schools and communities, so that they understand the threats and effects of deforestation.

**2.2 FOREST FIRES:** The sanctions that have been put for this crime is a mere one-year sentence or a fine, that is inadequate and insufficient to deter criminals. What is most of concern is that fire is being used by property developers to destroy forests and their services so that they can be rendered ecologically invaluable, and change the forest protection status. Afterwards, they can apply to the government for planning permissions. This is a nefarious action that has been recognised in Mozambique, thus, there is a need to put a heavy sentence and fine on this crime.

- *3.3.1. ILLEGAL LOGGING*

The illegal logging of trees has become a much broader and an international criminal syndicate which involves international gangs and cartels. The law should have been more brute in its approach to illegal logging. It should have set out longer/broader sentences and sanctions to deter criminals on this route and consider that sanctions will only be effective to prevent and deterrent crimes if the judicial institution and administration system are effective and efficient or they will have opposite effects and encourage more jars of wine and envelopes. It is necessary to ensure that the sanctions are sufficiently deterrent, proportional to the damage and socially acceptable.

- *3.3.2. OTHER RELATED CRIMES*

The Law does not consider other illicit activities related illegal logging such as forgery of documents, money laundering, tax evasion and participation to national and international organized crimes. Forest ecosystem destruction, transformation or manufacture of illicit forest products as an important point on the supply chain used to disguise the illicit origin of forest products. The production cost of illegally obtained products are reduced and advantageous for operator who do not respect the law.

- **3.3.3. CORRUPTION**

In Mozambique institutional corruption has been a huge problem that has undermined conservation and protection of natural resources. Corruption is being aided by poor administration by the government and lack of training or resources on the part of forest rangers. Corruption also leads to loggers getting illegal contacts, their contracts being extended and loggers cutting down patches of forest lands not in their contracts. This has continued to aid the rampant over deforestation in Mozambique, as in many African countries. Corruption has captured the state officials and the judiciary. There was a need for this law to recognise this problem, and set higher sentences to deter officials and staff from this crime. The law fails to recognise this issue and has turned a blind-eye on a matter that has besieged forest governance and protection in the global South.

### **3.4 FORESTS AND COMMUNITIES**

- **3.4.1. COMMUNITY OWNERSHIP**

The law does not properly recognise cultural rights, and has set them on a path to collision with the private owners or commercialised loggers. Communities have been living in and around forests for thousands of years. They hunt, gather and collect wood in these forests. Inherently they had developed a sustainable *aproveitamentos* with their leaders and other community members.

- **3.4.2. COMMUNITY INVOLVEMENT**

To enhance the participation of local communities in forest law enforcement it is important to prepare the legal instruments that will define the functions of the community level institutions

created by the new legislation. These institutions could have a central role in organizing and supporting local forest and wildlife law enforcement. They could oversee (i) training and monitoring the work of the *fiscais comunitarios*, (ii) monitoring the payment of fines and ensuring the amount is redistributed among the people involved in detecting the illegal act, and (iii) that tax revenue derived from the exploitation of forest resources is reinvested transparently at local level. It is important for the law to include section 90 and 117 of the Constitution, to capture the essence of public consultation processes. Furthermore, the law should align with the Environmental Act 20 of 1997 which recognises public consultations as a participation process and set an obligation to the Government to create adequate mechanisms to allow public participation on natural resources policies and legislation process and management.

- *3.4.3. PUBLIC CONSULTATION*

The law should have stated clearly what consultation means for the communities and who exactly can participate in forest protection decisions. For much of the actions by loggers, the communities remain the ones mostly affected by environmental degradation. Mozambique experiences seasonal cyclones and forests have been important to reduce landslides and flooding in communities, which has affected poor communities mostly. Thus, the law should have made it clear that these communities will be consulted and able to participate on every discussion on forest protection.

The law did not set out a procedure on how communities were going to be consulted. The consultation of communities is a legislative process that is recognised in Mozambique. There have been several issues concerning when and how communities can be consulted, thus this law needed to clearly state the consultation processes. It is important to note that, some of the consultations were conducted in Portuguese of which some of the communities could not understand or participate in the proceedings. The consultation process serves to hear the communities' concerns and as a public awareness platform for those communities' needing education, information and training on various issues or laws that affect their lives. Thus, the law needs to clearly state this process so that different communities know and understand how they can participate.

Mozambican communities rely on various forest functions, yet their voices and inputs have not been visited. Many indigenous and local communities have spiritual beliefs, cultural practices, and living heritage—protected by the Constitution. Yet there is no indication that the commission has

tried to consult the communities whose lives, livelihoods, culture, and heritage will be most impacted by the policies that flow from this law. There has not been documentation of proper consultation and participation of communities in the process leading to the writing of this law. There is a need for the commission to continuously engage with all communities in Mozambique, with a particular emphasis on communities in rural areas and informal settlements.

- *3.4.4. PUBLIC PARTICIPATION*

The public participation process for this law was flawed in the sense that it did not include the entire forest communities in Mozambique. The participation for many of the small communities was difficult since Portuguese was the only language used. Thus, many of the communities could not participate entirely. In addition, the commentary on the law itself was not properly advertised and insufficient time allocated to comment on this complicated-to-read and lengthy document. The stakeholders that need to be included are small scale forest, tourism, and recreation industry which includes religious and cultural organizations and civil society groups. Although the Environment Bill states an obligation to the Government to create mechanism to ensure an adequate participation of all sector of the society in the policy and legislation making, community, and civil society organization where only called to approve or not the project of law and there were no guarantees that their opinions will be take into consideration. There is a greater need to ensure that all communities are given a chance in effectively participating in the making of the law. Communities should be given reasonable and adequate time, and a platform to effectively participate.

- *3.4.4. ACCESS TO INFORMATION*

The law does not make it clear how information will be shared to the arms of government or communities. In Mozambique every citizen has a right to be informed when a decision is to be taken that affects them. The law did not state any procedure or processes that can be used to access information. Information can be used to monitor companies, logging contracts, and government itself whether they are abiding by the international standards they have ratified.

- *3.4.5. FOREST CONCESSION*

Creation of a forest concession needs to be more defined in terms of whether it's going to be used as an instrument for allocating public forests to a private entity. The public needs to be aware of this and be involved in the process so that they may benefit. Surveys need to be conducted targeting a wide range of stakeholders from the public and private sectors including concessionaires, community organizations, NGO's, civil society organizations, policy makers, private sector bodies involved in forest concessions and alternative allocations models to help identify enabling conditions for effective management of public production forests in Mozambique.

- *3.4.6. PARTNERSHIPS WITH OTHER STAKEHOLDER GROUPS*

To improve the effectiveness of roadside checkpoints, mobile patrols, and field surveys it is important to analyse the possibility to form solid partnerships with other stakeholder groups interested in improving forest and wildlife law compliance. In order to ensure accountability and effective management of the Forestry Promotion Fund, there needs to be an independent accountability mechanism which consists of various stakeholders including civil society organizations and community leaders. This mechanism can be tasked with ensuring that funds are used accordingly.

- *3.4.7. SUPPORTING LEGAL CHARCOAL PRODUCTION*

Improving the effectiveness of roadside checkpoints should surely contribute to controlling the informal trade of charcoal. To reduce its unregulated production, it would be important to adopt instruments that could create incentives (and promote some level of investment) in legal charcoal production. The allocation of concessions specifically for charcoal production could be a valid instrument to consider. The involvement of communities in these new concessions should be a priority.

- *3.4.8. GENDER EQUALITY*

Forests play a huge important role as safety nets for local communities. They collect firewood and fruits from these forests, which helps to reduce poverty and earn an income. They also sell charcoal in the nearby cities and towns. This law does not fully represent and protect women in this small commodity business. It should have provided a route to recognise women organisations and forums that are partaking in gender equality and focusing on youth empowerment programmes. There is a need for this law to also provide a fund for women and provide for programmes that are focused on building capacity and public awareness.

- *3.4.9. INTERGENERATIONAL EQUITY*

The law should have done more to recognise the principle of intergenerational equity. The principle of intergenerational equity states that every generation holds the Earth in common with members of the present generation and with other generations, past and future. This principle is designed to protect natural resource diversity, the quality of the environment, and the ability of future generations to equitably access the benefits therefrom, are translated into the obligations to prevent and mitigate climate change, together with the obligation to provide adaptation assistance.<sup>1</sup> The principle articulates a concept of fairness among generations in the use and conservation of the environment and its natural resources. The principle is the foundation of sustainable development. It has also been applied to cultural resources and to economic and social problems. Thus, there is an intergenerational responsibility to maintain a clean environment, meaning each generation has a responsibility to the next to preserve that environment. Furthermore, the duty also poses the government with certain responsibilities and obligations such as access to adequate and sufficient information, access to quality affordable education, and youth participation and consultation.

#### **4. GENERAL COMMENTS**

- *4.1. SANCTIONS*

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<sup>1</sup> AliceVenn, 'Social justice and climate change', in *Managing Global Warming: An Interface of Technology and Human Issues*, (2019), Pages 711-728.

The prevent effects of the law are not well consider by this law as the reality show that fines only encourage more corruption. To be efficient the prison sentences and fines fixed by the law should be proportional to the damages, sufficient deterrent, socially acceptable and the judicial mechanisms and institutions must be able to impose.

- *4.2. MONITORING AND EVALUATION*

Field monitoring is essential to document the existence and scale of illegal operations, to highlight where enforcement is most needed, and to monitor progress in addressing the problem. Improving the capacity to carry out effective field monitoring activities should be regarded as one of the most important objectives of the new forest law compliance strategy that is being prepared. This should be based on three central elements: adequate training of staff involved in field monitoring; adequate logistic/equipment support (transport, maps, GPS, cameras, etc.); the use of remote-sensing tools such as aerial photographs and different types of satellite imagery.

- *4.3. TRAINING PLAN*

The new forest law compliance strategy should include a specific training plan and roadmap aimed at different stakeholders (tax, timber managers, logging crews, police, judiciary personnel, customs authorities, communities, NGO members, forest professionals, etc.). The possible topics will depend on specific diagnostics, but they should probably include administrative procedures for simple licenses and concessions, forest and wildlife legislation, forest and wildlife crimes, professional ethics, and judicial procedures.

## **5. RECOMMENDATIONS**

- *5.1.* Natural Justice recommends that the Mozambican government - encourage the interaction and collaboration of the different forest owners and strengthen the network of stakeholders involved in forest protection and everyday risk and crisis management. In this way, common protection measures impacting the three components of risk, hazards, vulnerability, and the stakes involved, can be adopted, and applied collectively and

stakeholders will have more weight and be more effective when dealing with public authorities. Furthermore, we recommend that the government encourage the development of forest-sector businesses and activities, get local councilors involved in forest protection, and consolidate and improve perceptions about risk within the whole community (including the public, local councilors, and forest owners).

- 5.2. In addition, Natural Justice recommends the government - adapt and simplify legislation, develop regional decision support tools related to multi-risks for forest owners so that they can integrate risks into their forest management. Importantly, the government should implement a system to assess the efficiency of the protection measures taken. Natural Justice recommends that the Mozambican government develop monitoring tools to raise the alarm and ensure that measures are taken, monitor the development of hazards and adapt the protection methods. In short, the government should make available knowledge and data related to risks to build up a reference data set. The government should also develop risk management training programmes within the educational sector related to forestry.

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