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Article

Climbing the Ladder of Participation: Symbolic or Substantive Representation in Preparing Uganda for REDD+?

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Abstract

The United Nations (UN) and World Bank programme for Reducing Emissions from Deforestation and forest Deforestation (REDD) plus improving forest governance (REDD+) promotes carbon-emission reductions and sustainable forest management. The World Bank and the UN require developing countries to prepare for REDD+ via a consultation process with input from indigenous and forest-dependent peoples. This article focuses on stakeholder consultations carried out under the Ugandan REDD+ preparation process, examining whether these fulfill the conditions necessary for substantive local democratic representation. The article shows that even though REDD+ claims to be democratic and participatory, the Uganda program allows the input of only a few selected stakeholders – mainly the government actors and a limited number of NGOs. Further, despite claiming to be democratic and participatory, the program privileges REDD+'s programmatic goals over democratic procedures. In this context, the REDD+ consultations serve largely to—1) 'educate' the participants to secure their support in implementing the 'technical' aspects of the programme, 2) help the government to legitimise its REDD+ strategy; and 3) speed up the implementation of the REDD+ programme despite the lack of substantive representation.

Keywords: Participation, substantive representation, safeguards, indigenous and forest-dependent people, REDD+, Uganda

INTRODUCTION

The United Nations and World Bank programme for Reducing Emissions from Deforestation and forest Degradation (REDD+) promotes payments for ecosystem services to encourage the storage of atmospheric carbon in developing country forests. However, REDD+ also intends to improve governance through the development of national safeguards to help ensure accountability, participation, transparency and legitimacy in resource governance (UNFCCC 2010; Pham et al. 2014). Countries that are part of the REDD+ programme are encouraged and supported in their efforts to develop social safeguards so that vulnerable groups can access carbon benefits and be protected from undue costs. The United Nations Framework Convention on Climate Change (UNFCCC) promotes 'full and effective' participation of relevant stakeholders, in particular indigenous peoples and local communities as a key safeguard measure for the country-based design and implementation of REDD+ policies and projects (UNFCCC 2010). Similarly, the World Bank's Forest Carbon Partnership Facility (FCPF) and the UN-REDD programme, which provides assistance for national REDD+ strategy development, endorses the 'effective and participatory' stakeholder[1] engagement process. For this purpose, the UN-REDD and FCPF require the governments to apply the principle of Free, Prior and Informed Consent/Consultation (FPIC) in their REDD+ activities (FCPF and UN-REDD 2010).

Policy makers, civil society organisations and theorists also emphasise that the involvement of a wide range of

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actors (including forest-dependent and indigenous people) in fair and non-exclusionary decision making in REDD+ constitute an important criterion for evaluating the success of REDD+ (Corbera and Schroeder 2010; Pham et al. 2014). Yet, they are also concerned that the interests of indigenous[2] and forest-dependent peoples are not taken into account when project designers or implementers make decisions over forests (Corbera and Schroeder 2010; Anderson 2011). Patrick Anderson, a REDD+ policy advisor with the Forest Peoples Organisation[3] describes FPIC as the "establishment of conditions under which people exercise their fundamental right to negotiate the terms of externally imposed policies, programs and activities that directly affect their livelihoods or wellbeing and to give or withhold consent to them" (2011: 15). Anderson (2011) argues that the exclusion of these groups from REDD+ decision-making runs parallel to their lack of political power in policy making in general. Corbera and Schroeder (2010: 5) stress that the involvement of indigenous and forest-dependent peoples in REDD+ decision making can be ensured by a number of institutional design measures. These include—1) being informed of facts and outcomes; 2) being consulted and invited to provide input or feedback; 3) being involved as a partner and ensure that views and concerns are reflected in the outcomes; 4) being invited to collaborate on equal footing; and 5) being empowered and conferred decision-making authority. Arnstein's (1969) influential "Ladder of Citizen Participation" article developed criteria for judging the strength of citizen participation in development projects. For her, the central issue was to assess the degree to which people involved in participation processes could gain enough power to make the target institutions responsive to their aspirations, views and needs. This was the degree to which they had progressed up the ladder from weak consultations toward strong forms of participation such as shared decision making and control of decisions and resources.

The safeguard guidelines adopted by the UN-REDD and the World Bank FCPF emphasise that the national REDD+ policies should meet some minimum requirements to ensure the 'participation' of indigenous and forest-dependent peoples. These include providing room for input from indigenous and forest-dependent peoples in the design of REDD+ projects, and to ensure that the projects are responsive to their needs (UNFCCC 2010; FCPF and UN-REDD 2010). Therefore, in theory, international REDD+ policy discourse supports the view that implementing actors should be responsive to the needs of the communities involved in the programme. This discourse reflects the assumption that national-scale actors 'stand for' forest-dependent and indigenous people's best interests. Ugandan REDD+ policy documents also depict the 'Readiness' process as inclusive and participatory (Republic of Uganda 2011). Hence, both in international and national discourses, representation claims are made to legitimise REDD+'s positive effect on democratic forest governance. These requirements appear to support a democratic form of representation, but they do not establish substantive representation – they remain symbolic gestures.

Pitkin (1967) and Manin et al. (1999), define substantive representation as acting in the interest of the represented in a manner accountable and responsive to them. This article evaluates the extent to which the Ugandan REDD+ Readiness[4] process enables substantive representation of local groups, in particular forest-dependent peoples. With substantive representation, people can demand (via accountability sanctions) to be 1) informed of facts and outcomes; 2) consulted for input and feedback; 3) involved as equal partners and ensured that their views and concerns are attended to; 4) engaged on equal footing; and 5) empowered with substantive decision-making authority.

If national-scale REDD+ processes allow for substantive representation, there will be increased likelihood of the integration of citizens' needs and aspirations and demands into decision-making processes.

In this study, I draw on the choice and recognition framework (following Ribot et al. 2008) to examine the Ugandan REDD+ Preparedness Process (R-PP) from the perspective of different actors and institutions involved, their institutional choices and the effects of such choices on local representation. In particular, I focus on consultations carried out during the preparation of Uganda's R-PP. These institutions and actors, selected to prepare Uganda's R-PP, were also the ones that were invited to participate in consultations. I analyse how higher-level intervening agents (World Bank, Norwegian Embassy, REDD Secretariat and the Ugandan national institutions) promote participation and, the rationales underpinning their institutional choices. Do the chosen institutions substantively represent local needs and aspirations? How likely is the model of participation adopted by donors and national institutions to allow the local people to influence key decisions and outcomes of REDD+?

The study combined methods, including desk analysis of REDD+ documents, face-to-face interviews with key informants, email and telephone interviews with policy makers, and participant observation in high-level policy meetings.[5] It used a 'studying up' approach (Nader 1974) involving participant observation and interviews of the high-level actors organising and implementing R-PP. The R-PP document analysis focused on donors' and government's discourses on representation, participation and on justifications of involvement of local forest-dependent communities in the REDD+ process. When it was not possible to interpret the observations during the meetings, I carried out follow up discussions with participants to help establish structure and effects of these events. The study was conducted in Uganda between January 2012 and June 2013.

The findings show that the existing substantive representation of forest-dependent and indigenous people was overridden in Uganda's R-PP. First, the broad-based 'participation' and inclusion of forest-dependent and indigenous peoples in consultations – that REDD+ financiers require – is lacking in R-PP development. Despite seeking to include indigenous and forest-dependent peoples' representatives, the choice of participants to 'represent' them in the consultation exercises

privileged 'experts' from government and NGOs. Local groups were not included (or represented) in the working group set up to receive and consider inputs for the R-PP. Rather, majority of representatives were from NGOs (61 %), central government ministries (23 %), private companies (10 %) and research institutes (3 %). In addition, a World Bank consultation process (total of 154 participants), touted as highly 'participatory,' was constituted with only 5 % representatives from locally elected leaders (n=7) out of 2372 elected rural councillors in Uganda by 2012 (Republic of Uganda 2011b). The organisers claimed that forest-dependent people were represented by local government district forest and environmental officers (28 %). But, these officers rejected the organisers claims that they were acting as representatives since they viewed the exercise as a training on REDD+ as opposed to a consultation. The majority of the participants in the World Bank consultations (44 %) were from NGOs and government ministries.

Second, rather than being about substantive representation, the R-PP privileged programme goals over democratic procedures. I argue that democratic procedures were performed, rather than practiced, to legitimise and allow the continued implementation of these project goals. As the article illustrates, the R-PP consultations served largely— 1) to 'educate' the participants in REDD+ – particularly on its 'technical' aspects; 2) to legitimise the Ugandan REDD+ strategy in the eyes of the external donors; and 3) to promote and ensure the speedy achievement of the REDD+ programme's objectives – namely, 'efficiency' and effectiveness in preparing the county for REDD+. Further, in this process, the representation of indigenous and forest-dependent peoples remained symbolic, at best. This was a performance of representative processes devoid of substantive content (Pitkin 1967) and whose rhetoric did not match with practice (Edelman 1985).

The next section of this article presents the framework used to analyse the R-PP consultation process and illustrates the links between participation and representation. Section three analyses the national-scale institutions created to carry out the REDD+ process in Uganda and looks at whether the representation rhetoric in the R-PP development process was actualised in practice. Section four discusses the significance of the findings, followed by the conclusion.

VIEWING PARTICIPATION THROUGH REPRESENTATION LENS

International REDD+ policy statements, verbal and written, are replete with language of participation and social safeguards. Representation of the so-called 'stakeholders' and in particular of indigenous and forest-dependent peoples is a key social safeguard principle in REDD+ preparedness (FCPF and UN-REDD 2010). 'Inclusive participation 'or 'broad representation' of stakeholders is used frequently in FCPF, UNFCC and UN-REDD documents (FCPF and UN-REDD 2010; UNFCCC 2010). The World Bank's Learning Group on Participatory Development defines participation as "a process through which stakeholders influence and share control over development initiatives and the decisions and resources which affects them" (World Bank 1996: 3). But, does 'participation' lead to substantive or even democratic representation, particularly of marginalised groups?

The idea that participation should develop and strengthen the capabilities of rural people to intervene more directly in development initiatives is not new (Cooke and Kothari 2001). However, as Pretty (1995: 60) succinctly captures, "participation has been used to build local capacity and self-reliance, but also to justify the extension of state control. It has been used to devolve power and decision-making away from external agencies, but also to justify external decisions." While strong participation means 'partnership and control' (Arnstein 1969); weak participation, or as Pretty calls it, 'manipulative participation,' involves 'informing and consulting.' While some scholars consider the direct involvement of the immediately concerned people in decision-making as a moral right (Pham et al. 2014), in practice, everyone cannot be involved in all aspects of decision making on a day-to-day basis. Hence, some form of representation is necessary (Manin et al. 1999). Representation entails ordinary citizens deferring their everyday participation in their polity's decision-making processes to chosen proxies, who then ordinarily make decisions on their behalf.

According to Pitkin's typology of representation[6] (1967: 213), symbolic representation occurs when "we (the represented) can let ourselves be influenced by emotional ties in spite of our doubts about whether our interests are being served". The downside of this type of representation is that it is open to manipulation by representatives, since it relies on the image of representation presented by the representative in symbols (Pitkin 1967). While Pitkin's definition focuses on normative and interpretive understandings of the symbols by the represented, Murray Edelman's conception of symbolism in political decision-making focuses more on the gap between "political and legal promises" and resource allocations and group reactions" (1985:23). In Edelman's view, organisations driving a process (whether for conservation or development) may pay lip service to inclusion and participation, and even invite representatives of diverse stakeholders to the discussion table. However, if resources and benefits that flow from their initiative ultimately privilege only certain groups, then representation remains symbolic. Edelman's approach to symbolic representation offers a fruitful way to analyse the divergences between intervening agents' promises and practices of participation during the REDD+ R-PP development process in Uganda.

As opposed to symbolic representation, in substantive representation the concerns of the represented are not only voiced by representatives but also incorporated meaningfully into decisions and practice (Pitkin 1967). Manin et al. (1999) argue that substantive representation depends on representatives' responsiveness to the needs and aspirations of the represented and on their downwardly accountability. They define accountability in relation to the ability of the represented to reward or sanction the representatives' actions;

and responsiveness as the ability of the representatives to respond to the needs and aspirations of their people (ibid). Thus, representation is not possible in the absence of a mandate from constituents and institutional accountability mechanisms. In practice however, many actors may lack mechanisms to authorize and hold accountable their representatives – a situation that Houtzager and Lavalle (2009) call 'assumed' representation.

In the context of REDD+, who participates, and what kind of mechanisms of participation are promoted by the donors are important 'institutional choices' (Ribot 2007; Ribot et al. 2008). Governments and development agencies are making institutional choices when they decide how to implement programs like REDD+. The institutional forms and rationales behind such institutional choices are important to understand whether or not the practices carried out in the name of participation (e.g. consultations) aim to establish or could possibly achieve substantive representation. The analysis of institutional choices can help us understand what kinds of representation intervening agents aim for, how and why they promote it.

First, *who* participates in environmental governance projects and programmes? Global environmental programmes such as REDD+ support the view that one of the main objectives of participation is to incorporate 'local' input, particularly from indigenous and marginalised groups. However, experiences from large-scale participation exercises show that who is (or should be) invited as a 'representative' to speak on behalf of communities is often left undefined. In practice, intervening agents (governments, donors, development agencies, environmental groups, outside NGOs, etc.) make choices about who should be recognised as 'representatives'. These may or may not be democratically elected representatives. For example, a study carried out by the Institute of Development Studies (IDS) found that during the development of Poverty Reduction Strategy Papers (PRSPs) in 60 countries globally: "in almost all cases, spaces for participation have excluded significant sections of the population. There is widespread consensus that rural communities were largely omitted, with citizen participation in PRSPs being predominantly urban, middle-class NGOs and CSOs" (IDS 2014: 9). Similar observations have been made for the design process of benefit sharing arrangements in REDD+ and other land based initiatives in Peru and Indonesia (Kowler et al. 2014; Myers et al. 2015). As Ayers (2011: 66) notes "participatory spaces are not neutral: they are created spaces that provide opportunities for agency and inclusion but also exclusion." This study illustrates that while the representatives chosen by donors are included and given opportunities for participation, local forest-dependent people were excluded from the Ugandan REDD+ strategy development on the basis that they lack the 'technical' capacity (also see Faye 2015).

Second, *how* do people participate? Participation in REDD+ processes can range from being informed of decisions and outcomes to being empowered and having influence in decision-making (Corbera and Schroeder 2010). In national-scale policy-making processes, including but in environmental governance, the practice of participation often tends to aggregate the category of 'local', resulting in orchestrated or 'invited' participation techniques (Ayers 2011). Ayers observes that "this form of 'invited participation' often means that those invited are those with access to political assets who are also likely to be among the least vulnerable of any group" (Ayers 2011: 66). Furthermore, it has also been noted those who are invited to take part in large-scale participation exercises experience these "as 'extractive' listening projects, as opposed to ongoing conversations – with people left feeling that their voice has been used for political ends" (IDS 2014: 2). In other words, such participation efforts are oriented towards shaping individuals' views in order to make them part of the intervention. This situation, where individuals and groups have least influence over decisions despite 'participating' in them, is tantamount to subjection (Cooke and Kothari 2001).

Third, *why* is participation promoted in the first place? "Together with other factors such as social and political context, capacities, time and finance, participation rationales guide the choices made in a participatory process" (Wesselink et al. 2011: 5). Therefore, participation rationales are important in shaping the choices about the 'who', 'what' and 'how' of participation and the criteria for success. In their review of the literature on participation, Wesselink et al. (2011) identify three different participation rationales[7] —normative, instrumental and substantive. The normative rationale is based on the assumption that maximum and equal participation is 'good' in its own right and based on democratic ideals. The instrumental rationale is based on the premise that effective participation makes decisions more legitimate and improves results. In the instrumental rationale, "actors are invited because of the contributions [to the outside project] they are thought to be able to make" (Wesselink et al. 2011: 4). In the substantive rationale, participation is aimed at increasing the breadth and depth of information and, thereby serve to improve the democratic quality of decisions.

These different participation rationales are not all equally conducive or result in substantive representation. Normative rationale of participation, as Chandhoke (2009) observes, does not mean that each person's voice will be represented in the final decision. The normative rationale therefore falls short of substantive representation. Instrumental rationale, on the other hand, aims to diffuse conflicts, justify decisions and to limit future challenges to implementation by 'creating ownership.' In the development discourse, this would be equivalent to seeking agreement by presenting a development program or project as if it were the development subject's 'own' idea or initiative. Hence, creating ownership is seen as an instrument for legitimising a project. Unlike normative and instrumental rationales, only substantive rationale of participation creates space for substantive representation. Representatives are seen as capable of, and empowered to change policy goals, according to the concerns and interests of the 'represented' (e.g. the local people). As it will be later illustrated, in Uganda, the 'why' of participation in REDD+ can be best explained by

instrumental rationale. As Mosse has argued for development projects implemented in developing countries, participation has become a legitimate idea due to funders' pressure to incorporate public participation in projects and reform processes. Therefore, participatory exercises are "significantly oriented upwards (or outwards) to legitimise action, to explain, justify, validate higher policy goals or mobilise political support rather than downwards to orient action" (Mosse 2001: 29).

The next section will analyse the intervening agents' institutional choices made during Uganda's R-PP development with regard to who participated, how they participated and the rationales of participation. It seeks to answer three main questions—Does the Ugandan REDD+ readiness process allow downward accountability and responsiveness? What kind of representation did the intervening agents promote during this process? Does REDD+ enable substantive representation of forest dependent and indigenous peoples in a manner that drives decisions to reflect their needs and aspirations?

REDD+ AND INSTITUTIONAL CHOICES IN R-PP DEVELOPMENT IN UGANDA

In 2009, Uganda received a support of $200,000 from the World Bank to help developing its R-PP. The main objective of the funding was to assist the country in laying out and organising the steps needed to achieve REDD+ 'Readiness' (World Bank 2009). For three years (2009-2012), Uganda prepared a proposal for REDD+ preparedness, which included an assessment of the country's land-use, forestry and governance policies (Republic of Uganda 2011a, 2012). These assessments were used to put in place an institutional and legal framework for REDD+ implementation. The UN-REDD and World Bank require input from indigenous and forest-dependent-peoples in the design of REDD+ projects to ensure that the projects are responsive to their needs. For the selection of representatives for the R-PP design, a joint World Bank and UN-REDD guideline on stakeholder engagement states that the consultation process should "include a broad range of relevant stakeholders at the national and local levels to provide for broad representation. Beyond the national level, participatory fora need to be established (or existing ones used) at the local level to ensure active engagement of local stakeholders" (FCPF and UN-REDD 2010: 3). Hence, the intervening agencies (The Bank, Government of Uganda and the Norwegian Embassy in Uganda) incorporated a number of consultations during the R-PP development process. During the creation of national level R-PP institutions, a regional stakeholder consultation was conducted through the support of the World Bank. Later, further extended consultations were carried out, funded by the Norwegian Embassy in Kampala. Since these consultations for Uganda's R-PP claimed to provide room for input from indigenous and forest-dependent peoples in the design of REDD+ projects, and to ensure that the projects are responsive to their needs, they encapsulate a claim of substantive representation. Therefore, analysing the disjuncture between the practice of participation and the rhetoric of participation is important to understand the kind of representation promoted by REDD+ donors in R-PP process.

During the R-PP development, the intervening agencies made three separate but inter-related institutional choices with regard to who would participate and not, how their participation would take place. These choices reflected particular rationales for participation with different outcomes. Table 1 summarises these institutional choices and their rationales of participation according to different stages of R-PP development – which include the World Bank and Norwegian Embassy supported consultations.

Setting up of national level R-PP institutions

To implement REDD+, starting with the R-PP development process, The World Bank chose to work with the National Forestry Authority, a semi-autonomous state corporation charged with managing the country's national forest reserves, hereafter referred as the Authority. The Authority's choice as the REDD+ focal point was contrary to the existing decentralised institutional structure in Uganda, where the Forest Sector Support Department (FSSD) within the Ministry of Water and Environment is mandated with forestry policy formulation. This choice, in effect excluded the democratically elected bodies in the R-PP development. Further, it meant that the initial blueprint of R-PP document was developed without their involvement. A World Bank official involved in Uganda's R-PP observed that the Authority was perhaps the most credible institution in the Ministry of Environment to lead the process at the time; because it was less bureaucratic, had been fairly successful in managing the country's forest reserves and had good technical capacity – a perception confirmed with at least four other respondents.

The World Bank did not recognise FSSD as a leading authority in R-PP[8], arguably due to its lack of the technical capacity, as it was under staffed and under resourced. When the Authority was formed in 2004, most senior forest officials with the former Forestry Department had moved to the Authority due to better remuneration and less bureaucracy which might explain the privileged position that the Forestry Authority enjoyed.

As the focal point, the Authority had the responsibility to constitute and manage the R-PP structures in conjunction with the Bank. The Authority in conjunction with the Bank created three structures to lead different aspects of R-PP development and also become avenues for national level stakeholder consultations on REDD+. They include the REDD Secretariat, Working Group, and the Steering committee. The Authority housed the Secretariat, whose role was to provide 'technical guidance' in the R-PP formulation and to synthesise information from the working group and other consultations into a document that would be submitted to the World Bank. It was made up of two private consultants recommended by The Bank and a REDD+ focal person who was an Authority official. On the one hand, the Secretariat was answerable to the REDD+ Steering Committee under the Ministry of Water and

Table 1
***R-PP Institutional choices*[14]**

R-PP Institutional choices	Who participated	Who was excluded	How they participated	Rationales for participation; influence over outcomes
Setting up R-PP structures REDD+ focal point (FP) REDD working group (RWG) Secretariat (RS) Steering Committee (SC)	FP- National Forest Authority RWG – initially 90% NGOs rest Government ministries; Private sector; research institutions RS- Focal point, three (3) consultants SC- senior representatives of government, NGOs and World Bank	Forest Sector Support Department; local government environment and forest officers; local elected councillors, Local Environmental Committees	RWG technical meetings decided on who would be involved in REDD+ and their roles. FP and RS synthesised reports into a document and submitted to SC SC – approved R-PP document on behalf of Uganda government which was then submitted to World Bank	FP – capacity and efficiency in managing countries protected forests RWG – Experience in implementing climate change projects RS- consultants with experience in forestry policy development and implementation RSC – institutions that had the legitimacy to authorise the R-PP document on behalf of Uganda government Influence – Technical focus and upward accountability to government and Bank fall short of providing conditions for substantive representation
R-PP participation – World Bank regional consultations	'Experts' from central and local governments and NGOs	Forest-dependent people (through their own organisations) and the elected councillors	Expert groups invited to six separate regional consultations; trained on REDD+ and invited to reflect on drivers of deforestation; out of budget of $200000, just over 30,000 used for stakeholder consultations	choice of 'participants' on the basis of 'expert' knowledge – an instrumental rationale; exclusion of local populations on the basis that REDD+ is highly technical; participation served to 'educate' the participants on REDD+; allocation of resources privileged experts; representatives not mandated by forest-dependent people; accountability largely upwards to government and funders
The Norwegian Embassy's extended consultations	10 NGOs contracted to facilitate consultations; 1690 representatives of forest-dependent communities	Elected local representatives; representative mandated by local people	Focus on deforestation and the need how REDD+ would support – suggesting buy in; Very little information on REDD	Agenda for consultations pre-determined – deforestation; Representatives not mandated by locals; no feedback has been given to local participants; general perception that consultation would not influence outcomes

Environment. On the other hand, and perhaps more importantly, the secretariat and other R-PP structures were answerable to the Bank. Clearly, the choice of the Secretariat provided for upward accountability. The Steering Committee consisted of representatives from various government ministries, NGOs, private sector and R-PP donors to provide strategic direction and policy guidance to the R-PP. The Steering committee received and considered the R-PP prepared by the Secretariat before finally approving its submission to The Bank. Like the Secretariat, the Steering committee was answerable to both the Ministry of Water and Environment and the Bank.

Perhaps the most important national level institution with regard to stakeholder participation was the Working group. Its role was to provide input to develop the R-PP and review drafts prepared by consultants. It was initially constituted through a call through the Forest Working Group – a large network of NGOs and private stakeholders working on climate change projects. As a result, the majority (27 out of 30) of the initial members of the REDD+ Working Group were selected from the NGOs. The Authority justified its choice on the basis that this network had organizations that were already working on climate change projects and therefore, had technical 'expertise' that could benefit the REDD+ R-PP formulation. The choice of working group members (NGOs) was primarily an instrumental choice, as the members were selected according to their capacity to support REDD+ programme's 'technical' goals – including assessing the status and drivers of deforestation, sensitising stakeholders and increasing awareness of REDD+ and reconfiguring national structures for REDD+ readiness. Later on, the working group was extended to include 27 officials from ministries and another nine from universities, research institutes and private forest companies.

The 'technical' focus and upward accountability of institutions created for REDD+ policy making (including the R-PP) implied that these new national-scale institutions did not necessarily represent the interests of the forest-dependent and indigenous

peoples. The initial R-PP claimed to have involved a wide range of stakeholders, including forest-dependent populations. However, as I will show later, local government technical officers were invited to 'represent' forest-dependent people, a claim they rejected. Therefore, national REDD+ institutions did not promote substantive representation of the latter. Rather, as I will argue next, the rhetoric of participation, the participants chosen for consultations and the mechanisms of participation indicated that the consultations were based on and promoted symbolic representation.

The Practice of R-PP Participation: The World Bank Regional R-PP consultations, 2010

Although the R-PP development grant agreement between the World Bank and the Government of Uganda (World Bank 2009) required that all consultation should include representatives of all stakeholder groups and specifically focusing on forest-dependent local communities, in practice, invitation and participation appeared to have privileged 'experts' from central government, local government and NGOs.

Between May and June 2010, the Secretariat invited 154 participants to the four regional[9] R-PP consultation meetings (36 participants in the Eastern region, 44 in the central region, 38 in Western and 36 in the North of the country) to represent the following stakeholder groups; central government ministries and agencies (32 %); local government forestry and environmental officers (28 %); NGOs (12 %) ; private company representatives (10 %); local forest-dependent people's representatives (6 %) and even lower were locally elected representatives (5 %). A total of seven locally elected district councillors (average of two per region) were invited out of 2372 elected councillors in the rural districts of Uganda (Republic of Uganda 2011b). According to a senior member of the REDD+ secretariat, participants were selected who were 'best suited' to represent interest groups.[10] For local forest-dependent people, this was often on the basis of experience working with them. As an example, the secretariat selected district forestry and environmental officers to represent forest-dependent people on the basis that they understood the local issues well. This choice therefore invoked an expert and therefore instrumental justification.

However, most of the district staff who were interviewed did not see themselves as representing local people but rather their departments. As one forest officer from Western Uganda exclaimed, 'how can I represent people whose interests I don't know and on a new intervention that I don't know well about?' This excerpt, which is consistent with other interviews, illustrates the difficulty of identifying stakeholders for the consultation meetings. How do you know who would represent the interest of a particular stakeholder group? What is the chance that the individual selected will represent the interests of the stakeholder group they are representing or even aware of their interests? It seems that the REDD+ secretariat is making representation claims in the name of foresters, arguing that they know the 'best interests' of the people. But even the foresters deny this representation claim. Thus, the REDD+ Secretariat's substantive representation claim is flawed.

Clearly, this selection sidestepped two important actors – the forest-dependent people and the elected councillors. Similarly, an external review of Uganda's R-PP for the World Bank noted that: "The participation of different stakeholders consulted during R-PP preparation seems to have failed to reach the key local governments' representatives, the District Forest Services and local opinion leaders who are crucial in decision making at community level. It is not clear how, if at all, their views have been taken into consideration during regional consultations' (FCPF 2011: 6)." The choice of 'participants' on the basis of 'expert' knowledge – an instrumental rationale – was thus inconsistent with the expressed intentions of The Bank which espoused substantive democracy goals.

The practice of sidestepping elected leaders is not new in Uganda. Informal discussions with members of the REDD+ working group confirmed that projects prefer to work with technical officers sometimes without informing the elected leaders. Interviewees identified three reasons for the preference to invite experts to these meetings, despite a commitment to include a wide range of stakeholders, both at the national and local level.

Firstly, that REDD+ was a highly technical process and that local people might not understand. This might explain why the secretariat invited over 80 % of the participants from 'expert' groups. As observed by a Forestry Authority official, "REDD+ is still technical and having many civil society organisation officials, helped take it forward." But even for the majority of district 'experts', the exercise was more of a training as opposed to a consultation on REDD+.

As one environment officer who attended a regional workshop in Central Uganda observed; "Over a half of the time was taken to 'teach' us on what REDD+ is, how it would work and why it was necessary for it to be supported. To ensure we understood, a question and answer session followed the lectures. We were then put into groups and asked to reflect on the drivers of deforestation." Therefore, the meeting was organised in such a way that the focus was on 'drivers of deforestation' rather than addressing the key issue of harm caused to forest-dependent peoples. This shows how the meeting agenda was set before hand to 'train' people on the technical aspects of REDD+, rather than involve their participation. Similarly, local people are framed as being incompetent and therefore need 'experts' to represent them. Nonetheless, most of the participants interviewed were in agreement that the training was necessary before consultation due to what they termed as the 'technical' nature of REDD+.

Second, the timeframe given by The World Bank to develop the R-PP was not sufficient to conduct a comprehensive stakeholder consultation. In that vein, a senior REDD+ secretariat official observed; "We were given three months to produce a draft R-PP report by The Bank … too high expectations which were mechanistic[11]. For example, how can you engage stakeholders countrywide, at policy level, forest-dependent communities and so on, within three months and

still produce a report?" In contrast to The Bank's rhetoric on substantive representation, The Bank's Environment Specialist had suggested that the R-PP be prepared by consultants as part of their strategy to get the R-PP delivered on time. To help speed up the R-PP development, he [the Carbon Specialist] pushed, albeit unsuccessfully to have the focal point moved from the National Forestry Authority to an international NGO in Kampala. This example suggests that The Bank's focus was on the R-PP output as opposed to a process that would be substantively democratic.

Thirdly, it appears that the available funds did not allow comprehensive stakeholder participation. As a senior REDD+ Secretariat official observed, it was impossible to organise comprehensive stakeholder participation from the limited budget provided by The Bank. Out of the US$200,000 provided for R-PP development, US$120,000 was allocated to consultants, while the actual costs of organising the regional workshops was just over US$33,000 representing slightly over a sixth of the total available budget. This shows, that from the beginning, The Bank did not consider stakeholder participation as an important component of the process. Overall, based on the participant pool, the selection process, the structure, the time allocated to the meetings and the budget, it is clear that The World Bank consultation process does not account for substantive representation. Rather, The Bank considered technical reports the most important aspect. The R-PP could not be approved on the basis of this 'exclusive' stakeholder involvement (FCPF 2011). It is on this basis that the Norwegian Embassy in Kampala provided more funds for additional consultations (Norway-Government of Uganda 2010) especially with forest-dependent communities.

The Norwegian Embassy's Extended Consultations: Second Chance to Deliver Substantive Representation

Upon the recognition that the regional consultations described above did not reach key local stakeholders, the Authority successfully applied for funding to extend the consultations to local communities – hence a commitment to substantive representation. Thus, in August 2010, the Norwegian Embassy provided US$183,500 to fund extended consultations to include the interests of forest-dependent people, that is communities within or surrounding the forests (Norway – Government of Uganda 2010). An official with the Embassy said that they expected that this would not be a process where just a few people sit in Kampala and decide on behalf of the people who depend on the forests, and insisted: "REDD+ is about those people and the forests where they live, so its decisions cannot be made without involving them." However, as a condition for the funding, the Norwegian Embassy instructed that the Forestry Authority enter implementation agreements with selected NGOs to carry out countrywide consultations with forest-dependent communities. In total, ten NGOs[12] led by Environmental Alert, a national NGO carried out the extended consultations.

This choice of ten NGOs was, on one hand, based on the Embassy's belief that the NGOs could be more transparent and efficient in the utilisation of the resources but more importantly, they would deliver the outputs on time – an instrumental rationale. On the other hand, and perhaps more important to the Embassy, they could not fund the Forestry Authority directly because of the corruption scandals[13] in the organisation, which led the embassy to cancel an earlier grant agreement with the Forestry Authority. As the Embassy official observed; "When we thought that we were empowering the Authority to deliver on its mandate, individuals within it were enriching themselves. As a result, we closed cooperation with them since 2010 and they have refunded a large proportion of the US$1.6 million which we gave them."

Over 2000 people participated in the nine separate consultation meetings (three each for North and Western Uganda; two for Eastern and one for Central region); 1690 of which were local forest-dependent people. In addition to local government forestry and environment officers, participants were selected from areas with high levels of deforestation, where people are involved with agricultural activities in or around forests and in areas where participating NGOs implement their projects. The selection of participants from deforested areas was not surprising. The objectives of the consultations were to—1) generate information on drivers of deforestation and forest degradation, 2) understand the effects of deforestation and degradation on people's livelihoods, 3) identify ongoing actions to address these effects, and 4) generate strategies to address the effects (Environmental Alert and National Forest Authority 2011).

Indeed, a Secretariat official observed that forest-dependent people needed to understand the costs, benefits and their roles since they interact closely with the resources to address drivers of deforestation. Based on their previous knowledge of these communities, the participating NGOs selected representatives for smallholder farmers, bricklayers, charcoal dealers, timber traders and some local government officials. As one official with Environmental Alert – the coordinating NGO – stated, they invited community leaders who could then share the information with the broad population – an instrumental rationale. This form of 'invited participation' is based on the assumption that representation occurs when representatives, often people who share some form of identity with preconceived categories of actors – commonly called 'stakeholders' – are present in decision making. However, as noted earlier on, aggregating people as stakeholders or 'community' e.g. charcoal dealers, fishermen etc. masks the differences between them and makes it difficult for all their interests to be catered for (see Ayers 2011). Moreover, these 'invited representatives' did not have a mandate from the represented to represent them in the consultations. Nonetheless, I seek to assess whether these invited representatives had a voice during the extended consultations.

This consultation was clearly more comprehensive than the previous one – mobilising large numbers of local representatives

to the table. But like The World Bank consultations, the facilitators 'trained' participants on REDD+ and the role it could play to address drivers of deforestation. As one community representative from Hoima, Western Uganda observed; "They [facilitators] told us that the high level of deforestation was causing harmful effects to the environment and people but there was a new project (REDD+) that could address these problems. They then asked us to make contributions on the drivers of deforestation, effects on our lives and what our roles and expectations could be in the new intervention". An interview with a member of the REDD+ Secretariat which was corroborated with several other interviews confirmed that the consultations gave the participants an opportunity to lay out their expectations — including enhancing greater access to forests and improving the benefit sharing arrangements between state agencies in charge of forests and local people. In Mbale, Eastern Uganda for example, participants were explicit that the new intervention could not be accepted until the long-standing land and forest tenure was resolved. The conflicts between the local forest-dependent people in Mt. Elgon and the government conservation agencies dates back to colonial times in early 1900s but were made worse in March 2002 when the Uganda Wildlife Authority evicted several hundred people from Mount Elgon, many of whom had lived on the land for over 40 years to expand the national park (Lang and Byakola 2006).

Although many participants agreed that the consultations gave them a voice, they were skeptical about the effect the consultations would have on future forest management. As an example, one community leader from Mt Elgon, Eastern Uganda noted, "If the government could not respect a court order to allow the Benet (indigenous community in Mt Elgon) to go back to the forest where they have lived for years, how can they respect these consultations?" In 2005, a high court ordered to reverse the government decision to evict communities from Mt Elgon, but the order had not been followed by the time of writing the article[14]. Similarly, many forest officers were also skeptical. As one officer from Kitgum in Northern Uganda observed; "I doubt if consulting us on forests would change anything…corrupt politicians will continue allocating forests to their friends." Interestingly, while the meeting was organised as a consultation on REDD+, little was mentioned about it beyond the introduction. As a Secretariat official noted, REDD+ idea was complex and they had to find a simple way of communicating it – hence the focus on deforestation. In Peru, Kowler et al. (2014) found that most project proponents withheld information from local populations to avoid generating false expectations or confusion about REDD+, given its complex and abstract nature. However, as Kowler and her colleagues argue, withholding information threatens the legitimacy of future REDD+ arrangements.

While these consultations provided a chance for a large number of forest-dependent people to be included in the discussions, the process did not provide conditions for substantive representation. Although initially the Norwegian Embassy had the idea of inviting local forest-dependent peoples so that their interests could be represented – suggesting a substantive rationale, the way in which 'representatives' were selected showed an instrumental rationale. The facilitating NGOs chose to aggregate communities into groups based on livelihoods, potentially masking differences within groups and, inviting community leaders in different sectors who would be the least vulnerable among local people. Further, the criteria of selection of participants and the objectives of the Norwegian Embassy consultations show that main objective of involving the forest-dependent peoples in future REDD+ strategy development was to 'sensitise' them to reduce their role in deforestation (Republic of Uganda 2011a, 2012). Hence, their participation was framed by a pre-determined agenda. As Cooke and Kothari (2001) argue, participation whose agenda is determined elsewhere only serves to co-opt the participants with little influence on decisions made.

Finally, representation lacked downward accountability mechanisms. For example, forest-dependent peoples had not expressly mandated these 'representatives,' who did not provide them either with feedback on the outcomes of the consultations. This is despite the World Bank outlining that those consulted should be provided with feedback, not least being informed on how the output of consultations have been taken into account (World Bank 2009). However, the Consultation reports were submitted to the Forestry Authority, the Norwegian Embassy and subsequently to the World Bank - suggesting clear upward accountabilities. The implicit demands put by donors lead the projects to focus on outputs (such as consultation reports) as opposed to democratic procedures. As a member of the REDD+ secretariat noted, the incentive to focus on outputs might be because donors assess the success of processes through outputs. Moreover, as the reliance on external review for R-PP shows, the consultation process was carried out by actors who were not accountable to local people.

DISCUSSION

REDD+ and other forest carbon programmes are often depicted as and claim to be aiming for a more 'inclusive' and 'comprehensive' participation of forest-dependent communities. The participation of a 'broad range' of stakeholders – which includes, but is not limited to forest dependent and indigenous peoples is considered sufficient criteria for democratic representation. The paper sought to investigate the institutional choices made by intervening agents in Uganda's REDD+ R-PP development, by asking who was chosen to participate in consultations processes, what form of participation was promoted and enabled and if these choices are likely to deliver substantive representation. The findings show that despite its democratic and inclusive claims, Ugandan REDD+ program privileged to work with government officials and with 'experts', primarily with the NGOs and consultants. In consultations funded and supported by the donors (the World Bank and the Norwegian Embassy), government actors constituted the majority of the participants, and were understood as responsible for the enforcement and

the implementation of the REDD+ safeguards. The NGOs and the experts were also privileged for their superior technical expertise and capability to carry out in speedy fashion the programme's outcomes.

The intervening agents' institutional choices in the selection of participants as well as their choices with regards to the processes of participation effectively excluded indigenous peoples and elected authorities. Hence, during this process, the institutions that are not subject to downward accountability and are not responsive towards forest dependent and indigenous community groups were recognised as their representatives. This gap between the expressed goals of the programme and the lack of substantive participation rationales and practices show that symbolic representation was privileged over substantive democratic representation.

During the REDD+ R-PP consultation process, the intervening agents justified their choice of 'participants' and participatory methods through the 'stakeholder' discourse. To identify the appropriate local 'stakeholder' groups and their 'representatives' to be invited to participate in R-PP consultations, the intervening agents stratified the communities according to geographical zones or according to their perceived interests (e.g. charcoal dealers, fishermen etc.). Only individuals or institutions that were perceived to be representative of these aggregate groups were recognised as representatives. This notion of representation concealed the power relations within communities and further masked biases in interests and needs. Similarly, the NGOs constituted one of the main 'stakeholders' who were invited, as representatives in the meetings. Formal institutional mechanisms are both necessary and desirable to ensure that the claims of representation, particularly by NGOs, have meaning (Ribot 2004; Houtzager and Lavalle 2009). In Ugandan consultations, despite their claims of representation, none of the 'participating' NGOs had been authorised by the local people to represent them. Through institutional choices of intervening agents, the NGOs representation claims were validated, while substantively representative authorities – like elected local governments were ignored. While some district officials attended the meetings, they did not appear to have any influence on the process. As Mosse's (2001) argued, participation is neither binding nor indicative of representativeness, hence increased participation of 'stakeholders' do necessarily result in democratic outcomes.

Mosse (2001: 25) also points out that "donor demands for participation produce a characteristic dual logic". One logic emphasises participation, capacity building and sustainable development and the other logic emphasises upward accountability and delivery of programmes. In the case of REDD+ R-PP consultations, the Ugandan rhetoric on participation seems also reflect a dual rationale. The first one follows the intervening agents' discourse on ownership of the R-PP - an instrumental rationale. The second one, premised on the fact that 'inclusive' participation would safeguard local and indigenous peoples' interests seems to follow a substantive rationale. However, a closer analysis of donors' institutional choices shows that the emphasis on participation – Mosse's first logic –is also based on an instrumental rationale supported and justified by arguments related to expertise and efficiency.

The findings also show that technical justifications were central in disguising the instrumental rationale underpinning donors' institutional choices. The choice of the Forestry Authority was supported by the argument that the Forest Authority had a better technical capacity to lead the R-PP development, as opposed to the legally mandated Forest Sector Support Department. The technical justification that REDD+ requires the use of experts and organisations with technical expertise, was not only used as criteria for joining the REDD+ working group. It was also instrumental to exclude other stakeholders, such as forest dependent and indigenous communities and local governments. The elected local authorities were largely denied recognition in R-PP development, for their assumed lack of technical capacity. Both elected local governments and forest dependent indigenous peoples are framed as lacking the ability to understand the technical details involved in REDD+ and, therefore, in need of experts to mediate their interests (see also Faye 2015). When local actors are involved, they do so to either validate pre-determined plans and policies, or are unlikely to have influence in decisions made. The 'experts' wield a lot of power and influence over decision-making processes, and their presence effectively de-politicises highly political processes (Ayers 2011).

The second set of justifications focused on efficiency and delivery of outputs. The Authority's selection was also justified on the basis that it would be less bureaucratic and efficient in the delivery of outputs. For this, The World Bank preferred a small number of experts to work with the Forestry Authority to deliver the R-PP within the three-month timeline they had set. Similarly, elected local governments were excluded because they would 'slow down' or 'politicise' the R-PP development. On the other hand, the Norwegian Embassy, which claimed that the Authority was inefficient, corrupt and unlikely to deliver the expected outputs, chose a group of NGOs to conduct extended consultations instead of elected local governments or representatives mandated by indigenous and forest dependent peoples. This confirms also what Ribot et al. (2008) have argued, the intervening agents often chose the NGOs or private actors to avoid the slow and, often messy, decision-making process associated with elected authorities. However, it also points to the importance of the 'instrumental participation' rationale that underlies the Ugandan REDD+ R-PP consultation process. Efficiency, associated with the speediness of reaching programme's outcomes, was not only a justification but also part of an instrumental rationality of the intervening agents. The incorporation of local actors to validate outputs that had been developed by experts suggests also such instrumental rationale. This view seeks to shape individuals' opinions in order to make them part of the intervention and accounts to their subjection (Cooke and Kothari 2001). Hence, participation became an important part of repertoires of domination at work in the consultations surrounding Uganda's REDD+ R-PP process (see Poteete and Ribot 2011).

The tendency to sacrifice substantive participation of local actors in favour of efficiency and quick delivery of outputs points to the fact that the intervening agents' choices, guided by instrumental rationality, can compete with and override the goal of establishing critical safeguards necessary to secure vulnerable groups. Unless participatory processes take into account the relative bargaining power of the so-called stakeholders, they merely provide opportunities for the more powerful (Cooke and Kothari 2001). The REDD+'s equity outcomes, its legitimacy and viability will not only be shaped by participation in the broad sense (Anderson and Zeriffi 2012), but on participation that reflects a substantive rationale.

As this article shows, delivering substantive democratic representation is more difficult than intervening agents suggest. Their expressed intentions suggest that comprehensive stakeholder participation is assumed to be enough to safeguard local people's interests. The study highlights two key challenges with this assumption. First, stakeholder participation skews the resource allocation and impedes the substantive representation. Processes that are likely to translate expressed democracy intentions into actions require huge resources that are unlikely to be available in the short or medium term. As shown in the paper, both material resources and time provided to develop the R-PP presented challenges to the REDD+ authorities to organise stakeholder consultation that would be substantively democratic. This allocation of material resources clearly privileged experts, the effect of which was symbolic representation (see Edelman 1985). Nevertheless, intervening agencies should strive to ensure that commitments to safeguard the interests of forest-dependent people are matched with resources and benefits that flow from these initiatives do not simply privilege experts over locals. Second, as long as the so-called stakeholders who are interested parties – including rich outsiders interested in forest wealth, programs like REDD+ having vested interest in achieving speedy outcomes, and development agents favoring long-term national development interests over current needs of the forest dependent peoples – are assumed to be simple 'citizens' the 'stakeholder' form of participation will remain a formula for merely giving leeway to those who have something and thus have something to lose or gain. These would, unfortunately, often be the rich or the outsiders who have stakes in extra-local agendas. The local stakeholders in a democracy are *the* stakeholders. In democratic representation, the democratic authorities represent citizens; they do not have to take into account or defer to outsiders – rich or poor. They are accountable to the people and if the local people's forests are at stake, then they are the stake holders and their representatives should be able to represent them – including their ability to say 'yes' or 'no' to any programme that claims to be soliciting their substantive participation. The term 'stakeholder' remains highly problematic in these kinds of interventions and participation processes. It allows enormous discretion on the part of intervening agents to decide who holds which stakes and to admit into the process those who are likely to have stakes in the success of their projects (see also Ribot 2004). This is not substantive representation and it is not democracy.

CONCLUSION

Substantive representation in the REDD+ Preparedness Processes holds the promise of safeguarding the interests of local forest-dependent populations and therefore determining the equity, legitimacy and viability of REDD+ projects when they are finally implemented. Despite expressed intentions of choosing representatives that would be 'all inclusive' in R-PP, the choices of institutions or actors to represent their interests largely focused on 'expertise' (e.g. prior experience in climate change), efficiency (e.g. ability to complete the process within the three-month timeline set by The World Bank), and maintenance of domination (e.g. use of local people to validate pre-determined agendas). The effect of these choices is that locally elected authorities and generally institutions that are subject to citizen control are excluded in favour of experts from either NGO, national or local government. The paper highlights the dilemma of representation claims being implemented through experts. First, representation through experts lacks widely accepted mechanisms of voice and accountability by which the represented can authorise representation or ensure responsiveness. Experts should inform processes; not dominate them. Second, framing REDD+ as 'highly technical', as if that justifies overriding democratic process, allows intervening agents and project implementers to depoliticise implementation. Implementation is fundamentally political; to be equitable and just it must be fundamentally democratic.

Consequently, substantive democracy is trumped in Uganda's REDD+ R-PP by a focus on instrumental outcomes of REDD+. In practice, democratic procedures are put in place for show – producing a kind of symbolic representation that legitimates projects allowing the continued implementation of its project goals. The emphasis on delivery of project outputs, coupled with widespread perception by participants in consultation exercises that they could not influence the outcome, meant that the participatory processes were accountable upwards and performed merely to legitimise the R-PP outputs. So, who is climbing up the ladder of participation? It does not appear to be the forest-dependent people. It appears that it is a ladder to get projects from conception to implementation with the least resistance. It is not a ladder for popular emancipation. It is a ladder for stepping over the inconvenience of inclusion – for eliminating politics from what should be a fundamentally political process. Operationalising substantive representation would require a system that seeks to challenge existing power relations rather than working around them. Negotiation or claiming of REDD+ rights must therefore begin through a system where relations between the state, intervening agents and forest users is mediated by democratic – distinctly political – processes and institutions.

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NOTES

1. A joint UN-REDD and FCPF report (2010) define stakeholders as groups that have a stake or interest in the forest and those that will be affected by REDD+ activities.
2. The use of the identity 'indigenous' is contentious. Although the R-PP referred only the Batwa and Benet as indigenous, the Uganda constitution (1995) describes all groups of people that were in the country by 1902 as indigenous. A REDD+ stakeholder workshop in Kampala in February 2012 agreed on using the connotation Forest-dependent Communities (FDC) instead.
3. Details available at: http://www.forestpeoples.org/background/staff-and-board. Accessed on 28 June, 2017.
4. REDD+ Preparation proposal (R-PP) is a process of laying out and organising the steps needed to achieve 'Readiness' to undertake activities to reduce emissions from deforestation and forest degradation (REDD+)
5. The study involved 47 face-to face interviews, 25 e-mail and telephone interviews. In addition, it is based on observations of 16 high-level policy meetings.
6. Pitkin defines three categories of representation—1) descriptive representation, which is 'standing for' or making present of something absent. In descriptive representation, representatives 'stand for' values and commitment to the represented. 2) symbolic representation is an aspect of descriptive representation with emotional ties but is devoid of substantive content; 3) substantive representation is acting in another's best interests and giving them a stake in the action itself. In this article, I limit myself to symbolic and substantive representation, which is the focus of this study.
7. Wesselink et al. 2011 have identified the fourth rationale which they call 'legalistic rationale' where participation is only organised to meet formal requirements. However, I do not find it significantly different from the instrumental rationale.
8. In early 2013, however, the Forest Sector Support Department was recognised to lead future phases of REDD+, justified by a bank official as a better institution (an instrumental rationale) on the basis that it was; "well placed to bring all state actors into supporting the R-PP".
9. Uganda is sub-divided into four administrative units called regions which are further subdivided into districts – a total of 112 by 2012 (Western- 26; Northern- 30; Central-24 and Eastern- 32).
10. Interest groups or stakeholders identified for the regional consultations included central government officials, NGOs, local forest-dependent people, private forest companies, district technical officers, locally elected officials and cultural groups (specifically cultural kingdoms such as Buganda). (See Republic of Uganda 2011).
11. 'Mechanistic' Referred to impractical and inflexible expectations on the part of the Bank.
12. They included: Environmental Alert, IUCN, CARE-Uganda, Water Governance Institute, Tree Talk, ECOTRUST, NAPE, IPAC/TABORA, CODECA and ACODE. IUCN and CARE are international NGOs while the rest are national NGOs.
13. It was reported in two of Uganda's leading daily newspapers in February 2012 that the Authority's Executive Director had allegedly defrauded the organisation with an equivalent of US$ 346,000. The issue was still pending in the High Court by the time of writing this article.
14. See Lang and Byakola, 2006 for details.

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