

Category B: Public Participation in Project-Level Decision-Making

Introduction

Rationales of the Indicators

We can consider and analyze indicators on public, or people, participation at many levels, i.e., at the policy-making level, at the level of laws covering the subject of participation, and at the project level. Each level is connected with the other. At the project level, indicators on participation help us to analyze whether in the process by which policy is transformed into practice, any room or opening was provided for the people to get involved in. This is especially significant in projects that were developed with the aim of improving the quality of life and of occupation of the people. The development of the indicators is thus similar to developing a monitoring tool to check on how far practice deviates from the theory is, and what progress has been made with respect to building up transparency in various processes.

For Category B the researcher has chosen two case studies to assess the extent of public participation, using the indicators. The cases are:

1. Seafood Bank Project
2. Lancang-Mekong Navigation Channel Improvement Project

Case Study: Seafood Bank Project

Introduction

General Situation

The Seafood Bank Project, or the national project to develop a strong seafood production base, has its origins in a Thai cabinet resolution on asset securitization dated 24 January 2004. Subsequent to that resolution, the Office of Asset Securitization conceived the project as a work plan in the asset securitization programme for the year 2004. The project comprises of measures specifically related to coastal areas where seafood farming or marine aquaculture is practiced, such areas having been described as "coastal areas where permission has been given to engage in seafood farming that is non-detrimental to the environment and that documents confirming this should have been issued to seafood farmers earning a living in the area. In these areas, there should have been in place proper management of aquaculture especially with respect to hygienic conditions of farming and a proper handling of the environment so as to form a solid basis for securitization."

The core government agency responsible for the Seafood Bank Project is the Department of Fisheries, which developed the project based on the idea of asset securitization and solving the problem of deterioration of fishing areas and the subsequent decrease in fishery production. The long term goal is to develop a strong base for the future production of seafood, in place of the traditional fishing methods. The marine resources of Thailand are considerable and coastal seafood farming would be an important part in achieving this goal. Thailand has, for example, a seawater area of 420,280 square kilometers or 262.68 million rai of which approximately 210.62 square kilometers or 130,106 rai are coastal waters that already are fished for seafood, such as mussels, oysters, and brackish water fish. The Thai Department of Fisheries has estimated that approximately 249.92 square kilometers or 154,386 rai of coastal waters with potential for seafood farming are still available for fish farming (Department of Fisheries, 2004; Torn Thamrongnavaswasdi, 2004).

The encouragement and promotion of seafood coastal farming coupled with the asset securitization project could also be used to improve the management of coastal areas. The plan is to issue seafood farming rights documents or permits for utilizing the 460.53 square kilometers or 284,492 rai that are available to three target groups: first, those who have registered as being poor and would like to engage in seafood farming but presently do not have access to an area to do this; second, those who already engaged in such farming; and third, those who are interested in seafood farming in general. The farming is to be governed by the rules and regulations of the Department of Fisheries which has set up a system of contract farming, to encourage seafood farming to progress to a limited liability company concept. This system has been implemented since 2004 in coastal areas of 22 provinces that the Department has undertaken surveys. These provinces are located in both eastern and southern parts of the country.

On progress in implementation of the above concept so far, it was found that permits for fishing, or what are called "water deeds", have been issued for the first time under the heading of "the Securitization Project to Alleviate Poverty (seafood bank)" to farmers in Jeh Bi Leng Sub-District, Muang District, Satun Province. Furthermore, the first group of 28 farmers who were interested in fish farming has

been given an opportunity to access capital funds. (The Manager Daily, 13 December 2004; Office of Securitization 2004).

Case Selection

Thailand has decided to delegate the management and administration of natural resources to separate government agencies, according to type of resources and the need for conservation. The result is that work plans or projects dealing with the quality of life of the people have been separated administratively from work on natural resources, even though both themes are intertwined in that they derive from the same raw material base, i.e., natural resources. This separation of work tasks has resulted in the Seafood Bank Project being excluded from the network of natural resources management, and instead categorized as being under work programmes for the development of quality of life and for solving poverty. In reality, this project is very much related to the utilization of coastal resources of Thailand, because it is aimed at implementation in every province that has a coastline. It would have much impact on people living in the area and other related entities. It should also be noted that the project does not aim specifically at managing natural resources, and is therefore under the administrative responsibility of the Department of Fisheries. This department's major task is to encourage people to make best use of marine coastal resources, while its role in conserving and rehabilitation of the environment is less obvious. The result is that the Seafood Bank Project is categorized as not having to undergo an environmental impact assessment (EIA).

But if one considers it in detail, the project is very much related to the utilization of coastal resources and to people who use it. Seafood farming activities there are aimed at large-scale production, yet no details are given on its environmental impact, and its possible effect on communities. Thus, it is very appropriate to study this case focusing on the extent of public participation in project-level decisions, even though it does not fall under the category of projects necessitating an EIA. The study will help the public and the agencies to understand that for any decision concerning natural resources an environmental impact assessment must be done, to gain a more complete picture of the project. In the end, any project utilizing a natural resource will effect the total resources management situation, and if the resource is not made use of correctly by the project, the end result could be a huge loss of the remaining resources.

It is therefore extremely necessary to create a single rule to be applied in planning all projects that utilize natural resources: that they must undergo environmental, social and economic assessments, irrespective of whether they are projects aimed at natural resources management or whether they are aimed at improving the people's quality of life. The key dimension to be assessed is resource utilization in relation to the environment. Such single rule or standard will facilitate a common analysis and evaluation.

Assessment Method

Assessment was done by focusing on the agency directly responsible, i.e., the Department of Fisheries, on other agencies involved in studies of the topic, and on stakeholders such as people residing in the area of the project. Various assessment methods were used, in order to gain accurate and complete information and data. The following points describe the methods:

1. Assessment utilizing documents. An example of materials used is the report "The Seafood Bank and Solving Poverty", based on two forums organized by the Thai Human Rights Commission, one on 20-21 July 2004 in Haad Yai Province and the other on 27-28 September 2004 at the Royal River Hotel in Bangkok.
2. Assessment from electronic documents. This involved searching for information in websites of responsible agencies such as <http://cftp.th.com/seafoodbank/>, as well as other websites that provided details on the project in terms of news as well as its progress.
3. Assessment from interview data. Interviews were divided into two parts. One, interviews with project staff. Two, interviews with representatives of residents of the area of the intended project.
4. Assessment from letters from the field staff doing the assessment. These are letters requesting details on some aspects of the project, to help them make a better assessment, prior to forming their conclusions and analysis.

The information gained will then be assessed according to the indicators specified, and a conclusion drawn up for the case study.

Table of Indicators

Indicators	
III.B.1 Lead time for notification of draft project documents*	
Values	Explanation and Justification
(0) Not applicable/not assessed	<p>From the study it was found that the Seafood Bank Project was approved by the cabinet on 24 January 2004, under the policy framework of securitization. But before the submission of the project proposal to the cabinet and after its approval, no detailed information was provided to the public.</p> <p>Searching the websites of newspapers and other media also failed to uncover any news on it. Community leaders in the areas of the intended project said in interviews that no Department of Fisheries agencies had given any information to the community or to other relevant people.</p>
(i) <u>No public notification of the selected draft policy, strategy, plan, program, or legislation was issued</u>	
(ii) Public notification of the selected draft policy, strategy, plan, program, or legislation was issued with minimum lead time (please specify)	
(iii) Public notification of the selected draft policy, strategy, plan, program, or legislation was issued with reasonable lead time (please specify)	
III.B.2 Quality of information supporting participation in project-level decision-making*	
Values	Explanation and Justification
(0) Not applicable/not assessed	<p>This project, as mentioned above, was conceived under the securitization policy, the latter being part of the government's urgent priority plan to solve the problem of poverty. Thus, when the project was submitted to the government for consideration, no research or studies were used.</p> <p>The decision to go ahead was made on the assumption that the Seafood Bank Project will improve access to natural resources and maximize the productive capacity of coastal areas, given the fact that there were already people doing approved seafood farming in the area.</p>
(i) <u>No relevant information was provided to the public</u>	
(ii) Information provided to the public included one to three "elements of quality" ³⁴ (please specify)	
(iii) Information provided to the public included four or more "elements of quality" (please specify)	

³⁴ "Elements of quality" include:

1. Explanation of the background of the policy, strategy, plan, program, or legislation;
2. Description of options and their implications for the environment;
3. Complete text of the draft decision or the envisaged procedure (commencement, opportunities to participate, time and venue of any envisaged public hearing, etc.);
4. Information on when, where, and how further information will be available;
5. Information on when and how members of the public can submit comments or questions;
6. Information on what kind of environmental information is available, etc.

	Also, it was thought that the project would give opportunity to wider range of people who might be interested in such farming to access natural resources. Another assumption made was that seafood farming would lead to increased total production, which will lead to more sales, more income, and a higher profile for Thai seafood products.
III.B.3 Existence and availability of local permits and other project documents (e.g. concessionary agreements, contracts) at public registries/records*	
Values	Explanation and Justification
<p>(0) <u>Not applicable/not assessed</u></p> <p>(i) No registry or record of local permits and/or other project documents (e.g., concessionary agreements or contracts) is accessible at any public location</p> <p>(ii) Registries or records of local permits and/or other project documents are accessible in one public location (please specify)</p> <p>(iii) Registries or records of local permits and/or other project documents are accessible in more than one public location (please specify)</p>	<p>This is because the Seafood Bank Project is overseen as part of government policy and is a project deemed as not having to undergo an environmental impact assessment. Moreover, the project does not involve giving concessions to the private sector to implement a project in an area, but rather is a promotion programme of a state agency. Hence, not required to do an EIA.</p>

III.B.4 Degree of external consultation in defining the parameters or scope of the project*	
Values	Explanation and Justification
<p>(0) Not applicable/not assessed</p> <p>(i) No independent experts or organizations were consulted about project parameters and scope</p> <p>(ii) <u>One or two independent experts or organizations were consulted about project parameters and scope</u></p> <p>(iii) Three or more independent experts or organizations were consulted about project parameters and scope</p>	<p>From a letter of inquiry sent to the Department of Fisheries on 21 February 2005, and from questions directed to Mr. Supakitti Saikrachang (Fisheries Researcher level 7) on 15 March 2005, it was found that the Department of Fisheries in cooperation with the Department of Hydrology, Royal Thai Navy, had drawn up a base map for the project. The process was assisted by the provision of data from related agencies, namely, The Department of Marine and Coastal Resources, the Department of Water Transport and Commercial Shipping,(both under the Communications Ministry), and the Tourist Authority of Thailand.</p> <p>The current project phase is one of making preparations to commission Kasetsart University to survey the areas of intended project implementation in order to draw up a chart and set up a digital system for a 1:4000 scale map. The map is to be used in preparing the areas for fish farming and will follow one standard, for ease of monitoring and verification, and for avoiding any conflict that may arise from competing usages of the area. It is to be noted that in this single instance of map preparation, no consultation was made with experts in other fields such as environment, science, and society on the project as a whole. Only requests were made, for information to prepare the maps.</p>

III.B.5 Consultations on project-level decisions held with populations potentially affected by proposed project *	
Values	Explanation and Justification
<p>(0) Not applicable/not assessed</p> <p>(i) <u>No consultations were held with potentially affected parties or populations</u></p> <p>(ii) At least one consultation was held with potentially affected parties or populations</p> <p>(iii) Planned and systematic efforts were made to consult potentially affected parties or populations (such as providing opportunities for written comments – please specify)</p>	<p>From questions directed to the Department of Fisheries on 21 February 2005 about consultation with people living in the areas of the intended project, it was found that the Department had not organized a public forum for the people who would be directly affected by the project.</p> <p>However, the Department did participate by invitation in a forum on the seafood bank organized by the Subcommittee on Marine and Coastal Resources and by the Human Rights Commission during 20-21 July 2004 in Haad Yai District, Songkla Province, and during 27-28 September 2004 at the Royal River Hotel in Bangkok.</p> <p>There, representatives from the Department responsible for the project presented information and data to villagers and took note of their opinions and suggestions. The Department also considered a report by the Sustainable Development Foundation on the experience of using public land in coastal areas for farming in Surat Thani and Pattani provinces. But from a search of the Seafood Bank Project website, i.e., http://www.cffp.th.com/seafoodbank/ and questioning of officials, it was found that there had been no dissemination of information or documents concerning any consultations made with people expected to be directly affected by the project.</p>

III.B.6 Timeliness of notification of intent to approve project-level development activity	
Values	Explanation and Justification
<p>(0) Not applicable/not assessed</p> <p>(i) <u>No public notification of the intent to approve the selected project-level development activity was issued</u></p> <p>(ii) Public notification of the intent to approve the selected project-level development activity was issued with minimum lead time (please specify)</p> <p>(iii) Public notification of the intent to approve the selected project-level development activity was issued with reasonable lead time (please specify)</p>	<p>From a search of websites of the Department of Fisheries, other related sites, and newspaper archives, no documents or statements were found that contained an invitation for the people to participate in project development activities.</p> <p>From interviews with local leaders, researchers could not find any letters sent to villagers expected to be affected, nor were villagers aware of any notice asking the public to send in their opinions to the relevant agencies. Local fishermen and coastal farming groups attending the 20-21 July 2004 forum organized by the National Commission on Human Rights reported that they first heard of the project at this forum.</p>
II.B.7 Timeliness of communication of final project decision	
Values	Explanation and Justification
<p>(0) Not applicable/not assessed</p> <p>(i) <u>No public communication of the final project-level decision was issued in the selected case</u></p> <p>(ii) The final project-level decision was publicly communicated 3 or more months after adoption (specify when)</p> <p>(iii) The final project-level decision was publicly communicated within 3 months of adoption (specify when)</p> <p>(iv) The final project-level decision was publicly communicated within 1 month of adoption (specify when)</p>	<p>From a search of websites and newspaper archives, no documents or statements were found that referred to a period of time allotted for the public to consider the project after it was approved.</p> <p>From interviews with community leaders in project areas in Trang, Pattani, and Surat Thani provinces, there does not appear to be any letters sent out to villagers who were likely to be affected, nor was there any information conveyed to the public, on the results of the decision made.</p>

III.B.8 Communication tools used to disseminate information about project-level intentions, drafts or decisions	
Values	Explanation and Justification
<p>(0) Not applicable/not assessed</p> <p>(i) The public was not notified about the project-level intentions, drafts, or decisions</p> <p>(ii) Only one communication tool was used to notify the public (please specify)</p> <p>(iii) <u>The public was notified through the use of several communication tools (please specify)</u></p>	<p>This indicator aims at assessing implementation after the cabinet resolution of 24 January 2004 approving the project. In response to questions asked on the issue of communication of information on the Seafood Bank Project to the public, the Fisheries Department indicated that there was such communication by:</p> <ol style="list-style-type: none"> 1) Television programmes aired on Channel 5, titled "Safe Sources of Seafood Production", a total of 16 parts, 5 minutes each, shown on Thursdays and Fridays. Content consisted of knowledge on producing food safely under the Food Safety with High Standards Policy. But the production source and process was not stated clearly 2) Organizing a press conference on the Safe Seafood Production Sources Project, designed to support the Seafood Bank Project. This was done on 1 November 2004 at the Payoon Meeting Room, Department of Fisheries, presided over by Assistant Minister of Agriculture and Cooperatives, Mr. Newin Chidchob. The meeting consisted of a discussion on background to the projects, aims, steps in implementation, progress so far and expected project results, as well as a question and answer session with the press. 3) Posting information on www.cffp.th.com/seafoodbank/ which is run by the Center for Food Safety on Fishery Products. 4) Publishing a document titled Seafood Bank Project, distributed to the interested public. The above website and the document describe the project background, basic principles and method of project implementation, when the project began, and intended areas of the project. But the delineation of project areas in each province did not specify which coastal strip the project will be implemented first and when. Another point is that the website is undergoing improvement, so the information is not up to date, even though permits have been issued for seafood

	<p>farming in some provinces such as Satun. And the idea of dissemination via website is of limited use to the majority of the target groups, who are mainly villagers with limited competency on online searching. Such information then is accessible only to those with capacity and competency in internet searching.</p>
III.B.9 Communication of information about draft project-level decisions to marginalized socioeconomic or cultural groups	
Values	Explanation and Justification
<p>(0) Not applicable/not assessed</p> <p>(i) <u>No documents, audio-visual materials, or meetings were targeted at marginalized socioeconomic or cultural groups</u></p> <p>(ii) At least one document, audio-visual material, or meeting was targeted at marginalized socioeconomic or cultural groups</p> <p>(iii) Planned and systematic efforts were made to target documents, audio-visual materials, or meetings at marginalized socioeconomic or cultural groups</p>	<p>From questions directed to the Fisheries Department, we were informed that responsibility for the communication of information to the target groups in project areas is assigned to provincial offices of the Department. They are tasked with publicizing the project to those who have registered as being poor with the Ministry of Interior; those who were already fish farming; and other interested people. But no printed material or media programming specifically directed to these groups were prepared.</p> <p>However, the target group currently specified by the Fisheries Department does not include other marine fishery groups, such as local fishermen, medium-size fishing operators, which are users of the fisheries domain too, and who might be affected by the project. From interviewing representatives of fishing villages, i.e., the local fishermen and coastal fish farmers who attended the Human Rights Committee forum, none of them had any knowledge of the project prior to the forum.</p>
III.B.10 Duration of public comment period for project-level decision	
Values	Explanation and Justification
<p>(0) Not applicable/not assessed</p> <p>(i) <u>No public comment period was designated</u></p> <p>(ii) The public was given minimal time for comment</p> <p>(iii) The public was given reasonable time for comment</p>	<p>From questioning the Department of Fisheries, it was stated that the Department did not make arrangements to consider opinions from the public; it only gave out information in the form of press conference, which was organized after the project was approved for implementation by the cabinet.</p>

III.B.11 Public participation in renewal, extension, modification, or termination of project-level decisions	
Values	Explanation and Justification
<p>(0) <u>Not applicable/not assessed</u></p> <p>(i) The decision-making authority has not established a process for public participation in oversight of project renewal, extension, modification, or termination</p> <p>(ii) The decision-making authority has established a process for public participation in oversight of project renewal, extension, modification, or termination</p> <p>(iii) The decision-making authority has established a process for public participation in oversight of project renewal, extension, modification, or termination, and is actively providing information to the public and soliciting</p>	<p>No forums were in place for a review of the project, i.e., to discuss whether improvement of the project is needed or whether it should be terminated.</p>
III.B.12 Timeliness of information given to the public about outcomes of consultations used in project-level decision-making	
Values	Explanation and Justification
<p>(0) <u>Not applicable/not assessed</u></p> <p>(i) No information was provided to the public about the substantive input or comments from the public consultation process</p> <p>(ii) Information was provided to the public about the substantive input or comments from the public consultation process more than 2 months after the decision was made</p> <p>(iii) Information was given to the public about the substantive input or comments from the public consultation process within 2 months of the decision</p>	<p>Cannot evaluate this point because in this case there was no consultation with the public as a part of the decision-making process.</p>

III.B.13 Incorporation of public input in project-level decision	
Values	Explanation and Justification
<p>(0) Not applicable/not assessed</p> <p>(i) <u>Official project documents do not discuss whether or how public input was incorporated in design or decision</u></p> <p>(ii) Official project documents mention public input (whether consultations were held, how many were held, etc.)</p> <p>(iii) Official project documents discuss how public input was incorporated, and summarize/explain the results of public input</p>	<p>Subsequent to the public seminar on The Seafood Bank Project and Solving the Poverty Problem organized by the Subcommittee on Marine Resources and by the Human Rights Commission during 20-21 July 2004 in Haad Yai District in Songkla Province, and during 27-28 September 2004 at the Royal River Hotel in Bangkok, a suggestions paper on the topic of making adjustments to some project decisions was handed to the Department of Fisheries. But a check of the website of the project and related paper documents did not show any reference to such inputs, and the Department has not shown any indication of whether or how it would consider applying these suggestions.</p>
III.B.14 Degree of participation by affected parties or public interest groups in implementation of decisions on project-level activity	
Values	Explanation and Justification
<p>(0) <u>Not applicable/not assessed</u></p> <p>(i) Affected parties did not participate in implementation or monitoring of compliance with project-level activity or decision</p> <p>(ii) Affected parties participated in direct monitoring of project-level activity or decision</p> <p>(iii) Affected parties participated in design of compliance measures and in monitoring of project-level activity or decision</p>	<p>Not applicable to this case because the project implementation was not open to public participation.</p>

Analysis

From a review of the Seafood Bank Project, using the indicators specified, it was found that in general, agencies implementing the project placed very little importance on public participation. They did not inform the public about the project in advance, as can be seen by the fact that after the cabinet resolution establishing the project, the project itself materialized not so long afterwards. As for dissemination of project news and information to the public and target groups, this was done through a limited range of media, that is, only through television and website. The television programmes though done as a documentary was rather short at 2 minutes, and the content emphasized more on the development of food sources and the assurances on food safety, rather than on project developments, its implementation plan, and its results both positive and negative once implemented.

Moreover, the quality of information used to support project decision-making by the authorities was an issue, as borne out by the analysis using the indicators. It was found that for this project no research was done on environment factors and possible impact on society and coastal ecology of the project. Only some consultation was done with The Hydrology Department of the Royal Thai Navy for the purpose of mapping the project base, which is to be used for assessing potential areas that could be used in the project.

With regards to information and news that was disseminated by website, it was found that the content was mainly one of detailing the principles governing the project, but there was no clear delineation of project areas. Moreover, the fact of communicating information through the internet is in itself a limiting factor because most of the target groups are farmers and the possibility for them to access this mode of information is quite low.

However, the responsible agency has not ignored the importance of independent organizations, as can be seen by the fact that the responsible state agency has twice participated in two public forums organized by the Human Rights Commission on the project, in which it gave out information and listened to suggestions. Although the information conveyed was indirect i.e. through a third-party forum, but at least it gave relevant groups an idea on the project background and its progress. And interested people can then follow up and contact the agency concerned directly if they have further questions or if they want to make suggestions.

After analyzing the Seafood Bank Project and comparing it with efforts by the Department of Fisheries in the past to promote coastal seafood farming, it was found that the ideas behind both are similar. That is, the aim of both is to promote coastal farming as an alternative to traditional fishing or fishing by conventional means, and to issue seafood farming permits to coastal fishermen. But this kind of permit issuance in effect results in monopoly in the utilization of coastal areas, and in turn led to the areas becoming privately owned, even though originally it was a public domain open to public use. This is what has actually happened in communities after the promotion of coastal fishing by the permit scheme.

In addition, not only is there a problem of transformation of the public domain into private property, but there is also a problem of transferring of ownership of the permit. Even though the original aim of the Fisheries Department was to encourage local or poorer people in communities to invest in fishing but in the end it was the capitalists that became the holder of rights instead, and villagers became merely hired workers looking after fishing operations, as can be seen in many areas such as in Surat Thani and Pattani provinces. This is because a large amount of capital is nowadays needed to invest in coastal farming as the operation has to bring in expensive factors from outside the area, whether it be feed and chemicals, in contrast

to traditional fish catching methods which merely use natural inputs. Another problem anticipated from the seafood bank project once it is implemented is the conflict of interests between permit holders claiming rights in the same area. Although the Fisheries Department had done mapping surveys of the areas, but the fact is that the some seafood cultivation operations have expanded beyond the areas allowed for in their permits. Thus, it is vital for the Department to solve this problem successfully otherwise violent conflicts over marine and coastal resources might develop. A study titled "Preliminary Information on the Seafood Bank Project" (Banjong Nasae, 2004) predicted that the project if implemented in the planned areas of Baan Don Bay in Surat Thani Province and Pattani Bay in Pattani Province may lead to conflict.

In any case, there are some important lessons to be learned from the coastal farming permit scheme. That is, any government project or policy that lacks transparency and local community participation will affect the way of life of traditional local communities. If government agencies do not try to seek a common understanding with the communities and do not try to get feedback from them, long term effects will occur. Not only will the communities suffer from a loss of access rights to resources but they also might lose their occupations and income. And in some cases community conflict will arise to the extent that it might lead to fractured communities.

Recommendations

• For Thailand

From the analysis using the indicators, the Fisheries Department as the responsible agency needs to act urgently on many issues.

- 1) It is important to be receptive to opinions, as part of a building up of the process of public participation and transparency in agency work activities. The Department of Fisheries and those responsible for the Seafood Bank Project should, before commencing a project in an area, hold information and consultation sessions with local residents, especially for those whose livelihood is dependent on or whose work is related to the sea, whether they are local fishermen, seafood farming groups, and government officials responsible for commercial fishing. Officials from agencies related to the policies of the intended project should also attend the sessions. Such real and on the ground information would assist the Department of Fisheries to broaden its perspective and vision, which could then be used to formulate policy, instead of relying on policies handed down by the central government agencies.
- 2) The Department of Fisheries needs to make available area data and information that the state has in hand for all parties involved. It must work together with private development organizations, the Federation of Local Fishermen, as well as coastal communities to study and gain clarity about utilization of the area before implementing the project. The study must be able to present clear information as to how the project will distribute the resultant benefits to coastal communities, how it will head off any conflict with fishermen groups already farming or fishing there, and what are the advantages and disadvantages of the project.
- 3) There should be more dissemination of information through a broader range of media, and the media in use should be improved, for example websites must be updated. More channels of communication with local people should also be

developed because the project impacts many groups, but presently only certain groups are aware of the information. Moreover, the information provided is not clear and extensive enough for concerned groups to make decisions, since the project has ramifications on many communities, in terms of their way of life, the laws governing them, and their rights in managing natural resources.

- 4) The state and the Department of Fisheries need to craft a clear mechanism for monitoring, inspection, and evaluation. It must be a mechanism in which communities, the state, and social organizations work together, not one conceived and implemented solely by the state.
- 5) There should be comprehensive studies done, covering the economic, social, and environmental factors involved, rather than analyses that are narrowly area-focused. Environmental impact of coastal seafood farming studies should in particular be done, including studies on what should be the operational guidelines for monitoring and tracking, to see to it that the activities deriving from the project do not damage coastal natural resources. Also, more studies should be done on the lessons learnt from permit issuance for fisheries farming in the past, the bad and good effects on farmers and other related groups. Such lessons could then be used to create new ideas to prevent problems from happening and to design clear measures and standards to be applied to the players and affected groups, before starting the project on the ground.
- 6) Importance should be given to increasing and deepening knowledge of the communities involved. The Department of Fisheries, in its interaction with local people, often lacks a social dimension and shows a lack of respect for local knowledge and wisdom, resulting in a conflict of ideas with the community, which in turn affected implementation work. Thus, agencies should not overlook the value of the community's traditional knowledge and ideas, but should work to support and promote them, while at the same time make some adjustments to them and apply such knowledge concurrently in implementing policy. Part of the reason for doing this is to develop a body of knowledge that fits the needs of the community. At the same time it is a way to build up a process of public participation and devolution, and to promote community rights, all of which are in accordance with the spirit of the constitution.
- 7) Management of natural resources must place importance on the resources themselves and develop a clear standard that can be used by agencies when they make decisions. At the same time a process of public participation must be designed such that people can access and be comfortable with. Assurances must also be made to people before a project begins that the area under the project will not be transformed into a privately owned area, but will still remain a public domain accessible to them as before. And that such area is deemed as an asset that cannot be bought and sold, should a transfer of rights occur. The state must develop and push for a community level mechanism that can be a tool for the community to use when they want to make supporting moves or any adjustments collectively. This could be in the form of a handbook or guideline developed by government agencies for community use in interactions with the agencies.
- 8) The state and the Fisheries Department must continuously support academic studies and research on marine resources, such that it involves academics, communities, and people sector organizations from the beginning of the studies to the end.