



What Rights? Measuring the Depth of Indigenous Peoples and Community Forest Tenure: Preliminary Findings from a Legal Analysis of 33 Forest Tenure Regimes in 15 Countries

JULY | 2011

Fernanda Almeida and Jeffrey Hatcher¹

This brief presents some preliminary results of a legal analysis conducted by RRI to provide a fuller picture of Indigenous Peoples and community forest tenure rights globally. This analysis unpacks the collective rights to forestland and forest resources held by communities¹ and codified in law. RRI has developed a database monitoring the dynamics of statutory forest tenure rights over time in approximately 45 forested countries covering more than 90% of the world's forests.² The present legal analysis complements the tenure distribution data by clarifying what legal rights are associated with Indigenous Peoples community forest tenure regimes.

Two important caveats must be made about this analysis. First, this analysis is limited to community forest tenure regimes established by national legislation and does not cover the wider set of instruments that provide or recognize the rights of forest communities and individuals.³ Second, it is important to note that a law might provide a wide spectrum of rights to communities on paper without being exercised in practice. In some cases, the forest area under community tenure regimes accounts for a significant portion of the country's forests (e.g. Brazil, at least 25 percent) while in others it accounts for almost none despite the existence of community tenure regimes (e.g. Indonesia, less than 1 percent).

Due to the complexity and specificities of national legislation, and the goal of creating a comparative database of rights, this analysis uses the "Bundle of Rights" conceptual framework as its foundation (see Table 1). The analysis assesses whether communities can access forest resources;

make decisions over forest management; commercially harvest timber or other forest products; exclude outsiders from their forests; whether the tenure regimes confer the right to lease, sell, or use forests as collateral; and, whether the law guarantees communities due process and fair compensation if the state revokes these rights. An additional element was added to this analysis: the duration of the conferred rights (limited or unlimited).

RRI examined the legal basis of 33 tenure regimes that accord rights to communities in 15 countries. In Asia: China, India, Indonesia, and Papua New Guinea (PNG); in Africa: Cameroon, the Democratic Republic of Congo (DRC), Mozambique and Zambia; in Latin America: Bolivia, Brazil, Colombia, Mexico, Peru and Venezuela; and in Australia.⁴ These 15 countries are home to close to 70% of the world's tropical forests.

The data was collected through a thorough literature review and analysis of over 80 laws and other legal documents. Subsequently, more than 40 local experts verified the preliminary results, helping to ensure that the data was as complete as possible and that it was based on the most up-to-date laws and regulations, and consistent with the interpretation of local courts and government bodies. The results (see Table 5) are based on legislation and does not account for the implementation or lack thereof of these rights. Where possible the area (in millions of hectares) under each regime is included in the regional summary tables to provide context on the implementation of the regimes.

RRI PARTNERS



¹Fernanda Almeida is an independent legal consultant. Jeffrey Hatcher is Director, Global Programs, RRI. Research support was provided by Luke Bailey, Claire Biason, Jonathan Karver and Melissa Rice.

TABLE 1. THE BUNDLE OF RIGHTS⁵

Access right is the right held by a community and its members to enter a forest area.
Withdrawal right is the right held by a community and its members to use and benefit from non-timber forest resources and timber resources from the forest area. A community may have withdrawal right for subsistence and/or commercial purposes.
Management right is the right held by a community and its members to regulate internal use patterns or transform the resource. The management right is exercised within the limits of the other rights and is not conditional to the right to withdraw timber resources for commercial purposes.
Exclusion right is the right held by a community and its members to decide who can use the resources and who cannot.
Alienation right is the rights held by a community and its members to sell, lease, or use the land as collateral, including the sale of all other rights.

Global Analysis

All countries analyzed in this study have established legal frameworks granting local and indigenous communities statutory rights to forest resources since the 1990s. We have identified at least one tenure regime in all the countries we analyzed, totaling 33 regimes. Of these, 29 were created after 1990⁶ and 14 are recognized in national constitutions. In some cases, this recognition happened only recently. In Asia, Indonesia recognized Adat Forest in the constitutional reform of 2000. In Latin America, Bolivia's constitution recognized indigenous and peasant communities' rights to land in 2009. None of the African countries in our sample include community forest tenure regimes in their constitutions.

In spite of such progress, obstacles still remain even when land rights are recognized. For example, 88% (29 out of 33) of the examined tenure regimes allow communities to harvest some timber, but 10% (3 out of 29) of these regimes explicitly prohibit commercialization of timber resources by the communities. In 79% (26 out of 33) of the tenure regimes, communities must comply with management plans and/or licenses. Of this set, 23% (6 out of 26) of the regimes do not allow communities to manage the forest alone. They either have a seat on the management board (usually presided by a government official) of the respective forest area or have no management rights at all.

Despite the fact that the legal management rights of communities are granted in most of the laws, in 27% (9 out of 33) of the cases, communities do not have the right to exclude others from using the forest resources within the boundaries of their forest. Also, while some regimes grant alienation rights, the majority of the tenure regimes do not give communities the right to alienate their land or any of the other rights. Furthermore, in 58% (19 out of 33) of the analyzed tenure regimes, rights are granted to communities for an unlimited period of time and in 18% (6 out of 33) of regimes the law provides no due process or compensation if the state takes away rights given to communities.

Regional Analysis

Asia

Four Asian countries - China, India, Indonesia and PNG – are included in the analysis with a total 7 community forest tenure regimes. These countries are home to approximately 65% of Asia's forests.⁷

All regimes allow communities access to forest resources, and give them the right to exploit and benefit from timber and non-timber resources. The only exception is Kemitraan (Partnership) in Indonesia, where communities' rights depend on an agreement local communities reach with holders of business licenses or of rights to exploit forests. All Asian tenure regimes require management plans and/ or licenses to exploit timber. In 57% (4 out 7) of the cases, communities

TABLE 2. ASIAN CASES

Country	Tenure Regime	Area under regime (mHa)
China	Collective Ownership with individual property rights to Forestland	99.4
India*	Scheduled Tribes and Other Traditional Forest Dwellers Land	1.4
Indonesia**	<i>Adat Forest</i> (Customary Law Forest)	n/a
	<i>Hutan Kemasyarakatan</i> (Rural or Community Forest)	0.06
	<i>Kemitraan</i> (Partnership)	n/a
	<i>Hutan Tanaman Rakyat</i> (People Plantation or People Plant Forest)	0.59
Papua New Guinea	Common Customary Land	25.51

* There may be other Indigenous Peoples and community tenure regimes on state level in India; however, we base our analysis on national level legislation only. We have also not included Joint Forest Management Agreements because they are established by a non-legally binding document.

** We have not included *Hutan Desa* (Social or Village Forest), because this type of regime gives local governments, and not local communities, rights to forest resources.

have the right to make decisions about forest management.⁸

In 71% (5 out of 7) of the identified regimes in Asia, communities can exclude others from using their forest resources. In 2 cases communities have the right to lease (China and PNG) and in one they may use rights as collateral or sell their land with the approval of the clan and other community members (PNG). Forty-three percent (3 out of 7) of the regimes (all in Indonesia) give communities rights to forest resources for a limited time period; and in 29% (2 out of 7) (also all in Indonesia) the government is not required to compensate the communities in case it decides to remove communities' rights.

Africa

Four African countries – Cameroon, DRC, Mozambique and Zambia

– are included in the analysis with a total of 6 community forest tenure regimes. These countries are home to approximately 40% of Africa's forests.⁹

All regimes allow communities to access forest resources with the exception of Joint Forest

Management (JFM) in Zambia. In this regime, access rights are not given to community member directly, but to the Forest Committee, the JFM Area managing body. All regimes allow for some exploitation of non-timber and timber resources; from these 67% (4 out of 6) allow for commercial exploitation and management of these forest resources. The exceptions are the Zones with Historical Culture Use and Value (Mozambique) that allows for subsistence use only and Joint Forest Management Area (Zambia), where it depends on the JFM agreement.

Africa presents the lowest level of security of rights in the analyzed community tenure regimes. While globally 73% (24 out of 33) of the regimes allow communities to exclude others from using their forest resources, in Africa 50% (3 out of 6) of the tenure regimes do not give communities exclusion rights. Furthermore, while in the global

TABLE 3. AFRICAN CASES

Country	Tenure Regime	Area under regime (mHa)
Cameroon	Community Forests (Forêts Communautaires)	0.64
DRC	Local Community Forest Concession (LCFC) (Concessions Forestières communautaires)	0.0
Mozambique	Zones with Historical Culture Use and Value	n/a
	Community DUATs Within Multiple Use Areas	n/a
	Forest Concessions to Communities	n/a
Zambia	Joint Forest Management Area	0.10

TABLE 4. LATIN AMERICAN CASES

Country	Tenure Regime	Area Under regime (mHa)
Bolivia	Territorio Indígena Originario Campesino (Peasant Indigenous Territory)	11.4
	Propiedades Comunitarias (Communal Property)	n/a
	Títulos Comunales para Comunidades Agro-extractivistas (Norte Amazónico) (Communal Titles for Agricultural-Extractivist Communities in the Northern Amazonian Region)	n/a
	Agrupaciones Sociales del Lugar (ASL) (Location-Based Social Associations)	0.7
Brazil	Reserva extrativista (Extractivist Reserve)	9.57
	Reservas de Desenvolvimento Sustentável (Sustainable Development Reserves)	7.53
	Florestas Nacionais (National Forest)	n/a
	Projeto de Assentamento Agro-Extrativista (Agro-extractivist settlements projects)	2.61
	Projetos de Assentamento Florestal (Forest Settlement Projects, special to the northern region)	0.10
	Projeto de Desenvolvimento Sustentável (Sustainable Development Projects)	2.9
	Territórios Quilombolas (Quilombola Communities)	n/a
	Terras Indígenas (Indigenous Lands)	109.13
Colombia	Resguardos Indígenas (Indigenous Resguardos)	26.3
	Tierras de las Comunidades Negras (Afro-Colombian Community Lands)	3.5
Mexico	Ejididos localizados en tierras forestales (Ejididos located in forest land)	38.71
	Comunidades (Communities)	n/a
Peru	Tierras de Comunidades Nativas con aptitud Forestal (Native Community Forest Lands suitable for forestry)	n/a
	Tierras de Comunidades Campesinas con aptitud Forestal (Peasant Community Forest Lands suitable for forestry)	n/a
Venezuela	Tierras Indígenas en Areas Bajo Regimen de Administracion Especial (ABRAE)	n/a

average 58% (19 out of 33) of the communities are given rights in a permanent manner, in 67% (4 out of 6) of the cases in Africa, communities' rights are temporary. Additionally, only in 50% (3 out of 6) of the cases the government has to comply with due process or compensate the communities in case it decides to remove communities' rights, while globally this is the case for 82% (27 out of 33) of the tenure regimes. One possible reason to explain is the way communities are granted rights to forest resources. In 67% (4 out of 6) of the identified regimes the rights are given in the form of a concession or an agreement between the government and the communities and not in the

form of a title to the land or other stronger recognition process.

Latin America

Six Latin American countries– Bolivia, Brazil, Colombia, Mexico, Peru and Venezuela– are included in the analysis with a total of 19 community forest tenure regimes. These countries are home to approximately 92% of Latin America's forests.²⁰

Latin American countries provide a broad and complex set of tenure systems that grant local and indigenous communities rights to forest resources.

Of the identified regimes, all allow communities to access forest resources, and, with one exception,³¹ all allow communities to use and benefit commercially from timber and non-timber resources. Furthermore, in 84% (16 out of 19) of the tenure regimes, communities have the right to make decisions over forest management according to their traditions or internal rules. In all cases, however, the exercise of withdrawal and management rights is limited by forest management plans and/or licenses to exploit timber resources. In many cases (e.g., all of the Brazilian tenure regimes), this means that communities have to comply with complex bureaucratic procedures and several legal conditions, placing many barriers to the exercise of their right in practice.

Seventy-nine percent (15 out of 19) of the examined regimes allow communities to exclude others from using their forest resources. Only 21% (4 out of 19)³² of them allow some alienation rights. However, these rights are limited to alienation to enterprises or associations composed by communities' members. In all cases governments have to comply with due process or compensate the communities in case it decides to remove communities' rights. Finally, 63% (12 out of 19) of the regimes give communities rights for an unlimited period of time.

Key Findings and Implications

1. All countries in the sample have recognized one or more form of community tenure rights. Most of the countries have done so since the 1990s and many of them have strengthened these rights since the 2000s.
2. In all 15 countries, local and/or indigenous communities have some rights to exploit and manage timber or non-timber resources commercially, but these rights are limited in practice and are subject to management plans and licenses (80% of cases).

3. The security provided by the tenure regimes varies. The right to exclude outsiders is more common (73% of the cases) than the right to alienate holdings (27% of the cases provide for some form of alienation right).
4. Many of the tenure regimes have not been put into practice. The area under the regimes, for which data is available, is often a small fraction of the country's total forest area.

Though the advances in providing Indigenous Peoples and community forest tenure regimes since the 1990s is often a major step towards empowering forest communities, several challenges remain.

1. Community forest tenure rights are often limited to management rights with strict compliance requirements to management plans that are often onerous to prepare.
2. Putting the community tenure regime into place is often mired in bureaucratic procedures and political opposition to stronger community rights.
3. Understanding the individual rights (especially those of women) within the community will require further analysis. Focusing on community tenure rights can obscure the internal decision-making structures that can discriminate against groups or individuals within communities.
4. The presumption of state or public ownership of forest land and resources still dominates many of the world's forested countries. Countering this presumption will require more effort than the creation of limited community tenure regimes.

A complete publication covering an additional 15 countries will be released in early 2012. The complete methodology, all data and sources used for this brief are available at www.rightsandresources.org/tenurerights

TABLE 5. FIFTEEN COUNTRY CASES

Country	Tenure Regime	Year Enacted	Area under this tenure regime ⁸ (mHa)	Access	Withdrawal (NTPF)	Withdrawal (Timber)	Management	Exclusion	Alienation (lease)	Alienation (Collateral)	Alienation (Sales)
Australia	Native Title	1993	20.86	✓	—	—	—	✓	✗	✗	✗
	Territorio Indígena Originario Campesino (Peasant Indigenous Territory)	1996 (2009) ¹⁴	11.4 ¹⁵	✓	✓	✓	✓	✓	✗	✗	✗
Bolivia	Propiedades Comunitarias (Communal Property)	1996 (2009)	n/a	✓	✓	✓	✓	✓	✗	✗	✗
	Títulos Comunales para Comunidades Agro-extractivas (Norte Amazónico) (Communal Titles for Agricultural-Extractivist Communities in the Northern Amazonian Region)	2004	n/a	✓	✓	✗	✓	✓	✗	✗	✗
	Agrupaciones Sociales del Lugar (ASL) (Location-Based Social Associations)	1996	0.7 ¹⁶	✓	✓	✓	✓	✓	✓	n/a	✓
	Reserva extractivista (Extractivist Reserve)	2000	9.57	✓	✓	✓	—	✗	✗	✗	✗
Brazil	Reservas de Desenvolvimento Sustentável (Sustainable Development Reserves)	2000	7.53	✓	✓	✓	—	✗	✗	✗	✗
	Florestas Nacionais (National Forest)	2000	n/a	✓	✓	✓	✗	✗	✗	✗	✗
	Projeto de Assentamento Agro-Extractivista (Agro-extractivist settlements projects)	1996	2.61	✓	✓	n/a	✓	✓	✗	✗	✗
	Projetos de Assentamento Florestal (Forest Settlement Projects, special to the northern region)	2003	0.10	✓	✓	✓	✓	✓	✗	✗	✗
	Projeto de Desenvolvimento Sustentável (Sustainable Development Projects)	1999	2.9	✓	✓	—	✓	✓	✗	✗	✗
	Territórios Quilombolas (Quilombola Communities)	1988	n/a	✓	✓	✓	✓	✓	✗	✗	✗
Cameroon	Terras Indígenas (Indigenous Lands)	1988	109.13	✓	✓	✓	✓	✓	✗	✗	✗
	Community Forests (Forets Communautaires)	1994	0.64 ¹⁸	✓	✓	✓	✓	✓	✓	✗	✗
China	Collective Ownership with individual property rights to Forestland	1982	99.94	✓	✓	✓	✓	✓	✓	✗	✗
Colombia	Resguardos Indígenas (Indigenous Resguardos)	1991	26.3 ¹⁹	✓	✓	✓	✓	✓	✗	✗	✗
	Tierras de las Comunidades Negras (Afro-Colombian Community Lands)	1991	3.5 ²⁰	✓	✓	✓	✓	✓	✗	✗	✗
DRC	Local Community Forest Concession (LCFC) (Concessions Forestières communautaires)	2002	0.0	✓	✓	✓	✓	To be defined	✓	✗	✗
India	Scheduled Tribes and Other Traditional Forest Dwellers Land	2007	1.4 ²¹	✓	✓	✓	✓	✓	✗	✗	✗

TABLE 5. FIFTEEN COUNTRY CASES (CONTINUED)

Country	Tenure Regime	Year Enacted	Area under this tenure regime* (mHa)	Access	Withdrawal (NTPF)	Withdrawal (Timber)	Management	Exclusion	Alienation (lease)	Alienation (Collateral)	Alienation (Sales)
Indonesia	Adat Forest (Customary Law Forest)	1999 (2000) ²²	n/a	✓	✓	✓	✓	✗	✗	✗	✗
	Hutan Kemasyarakatan (Rural or Community Forest)	2007	0.06 ²³	✓	✓	✓	—	✓	✗	✗	✗
	Kemitraan (Partnership)	2007	n/a	case by case	case by case	case by case	case by case	✗	n/a	n/a	n/a
	Hutan Tanaman Rakyat (People Plantation or People Plant Forest)	2007	0.59 ²⁴	✓	✓	✓	✗	✓	✗	✗	✗
Mexico	Ejidotes localizados en tierras forestales (Ejidotes located in forest land)	1992 ²⁵	38.71	✓	✓	✓	✓	✓	✓	✓	✓
	Comunidades (Communities)	1992	n/a	✓	✓	✓	✓	✓	✓	✓	✗
Mozambique	Zones with Historical Culture Use and Value	1999	n/a	✓	✓	—	✓	✗	✗	✗	✗
	Community DUATs Within Multiple Use Areas	2007	n/a	✓	✓	✓	—	✓	✗	✗	✗
	Forest Concessions to Communities	1999	n/a	✓	✓	✓	✓	✓	✓	n/a	✗
	Common Customary Land	1975	25.51	✓	✓	✓	✓	✓	✓	✓	✓
Peru	Tierras de Comunidades Nativas con aptitud Forestal (Native Community Forest Lands suitable for forestry)	1993	n/a	✓	✓	✓	✓	✓	✗	✗	✗
	Tierras de Comunidades Campesinas con aptitud Forestal (Peasant Community Forest Lands suitable for forestry)	1993	n/a	✓	✓	✓	✓	✓	✓	✓	✗
Venezuela	Tierras Indigenas en Areas Bajo Regimen de Administracion Especial (ABRAE)	1999	n/a	✓	✓	✓	✓	✗	✗	✗	✗
Zambia	Joint Forest Management Area	2006	0.10	✗	case by case	case by case	—	✗	✗	✗	✗

For all rights

✓ – the law guarantees the right
✗ – the law does not guarantee the right
n/a – not available

For withdrawal rights

✓ – the law allows commercial use conditional to management plans and/or licenses and to environmental and other legislation limits
— – the law only guarantees subsistence use right
✗ – the law does not guarantee the right

For management rights

✓ – the law guarantees the right to manage within management plans, and limits of environmental and other legislation
— – the law guarantees communities the right to participate on the management board
✗ – the law does not guarantee the right

Endnotes

1. This analysis is limited to collective rights held by Indigenous Peoples and communities as defined by national legislation and does not include household or individual tenure. The full report analyzing this research will include a discussion on the limits of the analysis and the role that household/individual tenure plays in forest management, for example in China.
2. See <http://www.rightsandresources.org/pages.php?id=229>
3. Examples could include constitutional rights to culture, livelihoods, safe environments and mobility; sub-national and local level legislation; or international instruments such as the International Labor Organization Convention 169 or the UN Declaration on the Rights of Indigenous Peoples. The analysis does include international treaties when they have been ratified by the countries and deal directly with community tenure rights.
4. Australia, has one community tenure regime (Native Title), that was included in the global table but not in the regional table and analysis. The Native Title in Australia accounts for 20.86 mHa of land.
5. Definitions adapted from Schlager, Edella, and Elinor Ostrom. Property-rights regimes and natural resources: A conceptual analysis, *Land Economics* 68.3 (1992): 249-62; and Barry and Meinzen-Dick, 2008. The invisible map: community tenure rights. Paper presented at the 12th Conference of the International Association for the Study of the Commons (IASC), Cheltenham, UK.
6. The exceptions are the two constitutional tenure regimes in Brazil (Indigenous Territories and Quilombola Communities – 1988), China's Collectives and PNG's Common Customary Land.
7. Total forest area of the 4 Asian countries is 389.5mHa. The total forest area of Asia (East, South and South-east, Western and Central Asia, Papua New Guinea) is 621.2mHa. Source: FAO (2010) Global Forest Resources Assessment 2010. FAO. Rome.
8. Communities have no right to manage in the case of Tanaman Rakyat (People Plantation or People Plant Forest), and can manage forest resources jointly with the forest management totality in the case of Hutan Kemasyarakatan (Rural or Community Forest).
9. The total forest area of four African countries is 262.3mHa. The total forest area of Africa is 674.4mHa. FAO (2010).
10. The total forest area of six Latin American countries is 816.3mHa. The total forest area of Latin America (including Central America) is 883.8mHa. FAO (2010).
11. Títulos Comunales para Comunidades Agro-extractivitas (Norte Amazónico) (Communal Titles for Agricultural-Extractivist Communities in the Northern Amazonian Region) in Bolivia where communities are not allowed withdrawal timber products for commercial purposes.
12. Agrupaciones Sociales del Lugar (ASL) (Location-Based Social Associations) in Bolivia; Ejidos localizados en tierras forestales (Ejidos located in forest land) and Comunidades (Communities) in Mexico; and Tierras de Comunidades Campesinas con aptitud Forestal (Peasant Community Forest Lands suitable for forestry) in Peru.
13. Unless otherwise noted, all data from RRI & ITTO (2011) Tropical forest tenure assessment. ITTO Technical Series 37. ITTO: Yokohama.
14. Bolivia's 2009 constitution recognized indigenous and peasant communities' rights to land.
15. ITTO (2011) Status of Tropical Forest Management 2011. ITTO Technical Series 38. ITTO: Yokohama
16. ITTO (2011).
17. Data for Brazil changes frequently. All data presented here is from Serviço Florestal Brasileiro <http://www.mma.gov.br/index.php?ido=conteudo.monta&idEstrutura=95&idMenu=9922>
18. Oyono, R. (2009) New niches of community rights to forests in Cameroon: tenure reform, decentralization category or something else?. *International Journal of Social Forestry*. 2009, 2(1):1-2. http://www.ijfsf.org/dat/art/volo2/ijfsf_vol2_no1_01_oyono_community_rights_cameroon.pdf
19. ITTO (2011).
20. ITTO (2011).
21. Government of India Ministry of Tribal Affairs (2011) Status report on implementation of the Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Forest Rights) Act, 2006. For the period ending 31st May 2011. <http://tribal.nic.in/writereaddata/mainlinkFile/File1287.pdf>
22. Art. 18B recognizing customary law societies was included in Indonesian constitution by the Second Amendment of 18 August 2000.
23. Dahal, G. et al (2011) Forest Tenure in Asia: Status and Trends. Center for People and Forests and RRI. Bangkok.
24. Dahal, G. et al (2011)
25. Ejidos exist in Mexico since colonial times. Their first codification into written law was in 1917. However, the rights of Ejido members were strengthened considerably by the constitutional reform of 1992. We consider Ejido rights as established by this reform and for this reason we count 1992 as the year of enactment, and not an earlier date.

The Rights and Resources Initiative (RRI) is a strategic coalition comprised of international, regional, and community organizations engaged in development, research and conservation to advance forest tenure, policy and market reforms globally.

The mission of the Rights and Resources Initiative is to support local communities' and indigenous peoples' struggles against poverty and marginalization by promoting greater global commitment and action towards policy, market and legal reforms that secure their rights to own, control, and benefit from natural resources, especially land and forests. RRI is coordinated by the Rights and Resources Group, a non-profit organization based in Washington, D.C. For more information, please visit www.rightsandresources.org.

This publication was made possible with the support of the Ford Foundation, Ministry of Foreign Affairs of Finland, Norwegian Agency for Development Cooperation, Swedish International Development Cooperation Agency, Swiss Agency for Development and Cooperation, and UK Department for International Development. The views presented here are those of the authors and are not necessarily shared by the agencies that have generously supported this work, nor by all the Partners of the RRI coalition.