



BLUE ECONOMY: POLICY AND ACTION PLAN FOR THE PROMOTION OF A RESILIENT AND SUSTAINABLE ECONOMY OF THE SEA IN TIMOR-LESTE [2025-2035]

Consultation Period: 11 – 30 September 2025

Blue Economy Policy and Action Plan for Timor-Leste available [HERE](#) or scan below:



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General Feedback

1. General feedback about the Blue Economy: Policy and Action Plan for the Promotion of a Resilient and Sustainable Economy of the Sea in Timor-Leste

From La'o Hamutuk we consider this document to have significant issues. Although we appreciate the wide perspective and thought that went into preparing it, and agree with most of its general objectives, we worry that it will not be taken seriously when policies are designed and implemented. Will it end up as one more unread document in a foreign language?

We find problematic that there is no clear definition of Blue Economy. It is somewhat misleading to call it a paradigm shift, when there is still no clear framework. This blurs the lines of its meaning and open up a path for abuse by foreign or third parties in search of new resource frontiers. This vagueness, along with a contentious logic, is present throughout the paper. This is noticeable in the inclusion of natural resources as a sustainable sector. There is concern that this concept has been co-opted to continue business as usual with the help of greenwashing and bluewashing. From this it follows; we should question the notion of sustainability here present to thorough examine its potential for ecological balance. What is the definition of sustainable? We contest any definition that leads to the establishment and entrenchment of industries that damage the future of people. A number of sectors targeted in this proposal will cripple the capabilities of the ecosystems of Timor-Leste to sustain life and and the potential for livelihoods which lead to well-being for the Timorese. Past and present experience have shown that an over-reliance on resources as a source of income and economic activities place our country and, more importantly, our people in a precarious and vulnerable position; note 'resource curse' effects. This effect is compounded by the effects of the transgression of planetary boundaries on SIDS (Small Island Developing States) such as Timor-Leste. There is a reason why there is local resistance to deep-sea mining in the Duke of York Islands in Papua New Guinea (Childs, 2018), which has been depicted as a sustainable practice. These facts hint at the importance of instilling the sustainable element into whatever the Blue Economy ends up defined as. This is not to say that Common But Differentiated Responsibilities (CBDR) do not exist and perhaps demands to other nations, who are greatly more responsible for this planetary change, should be part of this action plan. Timor-Leste will have to find and strike a balance with the sea to take care of it while living embedded in it to sustain Timorese lives.

Prior to continuing with our general feedback, we will take a moment to appreciate consulting the people in this process of policy making; it is a welcome change compared to past experience, especially when the feedback is integrated and reflect many voices of our societal make-up. This will mean that the government listens when the people speak. Though there is room for more consultation, just so the document reflects Timorese needs and priorities but also Timorese understandings of the Blue Economy.

There are three main points we consider critical: this proposal should focus on positive outcomes for the Timorese, not the private sector nor foreign actors (1), in accordance, there should be mechanisms of control of investment to make sure the interests of the Timorese people and the environment take precedence over the interests of the private sector and foreign actors (2), it is critical that a sound, robust and extensive legislation and regulation is created to protect our people and environment (3) and while we applaud the intention, we must be realistic and adequate our goals to our current conditions and capabilities (4).

Additionally, there are reasons to consider there is still work to be done.

1. There is absence of detail. There are many ideas and this is good; we have to think of every possible option. But all of these proposals involve endeavours that are full of complexities and that is precisely why we require an atomic level of detail to get this right. These absences are noticeable throughout the document, but especially in the last pages, which are, for the most part, empty tables.

2. Many different sector are targeted in this proposal. We need to focus on a limited number of sectors for various reasons. That number of sectors would require significant amount of investment. Also, some sectors in the proposal require more expensive investment than other sector. And some sectors attend to immediate problems in Timor-Leste more than others (e.g. access to food, stocks of food and health problems associated to this). We should prioritise sectors that attend to these needs and are cheaper to invest in. Related to this latter point are demographic considerations. 65% of the Timorese population's livelihoods consist of subsistence farming and the existing infrastructure (e.g. regulatory, fiscal, physical...) in Timor-Leste, while improved in the last number of years, is limited and not ready for some of these sectors. This proposal has not taken this into account to the fullest extent and this is critical for success. Also, there are not enough funds to invest in all of these sectors. Were we to do this as a country and we would not get to the critical threshold level of investment required to produce outcomes. Taking this into account involves being grounded in what is feasible now. This need not mean that some of these targets could not be possible in the future, but there are necessary preconditions. Some of this sectors require high specialisation and, thus, we need to train the youth to develop human capital equipped to do so (e.g. marine biotech). We need to focus on what are current conditions of the country and decide what is feasible for now and start getting ready for the future.

This takes us to what we find positive. La'o Hamutuk considers the diversification of the economy critical for our future, to develop to enable better lives for our people. There are good ideas here, these are, options to explore to create a better plan. We want to be part of this and assist in the process. We will delve into we consider is missing in the proposal as it is in the following sections. Additionally, we will pitch ideas;

we will pitch alternative sectors that we consider more adequate for this proposal. This thinking is based on the notion that our ecosystems are interconnected and these alternative sectors have implications for our blue spaces. We have included also specific feedback to illustrate our argument that the proposal requires more thought, but, precisely due to this idea, La'o Hamutuk's recommendation is to redraft the policy and make significant changes.

The scope of this proposal requires to be brought down to earth; this implies narrowing down the number of target sectors and specifying what are the ingredients to successfully enable the diversification of our economy and how to use them in the right measure and order. This will require significantly more detail, which, in turn, will necessitate experts in different fields to assist in devising the plan. We think that this is the best option and we are available to provide more feedback in the future. In any case though, we consider that there are good opportunities within this draft, that there are encouraging signs.

*** No more than 3 pages (attach additional pages).*



2. General gaps on the Blue Economy: Policy and Action Plan for the Promotion of a Resilient and Sustainable Economy of the Sea in Timor-Leste

To illustrate these and other points we will use sections of the proposal to illustrate, but more feedback as to what our view on every single sector is can be provided.

We consider there two broad categories of gaps. The first one relates to the noticeable lack of actual detail and the second one relates more broadly to missing sectors.

The plan to plant 1 million trees per year illustrate the absence of actual concrete planning details. The first issue resides in the fact that the plan reads like a continuation of carbon offset projects, whose effects as a project of mitigation we contest. But beyond that, it is not concrete enough. There is a myriad of questions to be asked and answered by politicians and hired experts alike. Where will these be planted? What species? What scientific considerations will be taken into account prior to the plan? Will the ecosystems be researched to choose the suitable options for climate and fauna of the target areas? Will local people be consulted? What are the implications of this on how people can use land? What are the benefits will contribute to job creation and to existing livelihoods?

This vagueness, ever-present in the document, warrants concern and make us doubt whether any plan will be ultimately implemented. Indeed, there are a series of problems with the sheer number of components to this plan from logistical as there are not enough resources for every component of this proposal, to procedural, as there is a chance that the wide array of targets has diverted attention and focus from every target, stripping them of more detail and specification of what and how to get to planned outcomes. This is a serious issue because the logistics can be discussed and tweaked to make the plan more feasible, but without diligence and a thorough approach to every element of the plan, the outcomes will not be delivered. The right questions must be formulated; questions regarding the who, when, what and how. And even more important is to ask why?

Even with the options that are more promising - we highlight three: fisheries, tourism and transport – there are gaps with respect to the answers to these questions.

The fisheries sector is a great option considering current conditions, but a plan of this level of complexity requires much more detail. Developing our fisheries to export but mainly to attend to the nutrition of our people requires infrastructure and training, as well as social program to introduce fish into people's diets.

There are many questions to ask. We can list here some of them to illustrative the number of considerations that are critical.

How to increase our fishing capacities? Is there a need for training? What types of fishing practice will be taught? Are there more abilities they need? Are they going to learn to

recognize different species and signs of depletion in them? Will they learn and reconnect with indigenous practices?

Will we build vessels? What kind of vessels? What will be the allocation of fishing areas? Will the fishermen and women collaborate in a cooperative or will they have their own operation? Should we allocate one type of fish to each person in order for them to be specialized?

What limits will be established to fishing? What practices will be banned? Will there be an organism in charge of overseeing fishing? What will its structure be? Will it coordinate the fishermen and women activities or leave them be? Will it organize the processing of fish? Will there be conflict resolution mechanism?

Will processing and storage infrastructure be built? Where will it be built?

What will the management of aquaculture be like? What model of aquaculture will be used? Will the plan follow Norwegian and Scottish model of aquaculture? Or will the inspiration be the loko kuapa ponds in Hawaii? Will there be mechanism to control potential sanitation problems? What will be the response to maladaptive behavior?

What about the diets of the Timorese? The diets of the Timorese were changed by colonization. How will fish be encouraged among the population?

All these matters require attention, but these are just some of the critical considerations. This hints at how much attention each sector requires. To determine what kind of abilities fishermen and women require for the job, there should be research on what is required for fishing to be sustainable and functional, this is, research to determine how much and what can be fished, when and how. Once this is done, there is the matter of training, to enable workers to establish objectives and process information in the environment to operate according to it, they need training in marine biology, climate, chemistry, math, navigation and depending on what kind of vessel there might be more abilities to teach. For sure, some of them might have learned instinctively some of these, but when a government has the intention of building up industries to create jobs, there have to be specific plans that check whether there are people that are ready to take on the jobs adequately, especially in the context of sustainability.

We emphasize this to illustrate that it is not enough to say things will be done, plans have to lay out how things will be done.

Furthermore, we have noticed the little of emphasis on sectors based on land. Considering the interconnectedness of ecosystems and also the opportunities present in Timor-Leste we wonder why there has not been more attention to these promising sectors. Specifically, we are talking about environmental degradation adaptation and mitigation infrastructure and sustainable agriculture.

This is a rough idea or a sketch of a sector we consider promising.

Timor-Leste is in an especially vulnerable position against climate change. In addition to the obvious sea level rise impacting SIDS all around, volatile weather patterns and changed climate mean that flooding and drought events are more frequent and intense due to increased, but less frequent precipitation and dryer periods. This toggle between disturbed La Niña and El Niño weather raises several serious issues relating to water and soil. In a nutshell, repeated cycles of intensified drought and flooding have a nefarious effect on soil qualities by reducing organic matter and disturbing microbial life, which means soil compacts and experiences erosion. These change the structure of soil, which reduces its capabilities to absorb, filter and hold water which in turn decreases groundwater recharge and depletes the water table. Flooding also causes nutrient leaching and soil waterlogging, further disrupting soil health. The risks of flooding are also evident in the effects of rivers and streams on the wetland ecosystems as featured in the water resources section of this proposal.

As for the urban lived space, flooding increases the risk of water contamination; there is an increased chance of spreading pollutants, pathogens, and sewage into water supplies. This leads to outbreaks of waterborne diseases and creates habitats for vectors of diseases such as dengue or chikungunya. These are serious public health risks that can have a big impact on wellbeing, particularly in vulnerable communities. Additionally, there is a risk that with flooding the sewage will also spill into the sea and ocean.

Together, this dual hazard creates a feedback loop which, with time, compounds its effects and devastates the environment and human communities. Basically, degraded soils and altered water cycles increasingly worsen environmental and human health outcomes. This is a dangerous future and there is a chance to do something about it.

The development of this sector would contribute to Timor-Leste's preparedness and its population's wellbeing. Some cities in the world, so-called 'sponge cities', are building a set of grey and green infrastructure to increase their resilience to flooding events. They are designed to manage stormwater and reduce flooding. Grey infrastructure includes underground drainage pipes, urban storage tanks and deep tunnel systems, among others. They are designed to quickly channel stormwater to prevent surface flooding. In turn, green infrastructure refers to permeable pavements, gardens wetlands, bioswales and green roofs, among other elements. These elements absorb, slow and filter rainwater and lead to groundwater recharge. The combination creates urban areas more resilient to extreme rainfall and drought, improving liveability and reducing flood damage risk by mimicking natural hydrological processes.

Targeting this sector could greatly benefit the Timorese and could create human capital comparative advantages in the future, considering this is a global issue. By taking on these

infrastructure projects several issues can be addressed, including public health risks and marine ecosystem balance, among other things like job creation, resilience and the diversification of the economy.

The risk is that this will definitely require foreign assistance in training and in expertise for the projects. Still, there are actors out there who could be potential benevolent partners and, if done right, the result would be developing critical infrastructure for a time of climate change and a niche human capital comparative advantage. By asking the right questions and designing a thorough plan, this could deliver wellbeing to the Timorese people in different dimensions.

The opportunity relates also to the fact that the gray sanitation infrastructure of Timor-Leste is quite basic, so there would be few sunk costs considering that, especially, there are improvements to be made in sanitation infrastructure and practice.

Finally, illustrative of the power of consultation is the perspective that is developing in coastal areas. People are interested the field of agriculture; local communities are interested in developing it and sustainable options can be imported to Timor-Leste to simultaneously develop the local economy and attend to local needs, such as child nutrition. In this line, water conservation technologies such as the ones mentioned above and some small scale options that are already in place can be paired with it and further protect the sea. This would also eliminate the need to develop desalinisation plants which use energy that can be utilised for other purpose instead. Perhaps emergent properties would emerge, like the potential for exports of surplus of food at some point in time, which would enable using the extra income to reinvest in more complex industries in the future.

We have not included much specific feedback as La'o Hamutuk considers that, while there is material to work with in this proposal, there is work to be done. We will give more specific feedback if asked in advance, but we think that there is little to discuss considering the existing degree of detail. In other words, as a big percentage of the contents here could mean one thing or another, we consider that we cannot comment much without more defined plans. However, there are some comments on things we consider problematic and these are included below.

**** No more than 3 pages (Attach additional pages).**



Specific Feedback

Section Page	Comment	Suggested change (include source or reference)
Page 34	<p>The implicit message here is nefarious. Blaming subsistence farmers for poor agricultural practices misses a big portion of the story. Especially considering the loss of culture and indigenous practices derived from colonialism and the role of Monsanto in the post-independence period. Also, there is little support for them to develop better practices.</p>	<p>Do actual research on the state of agriculture in rural areas of the country and develop a better understanding of the causes of environmental, including historical factors leading to these practices and proposal to improve them. Again, subsistence farming corresponds to 65% of the population.</p>
Page 51	<p>The matter of space is critical everywhere, but especially in island states. There is limited surface area and land use should be given extensive thought, especially when the purpose is to enclose space.</p> <p>We need maps which depict the proposal for protected areas. This will enable understanding the implications of creating such areas.</p> <p>There is also the issue of defining a protected area. Indigenous knowledge worldwide proves that fencing natural spaces can be detrimental to ecosystem balance. There is a way to live embedded in environment, this means there could be agroecology tenures in these protected areas. We need to define what protection is and our understanding needs to be rooted in a deep understanding of local ecologies.</p>	

Page 62	<p>This is an instance of a measure that is incompatible with sustainability.</p> <p>The Suai port should not be planned to serve the oil sector.</p>	<p>This measure should either be scrapped or be redesigned for other purposes</p>

**** No more than 3 pages (attach additional pages).**

Additional Clarifications (maximum 3 questions)

How will the rights, interests and voices of the people (e.g. small-scale fishers) be included and respected to develop an equitable and inclusive blue economy? This is critical in our view.