



Same Norms, Different Frameworks: Tracing the Diffusion and Instrumentation of Some International Conservation Standards in Myanmar and Thailand

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Executive Summary

Protected areas (PAs) remain the most important mechanism in the conservation of biodiversity worldwide, but persistent governance gaps undermine their effectiveness across Southeast Asia. This policy brief assesses how international conservation standards have diffused into Myanmar and Thailand's PA governance frameworks, and what specific policy instruments each country has deployed in response, drawing on Policy Diffusion Theory and Policy Instruments Theory.

The analysis finds that both countries have absorbed international norms primarily through coercive and emulative diffusion mechanisms, with coercive diffusion generating stronger legislative instrumentation than emulative diffusion in both cases. Both countries demonstrate formal convergence with international standards at the definitional and target commitment level, yet persistent instrument gaps remain in governance quality, Free, Prior, and Informed Consent (FPIC) operationalization, and participatory approach application. Thailand demonstrates stronger norm currency through its more recent National Biodiversity Strategy and Action Plan (NBSAP) and explicit Other Effective Area-based Conservation Measures (OECMs) integration, while Myanmar's consolidated legislative framework offers greater definitional coherence and a more traceable pathway from planning commitment to legislative operationalization.

Based on these findings, this brief recommends that Myanmar revise its NBSAP to reflect the Kunming-Montreal Global Biodiversity Framework (KM-GBF), diversify its PA category system, and strengthen cross-sectoral coordination. Thailand is recommended to consolidate its fragmented legislative framework and strengthen substantive rights-protection provisions. Both governments are recommended to operationalize participatory governance through pilot programs delegating management authority to indigenous and local communities.

I. Problem Statement

Protected areas (PAs)¹ remain the cornerstone of global biodiversity conservation, however, their capacity to deliver conservation outcomes is increasingly questioned. Since the adoption of the Convention on Biological Diversity (CBD) in 1992, international conservation frameworks have proliferated — culminating most recently in the KM-GBF, which commits signatory states to protect 30% of terrestrial and marine ecosystems by 2030 (CBD, 2022). Transnational conservation organizations including International Union for Conservation of Nature (IUCN), and World Wide Fund for Nature (WWF) have reinforced these commitments by codifying international standards, producing technical guidelines, and facilitating compliance mechanisms across jurisdictions (Dudley, 2008).



Photo- 1: Doi Inthanon National Park, Thailand.

Despite this sustained international effort, evidence from Southeast Asia suggests a persistent gap between formal policy targets and governance outcomes. Only 45% of recently designated PAs in the region effectively mitigate wildlife loss — with ineffectiveness linked to governance and management factors rather than biophysical conditions (Sreekar et al., 2024). An additional USD 17 million annually is estimated to be required to strengthen PA

¹ A protected area is ‘a clearly defined geographical space, recognized, dedicated and managed, through legal or other effective means, to achieve the long-term conservation of nature with associated ecosystem services and cultural values’ (Dudley, 2008)

management effectiveness across the region alone (Sreekar et al., 2024). Poor management practices, limited funding, and insufficient integration of socio-ecological goals continue to undermine PA systems despite expanding coverage (Negacz et al., 2022; WWF, n.d.), with institutional performance and financial constraints identified as primary determinants of governance outcomes (Herse et al., 2024; Vandergeest & Peluso, 1995).

Myanmar and Thailand exemplify this challenge. Both countries share colonial-era institutional origins in British-influenced forestry administration, are signatories to CBD, and host major international conservation NGO operations. Moreover, two countries established their first PA (especially Pidaung Wildlife Sanctuary in 1920, Khao Yai in 1962) prior to the proliferation of the global conservation standards. This raises a fundamental policy question: if both Myanmar and Thailand have been subject to sustained international conservation norm diffusion through broadly similar channels — treaty obligations, donor conditionality, and transnational NGO technical assistance — how do their protected area governance frameworks reflect international standards unevenly, and what specific policy instruments have each country deployed in response to these norms?



Photo- 2. Namtok Pha Charoen National Park.

Tak, Thailand.

II Conceptual Framework and Methodology

This policy brief draws on two complementary analytical frameworks. Policy Diffusion Theory (Dobbin et al., 2007; Simmons et al., 2006) provides the macro-level lens for examining how and through which mechanisms — coercion and emulation — international conservation standard transmits to national governance frameworks. Policy Instruments Theory (Howlett, 2019; Martin Lodge, 2007) offers the meso-level lens for examining what specific governing tools states deploy in response, distinguishing between nodality, authority, treasure, and organization instruments, and between substantive and procedural instrumentation. Together, the two frameworks analyse not only how norms diffuse but what form they take upon arrival in national policy frameworks.

The analysis is based on systematic document analysis of primary sources including national legislations, and NBSAPs, from both countries covering 1992 to 2024. This include Myanmar's National Biodiversity Strategy and Action (2015-2020), The Conservation of Biodiversity and Protected Areas Law (CBPA Law 2018), the Thailand's National Biodiversity Action Plan (2023- 2027), the

National Parks Act (2019), and the Wild Animal Conservation and Protection Act (2019). Limitations include English-language document bias, restricted data accessibility in Myanmar due to current political conditions, and documentary asymmetry between the two cases.

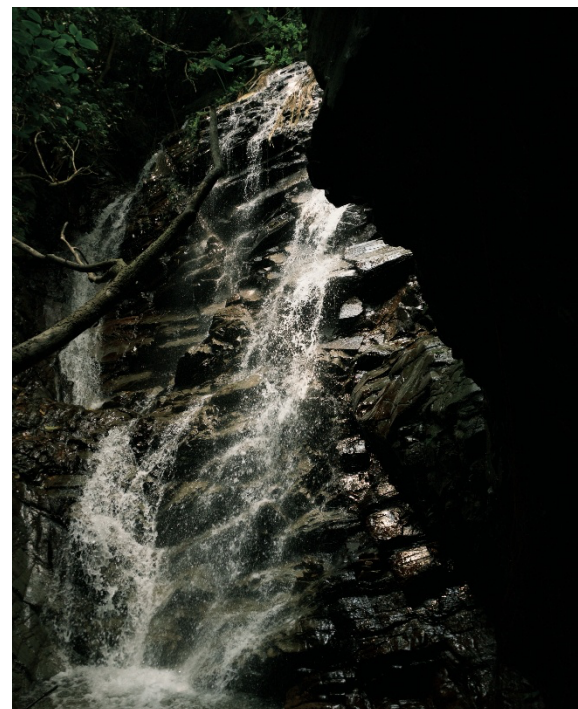


Photo 3. Taksin Maharat National Park, Tak, Thailand.

III. Analysis of Standard Diffusion and Instrumentation

A. Definitional Alignment with IUCN standard such as Protected Area Definition & OECMs

<i>Myanmar</i>	<i>Thailand</i>
- Myanmar adopts a legal PA definition under the Conservation of Biodiversity and Protected Areas Law (CBPA Law) (2018) reflecting spatial, biophysical, and governance dimensions of the IUCN standard, yet omitting temporal, socio-cultural, and economic considerations — specifically 'long-term' conservation, 'cultural values', and 'ecosystem services' (MONREC, 2018) (Dudley, 2008). - Section 2 further disaggregates the IUCN framework into technical terms including ecosystem, buffer zone, and core zone, indicating emulative localization of international vocabulary without full normative translation. - PA governance is consolidated under a single authority instrument through the CBPA Law administered by the Forest Department (FD) under MONREC. - Myanmar's NBSAP (Forest Department, 2015) and legal documents contain no reference to OECMs, representing a complete instrument gap attributable to temporal diffusion lag — its NBSAP predates CBD Decision 14/8 (2018) and has not been revised accordingly (CBD, 2018).	- Thailand's NBSAP (2023–2027) echoes the IUCN definition without formally adopting it, deploying the broader term 'conserved area' across five legislations (Office of Natural Resources and Environmental Policy and Planning Ministry of Natural Resources and Environment, 2024). - Section 4 of the National Parks Act (2019) (Office of the Council of State, 2019) and Section 47 of the Wild Animal Conservation and Protection Act (2019) (Office of the Council of State, 2019) mirror biophysical, spatio-temporal, socio-cultural, economic, and governance dimensions of the IUCN standard — a more comprehensive definitional alignment than Myanmar's — though the absence of a unified statutory definition across five legislations produces instrument fragmentation limiting coherent governance application. - On OECMs, Thailand explicitly integrates the concept into NBSAP Target 2 — demonstrating post-2018 norm currency through coercive diffusion under GBF reporting requirements — but prescribes no sector-wise coordination



	mechanism or institutional arrangements for OECM designation in practice, reflecting procedural adoption without substantive instrumentation.
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B. Emulative Adoption of IUCN PA Management Categories

Both countries recognize seven national PA types² that loosely follow the IUCN six-category system, yet both show classification misalignment — IUCN records 53 PAs against Myanmar's 45 nationally designated, and 241 against Thailand's 219 (UNEP-WCMC, 2026a, 2026b). In Myanmar, wildlife sanctuaries and national parks constitute 91% of all PAs, reflecting single-objective conservation orientation and limited category adaptation. Notably, Myanmar's NBSAP Target 11.1 and 11.2 committed to integrating Indigenous Community Conserved Areas (ICCAs), IUCN management categories and governance type into national frameworks — subsequently operationalized through CBPA Law (2018) inclusion of community conserved protected areas — demonstrating a sequential coercive diffusion pathway producing substantive authority instrumentation. Thailand similarly concentrates 81% of PAs in national parks and wildlife sanctuaries, with just 10% under IUCN Categories V–VI recognizing sustainable use objectives, consistent with emulative adoption of internationally visible designations over the full typological range.

C. Limited Distribution of Management Authority over PA

Both countries maintain overwhelmingly state-centric governance — 220 of 241 PAs in Thailand and 51 of 53 in Myanmar under direct government control (UNEP-WCMC, 2026a, 2026b). Myanmar's CBPA Law embeds participatory governance provisions including community-based management (Section 13e) and co-management approaches (Section 13g) directly into legislation. Thailand's participatory governance appreciation remains limited to NBSAP planning text without legislative extension — making it a weaker nodality instrument

² Myanmar's CBPA Law (2018) categorizes the country PAs into 7 types, namely 1) Scientific Reserve; 2) National Park; 3) Marine National Park; 4) Nature Reserve; 5) Wildlife Sanctuary; 6) Geo-features Significant Area; 7) Community Conserved Protected Area. Thailand's NBSAP (2023- 2027) recognizes 7 types such as 1) national parks, 2) forest parks, 3) wildlife sanctuaries, 4) non-hunting areas, 5) marine and coastal protected areas, 6) environmental protected areas, and 7) aquatic animal sanctuaries.

than Myanmar's legislative enabling provisions, though neither country has restructured organizational arrangements in practice.



Photo 4. Khun Nan National Park, Nan, Thailand.

D. Governance Quality and Free, Prior, and Informed Consent (FPIC)

Both countries demonstrate procedural legitimacy provisions — Thailand through public hearing requirements under the National Parks Act and Wild Animal Conservation and Protection Act, Myanmar through rights-investigation provisions under CBPA Section 9(e) — though Myanmar's provisions are more substantive, investigating affected rights rather than conducting procedural hearings only. Despite strategic commitments to biodiversity mainstreaming in both countries, policy coherence remains structurally limited — Myanmar's NBSAP includes cross-sectoral arrangements in only 8 of 21 relevant action points with majority being limited to 2 domains, while its National Steering Committee excludes government representatives from key sectors including agriculture and planning, and Thailand's NBSAP, though aligned across three levels of national development planning, fails to link PA effectiveness considerations with its policy integration targets or prescribe sector-wise coordination mechanisms for OECM site identification across different land tenure regimes.

Both countries have formally committed to PA management effectiveness through substantive instrument provisions — Myanmar's NBSAP prescribing five action points including SMART patrol systems and METT surveys, and Thailand's NBSAP stating three operative guidelines under Target 2 Measure 1 — reflecting genuine performance-oriented instrumentation that goes beyond procedural acknowledgement in both cases. Both countries exhibit weak accountability instrumentation — Thailand lacks differentiated role prescription in its PA legislation, while Myanmar's CBPA, though more detailed in role distribution, embeds no

independent oversight mechanism. FPIC is committed to in both NBSAPs — Myanmar under Target 18, Thailand under Target 10 — yet absent from operative legislative provisions in both cases, adopted as nodality instruments without authority or organization instruments to operationalize consent in practice.

E. Full adoption with limited instrumentation of Aichi Target 11/ GBF Target 3³

<i>Myanmar</i>	<i>Thailand</i>
• Myanmar's NBSAP reflects Aichi Target 11 across three adaptive sub-targets, with Target 11.2 generating the most significant legislative instrumentation through the CBPA Law. • Myanmar has not revised its NBSAP to reflect the Kunming-Montreal GBF, leaving a diffusion currency gap relative to Thailand's more recent GBF alignment.	• Thailand directly mirrors GBF Target 3 at 30% without domestic calibration — signalling coercive and emulative adoption with limited substantive instrument development to deliver the commitment.

³ Aichi Target 11 required CBD parties to protect at least 17% of terrestrial areas through ecologically representative and effectively managed PA systems by 2020(CBD COP, 2010), and its successor, GBF Target 3, expands this to 30% of terrestrial and marine areas by 2030 with explicit requirements for ecological representativeness, connectivity, equity, and integration of OECMs (CBD, 2022).

IV. Divergent Paths, Shared Gaps: Comparing Norm Diffusion and Instrumentation in Myanmar and Thailand

Both Myanmar and Thailand have absorbed international conservation norms through coercive and emulative diffusion mechanisms, though with different intensities and outcomes. Coercive diffusion — operating through CBD reporting obligations and GEF grant support— has proven more effective at generating substantive instrumentation in both cases. Myanmar's sequential translation of NBSAP Target 11.2 into the CBPA Law (2018) represents the clearest coercive pathway, demonstrating that reporting obligations can produce substantive legislative instrumentation under specific conditions. Thailand's OECM integration under GBF reporting requirements similarly reflects coercive diffusion, though without substantive organizational follow-through. Emulative diffusion is equally present but consistently produces weaker instrumentation — norms adopted for legitimacy signalling remain predominantly at the nodality level. Thailand's emulative diffusion is sustained and legitimacy-driven, while Myanmar's is more episodic, reflecting periodic rather than continuous international engagement.

Assessed against IUCN and CBD standards, both countries demonstrate formal convergence at the definitional and target commitment level alongside substantive divergence at the instrumentation level. PA governance remains overwhelmingly state-centric in both cases, and category systems are dominated by restrictive types over the full IUCN typological range. The most significant divergence lies in norm currency and legislative depth — Thailand's more recent NBSAP demonstrates stronger post-2018 norm absorption, while Myanmar's consolidated legislative framework offers greater definitional coherence and a more traceable coercive diffusion pathway from planning commitment to legislative operationalization. Across both cases, FPIC and participatory governance represent the most persistent shared instrumentation gaps — acknowledged in planning documents but absent from operative legislative provisions in both countries.

V. Recommendations

Based on the findings, the following recommendations are proposed to strengthen PA governance in Myanmar and Thailand and contribute to global conservation efforts.

Government of Myanmar — Forest Department (MONREC)

- 1) Determine working definitions for each PA category under the CBPA Law (2018) to realize the operational utility of the consolidated definitional framework and establish clear management and conservation objectives per category
- 2) Diversify PA designation by incorporating a broader range of PA types with differentiated management objectives, moving beyond single-objective orientation dominated by wildlife sanctuaries
- 3) Expand cross-sectoral representation — including agriculture and land use planning — within the existing National Steering Committee to strengthen conservation policy coherence across relevant sectors
- 4) Revise the NBSAP to reflect the Kunming-Montreal GBF and incorporate OECMs as a recognized conservation measure, addressing the current diffusion currency gap

Royal Thai Government

- 1) Adopt an umbrella legal term for protected areas to consolidate governance across five separate legislative instruments and facilitate OECM site identification across different land tenure regimes
- 2) Amend the National Parks Act (2019) and Wild Animal Conservation and Protection Act (2019) to incorporate substantive rights-protection provisions for affected stakeholders and prescribe differentiated roles and responsibilities in PA governance

***Both Governments***

- 1) Design and implement pilot programs delegating management authority to non-state actors including indigenous and local communities in selected PAs, moving beyond enabling legislative provisions toward operational participatory governance
- 2) Strengthen the existing funding mechanisms for PAs management practices to ensure its effectiveness while devising new financial instruments for expanding its network of ecologically-representative and sound PAs and OECMs in fulfilling the national target made under Aichi Target and GBF Target.





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