

ANNEX A: LIST OF DEVELOPING COUNTRIES PARTICIPATING IN THE UN-REDD PROGRAMME AND THE FCPF



Potential REDD+ country	UN-REDD Programme	World Bank FCPF	UNCAC	Inter-American Convention Against Corruption ¹³⁰	African Convention on Preventing and Combating Corruption ¹³¹
Ratification, acceptance, approval, accession, succession					
Africa					
Democratic Republic of the Congo	Yes- Pilot ¹³²	Yes	No		Signed 2003, but not ratified
Cameroon		Yes	2006		Signed 2008, but not ratified
Central African Republic	Yes	Yes	2006		No
Equatorial Guinea		Yes	No		Signed 2005, but not ratified
Ethiopia		Yes	2007		2007
Gabon	Yes	Yes	2007		2009
Ghana		Yes	2007		2007
Kenya	Yes	Yes	2003		2007
Liberia		Yes	2005		2007
Madagascar		Yes	2004		2004
Mozambique		Yes	2008		2006
Nigeria	Yes		2004		2006
Republic of Congo	Yes	Yes	2006		2006
Sudan	Yes		No. Signed in 2005, but not ratified		Signed 2008, but not ratified
Uganda		Yes	2004		2004
United Republic of Tanzania	Yes- Pilot	Yes	2005		2005
Zambia	Yes- Pilot		2007		2007
Sub-total = 17	9	14	Not ratified: 3		Not ratified: 5

130 Source: www.transparency.org/global_priorities/international_conventions/conventions_instruments/oas_convention, accessed on 22 October 2010.

131 Source: www.africa-union.org/root/au/Documents/Treaties/List/African%20Convention%20on%20Combating%20Corruption.pdf, accessed on 22 October 2010, list dated 6 August 2010.

132 'Pilot' means that the country in one of the 9 initial pilot countries eligible to receive funding under the UN-REDD Programme to develop and implement a national REDD+ strategy.



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				Ratification, acceptance, approval, accession, succession		
Asia - Pacific						
	Bangladesh	Yes		2007		
	Bhutan	Yes		Signed (2005) but not ratified		
	Cambodia	Yes	Yes	2007		
	Indonesia	Yes - Pilot	Yes	2006		
	Lao People's Democratic Republic		Yes	2009		
	Nepal	Yes	Yes	No. Signed in 2003, but not ratified.		
	Papua New Guinea	Yes- Pilot	Yes	2007		
	Philippines	Yes		2006		
	Solomon Islands	Yes		No		
	Sri Lanka	Yes		2004		
	Thailand		Yes	No. Signed in 2003, but not ratified.		
	Vanuatu		Yes	No		
	Viet Nam	Yes- Pilot	Yes	2009		
	Sub-total = 13	10	8	Not ratified: 5		
Latin America - Caribbean						
	Argentina	Yes	Yes	2006	1997	
	Bolivia	Yes- Pilot	Yes	2005	1997	
	Chile		Yes	2006	1998	
	Colombia	Yes	Yes	2006	1998	
	Costa Rica	Yes	Yes	2007	1997	
	Ecuador	Yes		2005	1997	
	El Salvador		Yes	2004	1998	
	Guatemala	Yes	Yes	2006	2001	
	Guyana		Yes	2008	2000	

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				Ratification, acceptance, approval, accession, succession		
	Honduras		Yes	2005	1998	
	Mexico	Yes	Yes	2004	1997	
	Nicaragua		Yes	2006	1999	
	Panama	Yes- Pilot	Yes	2005	1998	
	Paraguay	Yes- Pilot	Yes	2005	1996	
	Peru		Yes	2004	1997	
	Suriname		Yes	No	2002	
	Sub-total = 16	9	15	Not ratified = 1	Not ratified = 0	
	Total countries = 46	29	37	Not ratified = 9	N/A	N/A



ANNEX B: MAP OF CORRUPTION RISKS IN CLIMATE CHANGE ADAPTATION AT THE COUNTRY LEVEL

Activity	Actors involved		Corruption threat	Corrupt practice	Risk assessment
	Demand side	Supply side			
Planning and Setting Priorities for Adaptation					
Consultation with stakeholders	Political elite Officials	Landowners Consultants Engineers Suppliers NGOs	State capture	Extortion, solicitation and clientelism by officials, e.g. ■ Vested interests given unfair access to decision-makers ■ Information released selectively Bribery, fraud and collusion by groups seeking favourable treatment, e.g. ■ Promoting adoption of particular technologies or methods ■ Seeking preference for particular properties or regions	Medium - High risk
Identification and prioritisation of adaptation actions	Officials Ministers Political elite	Landowners Officials Consultants Engineers Suppliers NGOs	State capture leading to poor planning, reducing capacity to respond to climate change and build resilience to future impacts	Bribery, patronage, nepotism and clientelism , e.g. ■ Selection of projects, properties and technologies favouring vested interests Abuse of discretion to prioritise activities that maximise potential for rent-seeking, e.g. ■ Capital-intensive infrastructure projects over ecosystem-based adaptation and community-based management ■ Complex licensing and regulatory systems	Medium risk

ANNEX B: MAP OF CORRUPTION RISKS IN CLIMATE CHANGE ADAPTATION AT THE COUNTRY LEVEL



Activity	Actors involved		Corruption threat	Corrupt practice	Risk assessment
	Demand side	Supply side			
Implementation of Adaptation Programmes and Projects					
Project, programme and regulatory design	Ministers Political elite Officials	Landowners Engineers, construction and other consultants	State capture, abuse of discretion Inefficient use of resources, failure to build resilience, maladaptation	Bribery, nepotism, clientelism and cronyism , e.g. ■ Preference to adaptation activities favoring vested interests, rather than areas of greater vulnerability ■ Weak enforcement of environmental impact assessment procedures and other regulatory requirements Abuse of discretion to develop rules that will enable rent-seeking in the implementation of funds, e.g. ■ Complex projects and regulatory systems with high levels of discretion that may be used to seek kickbacks from contractors or to siphon funds for other purposes Fraud, theft and collusion , e.g. ■ Seeking funding for identical results through different adaptation programmes/projects ■ Corporate interests seeking adoption of particular technologies	Medium - High risk



ANNEX B: MAP OF CORRUPTION RISKS IN CLIMATE CHANGE ADAPTATION AT THE COUNTRY LEVEL

Activity	Actors involved		Corruption threat	Corrupt practice	Risk assessment
	Demand side	Supply side			
Procurement	Ministers Political Elite Officials Contractors and Consultants	Engineers Construction Consultants	Poor quality, incomplete projects, inefficient use of resources, failure to build resilience, maladaptation	Bribery, solicitation, nepotism, clientelism and cronyism, e.g. ■ Tailoring of project requirements to suit particular bidders ■ Over-stating project requirements ■ Inadequate advertising, short bidding times to enable officials to solicit bribes for information and contract awards ■ Withholding information/ access to tender process, charging for information/ access ■ Weak enforcement of contract requirements, environmental impact assessment and regulatory requirements Collusion between industry stakeholders, particularly engineering and construction firms, e.g. ■ Pre-agreement on prices, contract conditions Theft, fraud and embezzlement, e.g. ■ On-selling of equipment ■ Over-billing ■ Siphoning of project funds ■ Concealing substandard work ■ Providing sub-standard equipment, drugs, food and water	Medium risk
Appointment of staff and committee members	Political Elite Officials Industry	Ministers Political Elite Officials	Reduced capacity to respond to adaptation needs and build resilience	Favouritism, nepotism, clientelism and cronyism, e.g. ■ Officials grant favourable roles to their friends, families and business associates Bribery and solicitation, e.g. ■ 'Buying' and 'selling' certain roles with high rent-seeking potential	High risk

ANNEX B: MAP OF CORRUPTION RISKS IN CLIMATE CHANGE ADAPTATION AT THE COUNTRY LEVEL



Activity	Actors involved		Corruption threat	Corrupt practice	Risk assessment
	Demand side	Supply side			
Service delivery	Officials Contractors Transporters	Industry Households Irrigators	Petty corruption inflating the cost and reducing the quality and accessibility of services	Bribery, extortion and solicitation, e.g. ■ Extra-legal charges for connections, services, deliveries, expediting repairs and processing licence applications ■ Over-billing to enable officials to obtain bribes to revise bills Theft and fraud, e.g. ■ Illegal on-selling of food, medicines and other equipment ■ Illegal connections to supplies ■ Diversion of maintenance funding Bribery, nepotism and clientelism, e.g. ■ Weak enforcement of regulations and allocations ■ Preferential treatment in licensing and allocations for certain industries or regions	High risk



ANNEX C: UNCAC AS AN ANTI-CORRUPTION FRAMEWORK FOR ADAPTATION

The table below provide an example of UNCAC might be used as an anti-corruption framework to guide anti-corruption measures in adaptation.¹³³

UNCAC		Implications for adaptation planning
Article	Obligation on State	
Chapter II - Preventive measures		
Article 5: Anti-corruption policies	To develop, implement and maintain effective and coordinated anti-corruption policies that promote participation, transparency and accountability	Is the country a party to UNCAC and if it is a dualist country has it implemented anti-corruption legislation? Does adaptation planning consider the country’s anti-corruption legislation, policies and guidelines? Does adaptation planning at the national and local level involve participation of climate change affected communities? Is the adaptation planning process transparent and is it done by a range of government bodies or departments (eg water, fisheries, planning, coastal, health departments)? Is there a central body that reviews national adaptation plans before they are sent out to the UNFCCC? Can local communities review or comment on government decisions at each of the adaptation planning stages? How is adaptation financing and ODA administered by the government and are there anti-corruption policies dealing with this? Which government department is held accountable to international funding bodies for use of the adaptation funds?
Article 6: Preventive anti-corruption bodies	To establish an independent body or bodies (eg corruption commissions, Corruption Court) to implement anti-corruption policies and to disseminate knowledge on corruption prevention	Is there an independent corruption body established? If so, do adaptation planning activities and adaptation financing fall within the remit of relevant corruption bodies? Do these bodies consider that climate change adaptation is an area that could be ripe for corruption in such country and are they aware of the risks? Can the corruption bodies review the administration of adaptation planning and financing by the relevant government bodies?
Article 7: Public sector	To adopt, maintain and strengthen systems for the recruitment, hiring, retention promotion and retirement of civil servants ... that include training of individuals for public positions considered especially vulnerable to corruption to enhance their awareness of the risks of corruption.	Are civil servants that undertake adaptation assessment and planning required to undergo training and does this training include anti-corruption training? Are there any civil servants currently involved in adaptation planning that have a history of corrupt activities? Are civil servants experienced in the administration of ODA?

¹³³ The idea for this table was drawn from UNDP Anti-corruption Guidance Note (2008), p 9, Table 3 which contains a table setting out "UNCAC as a democratic governance and development framework".

ANNEX C: UNCAC AS AN ANTI-CORRUPTION FRAMEWORK FOR ADAPTATION



UNCAC		Implications for adaptation planning
Article	Obligation on State	
Article 8: Codes of conduct for public officials	To apply codes or standards of conduct to encourage the proper performance of public functions, to facilitate reporting by public officials of acts of corruption, and to require public officials to declare conflicts of interest	Does the country have any codes or legislation in place dealing with corruption? Is there whistle-blowing legislation in place or a culture of whistle-blowing for acts of corruption? Are there any conflicts of interest between public officials' private interests (eg company shareholdings, family businesses) and the public adaptation planning? Further, is there training on conflicts of interest and procedures in place for dealing with conflicts of interest when they arise?
Article 9: Public procurement and management of public finance	To take steps to establish appropriate systems of procurement, based on transparency, competition and objective criteria. To take measure to promote transparency and accountability in the management of public finances.	Is there a process in place to deal with the procurement of contracts for infrastructure projects and delivery of public services? Is there a transparent bidding process for infrastructure projects and delivery of public services? Are the public able to review decisions made for procurement and are state finances audited and available for public review and comment?
Article 10: Public reporting	To take measures to adopt procedures or regulations allowing members of the public to obtain information on the organization, functioning and decision-making processes of public administration. Publishing information on the risks of corruption in public administration.	Are adaptation planning processes transparent, allowing local communities to participate and raise concerns at relevant stages of the decision-making process (eg coastal adaptation planning should consult coastal communities)? Can communities obtain public information on adaptation planning and are they provided with information and education regarding the process (including in non-internet based formats as many poor communities may not have internet access)? Are any publications on the risks of corruption in the public sector provided to local communities?
Article 11: Judiciary and prosecution services	To take measures to strengthen integrity and to prevent opportunities for corruption among members of the judiciary, e.g. through rules of conduct	Is there corruption within the judiciary and are there possible conflicts of interest between members of the judiciary and adaptation planning projects (eg where a member of the judiciary may have businesses/ contacts in adaptation infrastructure projects)? Are adaptation planning decisions subject to judicial review and if so, are there guidelines for review? Are the judiciary educated about the corruption risks involved with adaptation planning?
Article 12: Private sector	To take measures to prevent corruption involving the private sector.	Are there codes and/or legislation developed to ensure adaptation planning is not subject to corrupt practices at both the international, national and local levels? Do companies and contractors operating within the country have internal codes of conduct that prevent corrupt practices and if so, are these codes enforced? Are foreign companies and contractors that may be involved in adaptation activities (e.g. instalment of infrastructure) parties to UNCAC and do they have adequate and enforceable codes and/or legislation?



ANNEX C: UNCAC AS AN ANTI-CORRUPTION FRAMEWORK FOR ADAPTATION

UNCAC		
Article	Obligation on State	Implications for adaptation planning
Article 13: Civil society	To promote the active participation of individuals and groups outside the public sector, such as civil society, non-governmental organizations and community-based organizations, in the prevention of and fight against corruption, e.g. by ensuring that the public has effective access to information.	Can the public freely participate in adaptation planning decisions and is there capacity-building for NGOs? Are NGOs and the press able to freely voice concerns over any adaptation planning decisions? Is there adequate, accurate and timely information regarding adaptation planning disseminated to the public and the press? Are NGOs and community-based organizations free from corruption?
Chapter III – Criminalization and law enforcement		
Article 15: Bribery of national public officials	To adopt legislation making it a criminal offence to bribe a public official to induce the official to act or refrain from acting in the exercise of his or her official duties.	Is there national legislation that makes bribery or such inducement of a public official illegal? If so, is such legislation adequately monitored and enforced?
Article 16: Bribery of foreign public officials and officials of public international organisations	To adopt legislation making it a criminal offence to bribe a foreign public official or an official of a public international organization to induce the official to act or refrain from acting in accordance with their duties.	Is there national legislation that makes bribery or such inducement of a foreign public official or public international organization illegal? If so, is such legislation adequately monitored and enforced?
Article 17: Embezzlement, misappropriation of property by public official	To adopt legislation establishing as criminal offences, the embezzlement, misappropriation or other diversion by a public official for his or her own benefit of property or funds entrusted to the public official.	Is there national legislation that makes it illegal for public officials to embezzle or misappropriate public funds? Also, is it clear that any adaptation funding is public funding and hence subject to this legislation?

ANNEX D: UNCAC AS AN ANTI-CORRUPTION FRAMEWORK FOR REDD+



The table below provide an example of UNCAC might be used as an anti-corruption framework to guide anti-corruption measures in national REDD+ strategies.¹³⁴

UNCAC		Implications for national REDD++ strategies
Article	Obligation on State	
Chapter II - Preventive measures		
Article 5: Anti-corruption policies	To develop, implement and maintain effective and coordinated anti-corruption policies that promote participation, transparency and accountability	National REDD+ strategy should address the legal framework, strategies and processes which will be used to address corruption in REDD+.
Article 6: Preventive anti-corruption bodies	To establish an independent body or bodies (eg corruption commissions, Corruption Court) to implement anti-corruption policies and to disseminate knowledge on corruption prevention	Does the national REDD+ strategy make provision to link REDD+ to the country's anti-corruption bodies? Are the anti-corruption bodies informed about REDD+ and prepared to implement anti-corruption measures and to take enforcement action if indications of corruption emerge in REDD+ activities.
Article 7: Public sector	To adopt, maintain and strengthen systems for the recruitment, hiring, retention promotion and retirement of civil servants ... that include training of individuals for public positions considered especially vulnerable to corruption to enhance their awareness of the risks of corruption.	Does the national REDD+ strategy address the need for civil service capacity building in the institutions who will be responsible for implementing REDD+ (Treasury, finance, department of Forestry, department of Lands/ Planning, etc)? Does the strategy include training for staff on the specific risks of corruption in REDD+?
Article 8: Codes of conduct for public officials	To apply codes or standards of conduct to encourage the proper performance of public functions, to facilitate reporting by public officials of acts of corruption, and to require public officials to declare conflicts of interest	Does the national REDD+ strategy identify whether the institutions responsible for implementing REDD+ have codes of conduct which are suitable for REDD+? If not, the strategy should identify the need to develop codes of conduct.
Article 9: Public procurement and management of public finance	To take steps to establish appropriate systems of procurement based on transparency, competition and objective criteria. To take measure to promote transparency and accountability in the management of public finances.	Does the national REDD+ strategy identify how REDD+ revenues will be administered in a manner that is transparent and accountable?
Article 10: Public reporting	To take measures to adopt procedures or regulations allowing members of the public to obtain information on the organization, functioning and decision-making processes of public administration. Publishing information on the risks of corruption in public administration.	Does the national REDD+ strategy include freedom of information provisions regarding decision making processes under REDD+, e.g. in relation to zoning decisions, applications for rezoning, REDD+ approvals, benefit distribution systems, enforcement action

¹³⁴ The idea for this table was drawn from UNDP Anti-corruption Guidance Note (2008), p 9, Table 3 which contains a table setting out "UNCAC as a democratic governance and development framework".



ANNEX D: UNCAC AS AN ANTI-CORRUPTION FRAMEWORK FOR REDD+

UNCAC		Implications for national REDD++ strategies
Article	Obligation on State	
Article 11: Judiciary and prosecution services	To take measures to strengthen integrity and to prevent opportunities for corruption among members of the judiciary, e.g. through rules of conduct	Does the national REDD+ strategy identify the corruption risk involving the judiciary? Does the strategy include prosecution guidelines? Does the strategy provide opportunities for judicial education on REDD+?
Article 12: Private sector	To take measures to prevent corruption involving the private sector.	Does the national REDD+ strategy address the risk of corruption from the private sector in REDD+? Does national legislation make it a criminal offence for private sector actors to engage in corrupt practices?
Article 13: Civil society	To promote the active participation of individuals and groups outside the public sector, such as civil society, non-governmental organizations and community-based organizations, in the prevention of and fight against corruption, e.g. by ensuring that the public has effective access to information.	Does the national REDD+ strategy provide for capacity building of NGOs engaged with REDD+? Does the strategy make provision for access to information?
Chapter III – Criminalization and law enforcement		
Article 15: Bribery of national public officials	To adopt legislation making it a criminal offence to bribe a public official to induce the official to act or refrain from acting in the exercise of his or her official duties.	Does the national REDD+ strategy identify whether such legislation is in place, and if not, recommend that such legislation be adopted as part of the REDD+ readiness process?
Article 16: Bribery of foreign public officials and officials of public international organisations	To adopt legislation making it a criminal offence to bribe a foreign public official or an official of a public international organization to induce the official to act or refrain from acting in accordance with their duties.	Does the national REDD+ strategy identify whether such legislation is in place, and if not, recommend that such legislation be adopted as part of the REDD+ readiness process?
Article 17: Embezzlement, misappropriation of property by public official	To adopt legislation establishing as criminal offences, the embezzlement, misappropriation or other diversion by a public official for his or her own benefit of property or funds entrusted to the public official.	Does the national REDD+ strategy identify whether such legislation is in place, and if not, recommend that such legislation be adopted as part of the REDD+ readiness process?

ANNEX E: SUMMARY OF POTENTIAL CORRUPTION RISKS ASSOCIATED WITH REDD+¹³⁵



	Actors Involved			Corruption Threat	Corrupt Practice	Anti-Corruption measure/s
	National	Provincial	Local			
REGULATORY (establishing the rules)						
Design of national REDD+ framework generally	Parliamentarians, political elites, international and national logging companies, industrial scale agribusiness (palm oil, sugarcane, soy, jatropha), multinational corporations, project developers, military			State capture allowing undue influence to affect design of REDD+ strategy Political corruption Grand corruption	Undue influence by political elite, logging companies, agribusiness, etc to prepare a weak national REDD+ framework, or to prepare a framework that will benefit powerful interests	Corruption risk assessment, followed by a detailed and through analysis of proposed framework, possibly under an economic and social impact assessment Multi-stakeholders consultations at all stages of development of national REDD+ framework (including national strategy, legislation and regulations)
Preparation of initial land use plans for REDD+ (spatial planning)	Ministry/ Department of Planning Ministry/ Department of Forestry	Governors and provincial level land use planners	Local government planners	State capture, political corruption, grand corruption influencing REDD+ land use plans, resulting in failure to respect rights of indigenous peoples and other forest-dependent communities	Undue influence or bribes to exclude high value timber concessions from REDD+, while pressing for other areas which have already been degraded (selectively logged) to be included in REDD+ land use plans.	Establish objective criteria to guide land use planning decisions (e.g. ‘at risk’ factors to identify forests to be covered, soil suitability, carbon sequestration potential, biodiversity values). All decision making rules and individual decisions to be made publicly available in an accessible format.

¹³⁵ This Table is adapted from Transparency International's manual analysing corruption in the forestry sector: see Blundell, AG. and Harwell, EE. (2009) *Manual: An analysis of corruption in the forestry sector*, Transparency International and Natural Capital Advisors, LLC, at p 20 (Table 6), and pp 38 – 47 (Appendix 3) which contains a generic map of corrupt practices in the forestry sector, available at <http://www.illegal-logging.info/uploads/Forestsectorcorruptiontoolsnov09FINAL.pdf>



ANNEX E: SUMMARY OF POTENTIAL CORRUPTION RISKS ASSOCIATED WITH REDD+¹³⁵

	Actors Involved			Corruption Threat	Corrupt Practice	Anti-Corruption measure/s
	National	Provincial	Local			
Land and natural resource tenure	Parliament, political elite, departments of planning and forestry			State capture and political corruption resulting in a failure to recognise customary land tenure	Undue influence or bribery to resulting in failure to recognise competing rights of customary land tenure, so that 'political elites' can trump customary claims and capture REDD revenues	Capacity building for land administration sector. Assistance to NGOs who often assist customary communities with land registration process.
Allocation of carbon rights	Parliament, political elites, powerful logging companies, project developers			State capture, political corruption or grand corruption resulting in an inequitable allocation of carbon rights under legal REDD+ framework	Undue influence to link carbon rights to State owner land titles or logging concessions, thus excluding customary communities from control of carbon resources (and possibly REDD revenues)	Close analysis through multi-stakeholder consultations of proposed carbon rights allocation rules
Setting reference levels / emission reference levels	Ministry/ department of Forestry Political elites Powerful logging or agribusiness companies			State capture, political corruption, grand corruption resulting in an over estimation of national reference levels Collusion	Undue influence to artificially inflate baseline so that excess can be 'skimmed' by corrupt officials at a later date; or to set timeline and national circumstances	Clear guidance on establishing baselines to be given by SBSTA, with third party verification of nominated baseline
Design of benefit distribution systems (BDS)	Ministry of Forestry, Ministry of Finance, Political elites	Political elites	Political elites	State capture, favouritism, nepotism, cronyism resulting in weak design of financial management system	Undue influence on BDS which influences who receives REDD+ revenues and benefits	Improvement of public financial management Public financial reporting, multi-stakeholder body to oversee design and implementation of BDS

ANNEX E: SUMMARY OF POTENTIAL CORRUPTION RISKS ASSOCIATED WITH REDD+¹³⁵



	Actors Involved			Corruption Threat	Corrupt Practice	Anti-Corruption measure/s
	National	Provincial	Local			
IMPLEMENTATION OF REDD+						
Land administration		Land administration officials	Land administration officials	Bribery by multinational corporations, project developers	Bribery of land administration officials to overlook competing customary claims to land title, or to create fraudulent land titles	Capacity building and transparency in land administration sector Recourse mechanisms
Spot rezoning of land to permit (or exclude) REDD+ activities in specific areas		Logging operators Carbon brokers	Local level public officials, logging operators, carbon brokers	Bribery	Bribery of public sector officials to change the zoning of an area to allow or exclude REDD+	Public notification and call for public submissions for all rezoning applications and rezoning decisions
Carbon rights		Planning officials Project developers	Local level planning officials	Bribery by corrupt actors of public officials resulting in the loss of carbon rights for indigenous peoples and other forest-dependent communities	Bribery to overlooks competing claims to carbon rights or to fraudulently create or register carbon rights	Capacity building for land administration sector All applications to register carbon rights and decision to register rights to be made publicly available Recourse mechanisms
Carbon measurement risks		Public sector officials in forestry sector	Local level public sector officials	Petty bribery by project developer or at sub-national level	Public sector officials over-estimating the amount of carbon emission reductions or carbon sequestered	C-MRV procedures