



global witness

Review of JPDs and R-PPs Submitted to the 4th UN-REDD Policy Board and 5th FCPF Participants Committee Meetings

Provisions on Non-carbon Monitoring

March 2010

Summary

We find that the eight REDD country proposals under consideration at FCPF and UN-REDD Programme meetings this month generally recognise the key roles that weak governance and law enforcement play in driving or facilitating deforestation and forest degradation. All of the countries have begun to consider how to address these issues, although concrete actions are still few and often poorly elaborated. However, only a few countries have begun to think about how they will monitor and assess progress in addressing governance issues during the REDD readiness phase and beyond. Many of the proposed readiness activities will not result in immediate or directly attributable reductions in carbon emissions, and will need to be assessed in other terms. While some countries have recognised the importance of a system for monitoring governance and other non-carbon social and environmental benefits and impacts, very little detail is given in their proposals about what these systems will look like. Fundamental questions like what exactly will need to be monitored, who oversees the system, who participates in it, and how it will be integrated into the broader REDD strategy are not answered in these proposals, although some countries have taken the first steps. Three out of six R-PPs (Ghana, Suriname, and Mexico) followed an earlier version the template for R-PP preparation that does not include a component on non-carbon monitoring, and consequently have not adequately addressed this topic in their proposals. Overall, our findings demonstrate the need for more guidance on non-carbon monitoring from the FCPF and UN-REDD Programme, as well as the international community more broadly, as early as possible during the “REDD readiness” process to enable feedback to improve the design of REDD strategies.

Methods

This assessment examines the FCPF Readiness-Preparation Proposals (R-PPs) due to be considered at the FCPF’s 5th Participants Committee meeting in Gabon (22-26 March 2010)¹ and Joint Program

¹ Argentina, Democratic Republic of Congo, Ghana (revised), Madagascar (draft), Mexico, Suriname (revised); available on the FCPF website at: <http://www.forestcarbonpartnership.org/fcp/node/256>

Documents (JPDs) due to be discussed at the 4th Policy Board meeting in Nairobi (18-19 March 2010).² It focuses on: 1) how the documents address key forest governance and enforcement issues; 2) what type of system is proposed to monitor and assess governance and other non-carbon “benefits and impacts” related to REDD, now more appropriately termed governance, social and environmental safeguards; and 3) whether a system for independent monitoring is considered. Our assessment is largely based on the standards established by the FCPF for assessing R-PPs.³ The UN-REDD Programme has not formulated its own set of standards so we have used the FCPF standards as a guideline for assessing JPDs.

Key findings

- ***Weak governance*** and the illegal and unsustainable activities that result are acknowledged by all countries as factors contributing to deforestation and forest degradation. ***Poor law enforcement capability is cited as one of the major governance problems.***
- ***The R-PPs and JPDs focus primarily on the MRV (measurement, reporting and verification) of carbon emissions and removals. When they are discussed at all, monitoring of governance and social and environmental “benefits and impacts” of REDD receive far less attention.***
- ***Only three proposals – those of Argentina , DRC, and Madagascar – discuss a system for monitoring of non-carbon “benefits and impacts” of REDD, but they fall short of presenting complete and convincing systems. The countries seem unsure of key elements such as what to monitor, when to monitor it, and what to do with the information.***
- Three countries – ***Ghana, Mexico, and Suriname*** – followed an outdated version of the template for completing R-PPs that did not include a component on non-carbon monitoring. The JPDs for ***Bolivia and Zambia*** were not required to discuss non-carbon monitoring and did not. Consequently, ***these countries do not consider monitoring of governance and social and environmental impacts (i.e. non-carbon monitoring). This demonstrates the need for guidance from the FCPF and UN-REDD on this issue.***
- ***The important role of civil society and especially indigenous peoples and local communities, in the design and operation of monitoring systems is generally recognised but needs further elaboration and clarification in most cases.***
- While all of the REDD programs acknowledge that the implementation and enforcement of laws and regulations – either existing ones or new ones designed for REDD – is a key challenge, ***none has a convincing proposal for how to monitor and assess progress and how the results will feed back into the design and refinement of the REDD strategy.***

² Democratic Republic of Congo (submitted its R-PP to UN-REDD), Bolivia and Zambia; available at the UN-REDD website at: <http://un-redd.org/PolicyBoard/4thPolicyBoard/tabid/3390/language/en-US/Default.aspx>

³ FCPF Program Document FMT 2009-1-Rev.4, “Review and Assessment of Readiness Preparation Proposals, Draft – March 9, 2010”

Background: The critical role of non-carbon monitoring

- A comprehensive monitoring system is an essential part of the FCPF and UN-REDD's "learning by doing" approach to REDD readiness. Without regular feedback on the implementation and impacts of readiness activities, it will not be possible to refine the design of programs and to clearly and meaningfully link activities to impacts, whether positive or negative. Further, many of the readiness activities required to lay the groundwork for successful national REDD programmes will be carried out before any measurable emissions reductions will occur. Many activities cannot be directly correlated with emissions reductions at all, although they are key to ensuring that they are possible. In other words, carbon MRV is not sufficient for monitoring and assessing the outputs of interim REDD financing in a way that can feedback usefully into the design and assessment of REDD strategies. In the longer term, the compliance of REDD activities with governance, social and environmental safeguards, as established under the United Nations Framework Convention on Climate Change (UNFCCC) as part of an international REDD agreement or by multi-lateral development banks, will require the collection of more than just data on carbon. This has been recognised through the inclusion of a provision on monitoring and reporting on safeguards in the most recently published draft REDD negotiating text.⁴ The text requires that the following safeguards *inter alia* are "promoted and supported" by developing countries:
 - "Transparent and effective national governance structures, taking into account national legislation and sovereignty."
 - "Full and effective participation of relevant stakeholders, including, in particular, indigenous peoples and local communities [in the design and implementation of key elements of a national REDD strategy]."
 - "Actions that are consistent with the conservation of natural forests and biological diversity" and "enhance other social and environmental benefits."

In addition to demonstrating compliance with these safeguards, monitoring provides the opportunity to build trust between stakeholders by increasing transparency, inclusiveness and participation in the design, implementation and review of readiness activities. Independent monitoring plays an important role in this by engaging relevant stakeholders, including representatives from civil society, indigenous peoples and local communities, and providing external verification of implementation and impacts of REDD strategies. While the emphasis of this study is the monitoring of governance and other safeguards or non-carbon "benefits and impacts", the inclusion of key stakeholders, particularly local communities,

⁴ Draft UNFCCC REDD text, FCCC/CP/2010/2, 11 Feb 2010, <http://unfccc.int/resource/docs/2010/cop16/eng/02.pdf> para 5 (c). The provision on monitoring and reporting on safeguards remains in square brackets, meaning consensus is still to be reached.

in a system for carbon MRV will be important. This has been repeatedly emphasised by members of the Technical Advisory Panels in their assessment of R-PPs, and has been included by the FCPF as part of the standards for assessing R-PPs (see below).

The FCPF and UN-REDD have both recognised the importance of monitoring beyond carbon and taken steps towards realising this, UN-REDD in its Global Programme of work and the FCPF in the most recent R-PP template⁵ with Component 4b dedicated to the design of a system for monitoring “other benefits and impacts” (i.e. non-carbon). Among the issues to be addressed according to guidance in the template are:

- Monitoring of “key governance factors pertinent to REDD implementation”
- Monitoring of “social and environmental impacts”
- Establishing “independent monitoring and review” that involves civil society and other stakeholders in a system that feeds back finding into the REDD implementation process
- An assessment of systems required for monitoring and review, transparency, accessibility and sharing of data both nationally and internationally (for both carbon MRV and monitoring of other benefits and impacts – Components 4a and 4b)
- Capacity building, and the scope and role of local communities, NGOs, government agencies and the private sector to participate in the monitoring system (for both carbon MRV and monitoring of “other benefits and impacts” – Components 4a and 4b)

The Bank provides a set of standards on the design of a monitoring system to be met by the R-PP, including:⁶

- “Early ideas on including capability to monitor other benefits and impacts, e.g. rural livelihoods, conservation of biodiversity, key governance factors directly pertinent to REDD implementation, and the impacts of the REDD strategy in the forest sector.”
- A description of “how transparency of the monitoring system and data will be addressed”
- Addressing “independent monitoring and review, involving civil society and other stakeholders, and how findings would be fed back to improve REDD implementation.”

Findings and recommendations

1. The central role of monitoring and enforcement is recognized

“Weak law enforcement capabilities, uncertain land tenure, armed strife and corruption will prove to be formidable challenges facing the implementation prospects of any national REDD strategy. There is very little going in terms of working platforms to build from, and in many ways REDD opens up opportunities to reinvent DRC’s development path, including options to tackle natural resource governance issues.” DRC TAP review, March 2010

⁵ FCPF Readiness Preparation Proposal (R-PP) Template, R-PP v. 4 (January 28, 2010)

⁶ FCPF Review and Assessment of Readiness Preparation Proposals, Program Document FMT 2009-1-Rev.4

The challenges of implementing and enforcing laws and regulations in the forest sector, as well as other relevant sectors, is a common theme in all of the proposals reviewed here. High levels of illegality and weak enforcement are consistently acknowledged and discussed albeit to varying levels of detail and completeness depending on the proposal. In some countries, particularly DRC, Madagascar, Ghana and Zambia, illegal activities are listed as drivers of deforestation and forest degradation. The degree to which countries propose concrete actions to address enforcement issues varies, with most countries only putting forward vague ideas and cursory discussions at this point.

2. The need to engage with civil society on monitoring is acknowledged, but its role in each stage of the design and implementation of a monitoring system should be clarified

“[A participatory MRV system] is an important and crucial aspect of REDD and will result in the safeguards necessary to ensure that REDD does not have negative effects for the vulnerable and the poor and the environment.” DRC R-PP, p. 88

3. Proposals for monitoring systems that go beyond carbon remain poorly defined – there is a need for guidance, as has been provided for carbon MRV

Most of the proposals recognise the need to monitor non-carbon factors ensure that REDD strategies are effective and do not result in adverse impacts on forest communities and the environment. None can be said to have a very good idea of what needs to be monitored at each stage in the REDD design and implementation processes. The most advanced thinking can be found in the R-PPs from the DRC and Madagascar. The DRC proposal outlines a system that looks at four types of indicators – governance, social, economic, and environmental – as part of a monitoring system. The proposal lacks detail, however, about what exactly needs to be monitored (a broad list of possibilities is given), and how an effective system for doing so should be designed. As a result, this aspect of the proposal, while welcome The preliminary suggestions in the present proposal, while welcome, do not indicate a clear

and implementing a REDD strategy. significant differences in the scope of monitoring proposed by the different countries assessed here. The DRC proposal is by far the most ambitious in its intent to monitor a range of economic, social, economic and governance aspects of to protect to protect and maximise environmental co-benefits, and not least the need to show compliance with potential safeguards built into an international REDD+ agreement.

The monitoring of carbon emissions and forest cover change are the most developed but it is often not clear how the results of this monitoring will feed back into the ongoing refinement

and adjustment of REDD strategies. Even less so for non-carbon monitoring, although this is arguably even more essential as a tool to assess the success or failure of elements of REDD strategies and make adjustments accordingly. If “learning by doing” only looks at carbon emissions it will be unable to pinpoint and refine weaknesses and problems with the system.

4. The role of independent monitoring in assessing systems-level implementation of REDD is not incorporated in a comprehensive way

Include discussion of frequent mention of the importance of participation by civil society, and in particular local communities, but still little clarity on how communities will be incorporated into monitoring systems. Several TAPs emphasised the importance of participatory monitoring, for carbon and other things.

Ghana revised R-PP, submitted 11 January 2010

Overall, how does the proposal address challenges around governance, and particularly monitoring and enforcement, in the context of REDD?

The role of longstanding problems with forest governance and enforcement, and consequently high levels of illegal logging, in causing deforestation and degradation are acknowledged but not discussed in detail. A background paper (presented in Annex 7) presents a more detailed discussion of past efforts to address these problems. The paper lists the underlying causes of illegality as industrial over-capacity; poor supervision of exploitation at field level; low domestic log prices; inadequacies in the legal regime, and cites studies that identify industrial concessions and non-industrial chainsaw logging as significant sources of illegal timber. The role of FLEGT in promoting governance reforms and addressing illegal logging, and in engaging civil society, is briefly mentioned. Weak regulatory mechanisms and rights regimes and weak enforcement are listed as drivers of deforestation in Table 1 of Component 2a. (p. 39) The emphasis is mostly on illegal chainsaw logging, although non-sustainable logging by the timber industry is also listed as a driver. There is no discussion of past efforts to curb illegality and minimal discussion of the underlying policy issues in Component 2a, although the strategic options in Component 2b include several concrete options for addressing illegal logging.

Does the MRV system assess the scope and role for local communities, NGOs, various government agencies or institutes, and the private sector?

Component 4 does not specify an institution to oversee MRV. It is implied that the same staff and institutions (mostly governmental) involved in establishing reference level emissions (Component 3) will be involved in designing and implementing the MRV system. An MRV working group will be formed that will include representatives from local communities and private sector, although this is vague. No role for NGOs is defined.

How will key governance factors pertinent to REDD implementation, and social and environmental benefits, be monitored?

There is no component 4b. Monitoring governance is not discussed elsewhere. There is no mention of the monitoring requirements of the FLEGT VPA.

It is briefly stated that biodiversity will eventually be monitored and a training workshop is planned.

Does the monitoring system provide for establishing independent monitoring and review (IM-REDD), involving civil society and other stakeholders and enabling feedback of findings to improve REDD implementation?

An international peer review team will look at the monitoring framework and data, and a verification step will be carried out by "national and international experts" but this is not elaborated on.

How are the different monitoring needs integrated and does the system feed back into design, implementation and assessment of the REDD strategy?

Not discussed.

What formal reviews of the proposal are available? What do they say about governance and monitoring? Were the standards for the monitoring component met (R-PPs)?

TAP reviews of draft (PC4) and revised (PC5) RPPs; Bank review. The TAP lists the need for monitoring of biodiversity, health and socioeconomic values beyond carbon (but not governance) as major recommendations. The TAP recommends that the role of civil society, local communities and landowners be further defined. The Bank wants to see more integration between monitoring (REL and MRV) and the other aspects of design. The reviewers do not point out that the R-PP template used by Ghana does not include component 4b.

DRC R-PP, version 2, submitted 2 March 2010

Note: The R-PP was submitted to UN-REDD; page numbers refer to the English version

How does the proposal address the issues of illegality and law enforcement?

The challenges of lack of enforcement capacity and illegality in the concession and informal logging sectors, including illegal cross-border trade are cited. It is stated, for example, that “the capacity of the State and its departments to enforce the law on the vast national territory is a determining factor for the long term REDD success.” (p. 56). Weak law enforcement, including corruption and capacity constraints, is listed as an indirect cause of deforestation in Component 2a (p. 41).

It is encouraging to see that initial studies, consultations and proposed projects will be designed to consider these issues. Some examples include:

- Enforcement-related capacity building through the World Bank managed PNFoCO
- Some of the “geographically integrated pilot projects” are meant to address *inter alia* “instruments of the strategy’s management and for monitoring results” and “monitoring and law enforcement services” (p. 60).
- A study of “transversal” legal reform (Annex 2c) includes an assessment of how law enforcement and governance can be improve (p. 127).

However, proposals made for improving capacity to enforce the law on the ground (p. 56) fail to go far enough considering the realities in DRC (outlined on pp. 38-41). Mechanisms for cooperative enforcement, both *within* country and *across* borders need to be built. While the need for cross border cooperation is recognized (p. 114), the only mechanism offering a practical and legally-binding solution, the Lusaka Agreement on cooperative enforcement operations, directed at illegal trade in wild fauna and flora, is only offered as a possible option.

Elsewhere, contradictory proposals are made for how to deal with illegality in the logging sector (Annex 2b, Programme 5). The recently completed “legal review” of logging titles resulted in the cancellation of 15 million ha of logging concessions due to the failure of these titles to meet legality criteria. This is evidence of the scope of illegality in the concession-based logging system, and yet one proposal presented here is to expand the concession system by 10 million ha.

Does the MRV system assess the scope and role for local communities, NGOs, various government agencies or institutes, and the private sector?

The R-PP discusses a role for civil society in monitoring but as elaborated in the proposal it is in measurement and data management rather than the in the design of the system. For example, a summary table of how civil society will be included in various aspects of the readiness process, including monitoring, states (p. 22):

- “Monitoring system on emissions and removals: Civil society capacities will be built to monitor the biomass of permanent sample plots and civil society will intervene in data monitoring and validation; ...
- Monitoring of social and environmental impacts: “Civil society will be a key actor in managing the flow of information on REDD impacts from the local to the national levels. Furthermore, civil society members will work together with State agents to collect information.”

It is stated that NGOs will only be involved in “verifying certain data and activities in the field” in relation to carbon MRV (p. 81). Furthermore, civil society is not listed as a key partner in Result 3 - “A comprehensive MRV system for REDD is built and operational” - of Table 1 (p. 13).

How will key governance factors pertinent to REDD implementation, and social and environmental benefits, be monitored?

The proposal contains a discussion of participatory non-carbon monitoring, although the details and scope of the program need to be refined. As described in Component 4b, “The DRC’s objective for the 2010-2012 preparation period consists of developing a participatory MRV Management system, culturally adapted and enabling communities to participate in its various dimensions - economic, environmental, socio-cultural and governance aspects - associated with implementing REDD” (p. 88). Component 4b goes on to list a number of examples of what will be monitored in each of the four dimensions (p. 87-88), but the details of how this enormous range of elements will be monitored are lacking, and the proposed system is unconvincing. The proposal states that “various studies” will be performed to identify the “priorities, gaps and implementation mechanisms of the four dimensions” (p. 88). These studies will need to recognize that vastly different methodologies will be required to different types of information.

It is stated that the following aspects of governance will be accounted for by the monitoring system: “ensuring that there is transparency and accountability, quality of and respect for procedures, preventive measures against corruption, as well as law enforcement” (p. 87). However, the methodology and human resources proposed are wholly inadequate to meet the needs of a governance monitoring system. A desk-based approach to collecting information and developing indicators is proposed. This will provide only limited information. A field-based approach (such as that developed through Independent Forest Monitoring), backed by adequate resources, is needed.

A plan to monitor ecosystem-based co-benefits will be developed in collaboration with UNEP (p. 89-90), although the relationship between this program and the overall monitoring system are not made clear.

Does the monitoring system provide for establishing independent monitoring and review (IM-REDD), involving civil society and other stakeholders and enabling feedback of findings to improve REDD implementation?

It is proposed that the verification of data from the monitoring system outlined in Component 4b could be done by an independent organization (p. 89). This is welcome, but does not amount to independent monitoring, particularly where governance is concerned, in that it only refers to assessing data and not process.

The establishment of a reference scenario that goes beyond carbon to look at social-economic information with the participation of civil society, described in Component 3b, is a good addition to this proposal. The process of developing a reference scenario of “national circumstances” will be coordinated with the design of the monitoring system for environmental and social indicators, as well as the SESA process (p. 70).

How are the different monitoring needs integrated and does the system feed back into design, implementation and assessment of the REDD strategy?

There is some integration planned between the creation of a reference scenario that includes socioeconomic information (but not explicitly governance), the monitoring system, and the SESA process. The SESA process and a monitoring system for environmental and social indicators will be coordinated (p. 70). An “assessment of national circumstances” will establish a socio-economic reference level, and gaps in information will feed into the design of the monitoring system (Component 4b). The use of the monitoring system to assess and feedback into pilot projects and REDD implementation activities not discussed.

What formal reviews of the proposal are available? What do they say about governance and monitoring? Were the standards for component 4 met (R-PPs only)?

TAP Review (Feb-March 2010) and FMT comments.

According to the TAP, "Weak law enforcement capabilities, uncertain land tenure, armed strife and corruption will prove to be formidable challenges facing the implementation prospects of any national REDD strategy. There is very little going in terms of working platforms to build from, and in many ways REDD opens up opportunities to reinvent DRC's development path, including options to tackle natural resource governance issues." (p. 6) and "As with Bank projects, however, there needs to be a capable and even more important timely capacity to monitor the implementation of safeguards and provide feedback in real time to project implementers. This function should probably be combined with the overall independent monitoring of project performance in the section on MRV of "other benefits and impacts" described on pp 72-74." (p. 11)

Recommendations on monitoring include:

- The participation of civil society and local communities as well as the role for NGOs and the private sector requires significantly more attention in relation to MRV
- Monitoring the drivers of deforestation needs to be explicitly factored in as a separate piece of assessment. Without this monitoring, it will be difficult to track the dynamic and changing causes of DD and hence to design REDD+ policies to control it.
- The R-PP should be clearer about existing capacity, capacity gaps and the establishment of long-term capacity in MRV

Madagascar draft R-PP, submitted 11 January 2010

Note: page numbers refer to the English version

Overall, how does the proposal address challenges around governance, and particularly monitoring and enforcement, in the context of REDD?

Illegal activities related to mining, fuel wood collection and logging are given as major causes of deforestation and degradation. The inadequacy of existing monitoring systems to locate illegal activities and products is listed as one underlying driver, as are poor governance and corruption. There is limited discussion of specific reasons for the failure to monitor and enforce regulations beyond capacity issues. Along these lines, Component 2a states that "A future REDD strategy will have a higher probability of success if it is supported by a more global governance reform in all key sectors. This will be achieved with measures against corruption and improvement of budgetary transparency in relevant governmental sectors, but also with reinforcement of judicial and police enforcement systems for forest, tenure, mining, and other legislations." (p. 40) One of the strategy options presented in Component 2b is to reinforce "monitoring and control systems" to improve law enforcement. (p. 35)

Does the MRV system assess the scope and role for local communities, NGOs, various government agencies or institutes, and the private sector?

Civil society and NGOs do not play any role in the MRV system proposed.

How will key governance factors pertinent to REDD implementation be monitored?

The implementation of a range of REDD+ measures will be monitored, including:

- the designation and functioning of institutions and financial management arrangements
- clarification of legal framework, especially regarding forest carbon ownership and carbon transactions
- implementation of REDD+ strategy including integration across sectors and in national and regional land use planning; evaluation of work by national partners

- governance at the national level – functioning of institutions, implementation and enforcement of laws
- financial accounting
- implementation of consultation and communication plans

How will social and environmental benefits and impacts be monitored?

Local communities should be involved in field monitoring of “socioeconomic and environmental health indicators.” (p. 66) The relationship between social impacts and financial flows will be measured, including the generation and distribution of revenues to local actors and measures of improvements in livelihoods. It is suggested that the SESA process should determine relevant data and how to collect it. Data will be posted on a website hosted by the National Environmental Office (ONE).

Does the monitoring system provide for establishing independent monitoring and review (IM-REDD), involving civil society and other stakeholders and enabling feedback of findings to improve REDD implementation?

There is no independent monitoring or review function involving key stakeholders. Component 2a refers briefly to the utility of having an independent entity to monitor forestry as a means to reduce illegality.

How are the different monitoring needs integrated and does the system feed back into design, implementation and assessment of the REDD strategy?

Component 2c states that “the institutional framework will also include a feedback system to capitalise results of the MRV system defined under Component 4 of this R-PP. Frequent and regular assessments of deforestation and forest degradation (spatialised and global events and trends) will help adapt planned interventions and reevaluate adopted REDD strategies. Thus, Madagascar’s MRV system would not only be an accounting tool but would also inform and improve the strategy in a dynamic and flexible way.”

What formal reviews of the proposal are available? What do they say about governance and monitoring? Were the standards for the monitoring component met (R-PPs)?

TAP Review, 7 March 2010. The TAP focuses its review of Component 4 on carbon MRV and suggests that this needs to be designed before an assessment of other benefits and impacts can be done. The TAP recommends that local communities, NGOs and the private sector be involved in design of the monitoring system and that participatory monitoring including local communities are part of preparatory activities. It emphasises the need for monitoring of the drivers of deforestation and degradation.

Argentina R-PP, submitted 11 January 2010

Note: page numbers refer to the English version

Overall, how does the proposal address challenges around governance, and particularly monitoring and enforcement, in the context of REDD?

Most forests in Argentina are privately owned, and the contribution of the forest sector to the country's economy is 2% of the GDP. A brief analysis of the drivers of deforestation identifies conversion to agriculture in general and soy expansion in particular as the main cause behind the destruction of forests. Over-exploitation is also mentioned.

There has been a law – which the R-PP describes as exemplary – specifically banning the destruction of forests since 1948, but it has nevertheless proved insufficient to solve the problems in the sector. The law did lead to one positive outcome in the form of technical capacity building.

The right to a healthy environment was included in the Constitution in 1994. Subsequently, in 2002 an Environmental Law was passed. Several principles that should underpin the enforcement of this law, include, among others, accountability and intergenerational equity. These should also be at the core of decision-making.

A new forest law was approved in 2007. Challenges to enforcing it include “weak capacity to control and audit law enforcement in the broad national territory”, the need to “strengthen the control and monitoring systems” (p. 30), some irregularities in land tenure, the lack of experience in initiatives related to payment for environmental services, implementation challenges and increasing public participation and awareness.

A three-phase review of the current regulatory and institutional framework is proposed. Phase one will comprise the review itself, phase two will focus on the design of a framework for implementation and phase three will involve piloting of the system. The system will provide indicators that inform the MRV system, and so the review will be carried out in coordination with assessments of the reporting and verification system and of forest policies (p. 61).

Does the MRV system assess the scope and role for local communities, NGOs, various government agencies or institutes, and the private sector?

The R-PP refers to a REDD national working group, which includes an “academic representative” which will provide an “independent review of issues including the reference baseline and progress on MRV”. The group includes one representative of NGOs, one representative of IPs and one representative of the private sector. There is no information about the selection process of these representatives.

There is recognition that the implementation of a monitoring system requires capacity building. An assessment of the need for building the capacity of “control and monitoring” in the provinces will be conducted and is expected to generate “specific proposals related to real-time monitoring and early warning systems, considering the provincial circumstances.” (under Component 2a, p. 47)

How will key governance factors pertinent to REDD implementation be monitored?

This system will be independent from the carbon system but linked to it where necessary. The objective is to “design and implement an MRV system of co-benefits, impacts, drivers of deforestation and degradation, and associated governance and policy issues.” (p. 79)

Biodiversity and social, as well as governance and the drivers of deforestation and forest degradation, will be monitored. The R-PP does not provide much detail about how this will be done. It refers to existing systems as building blocks and, in the case of governance, it proposes the development of indicators that inform about (i) the degree to which the law is being implemented and enforced, and (ii) capacity building of the provincial authorities for monitoring and control activities. (p. 81)

How will social and environmental benefits and impacts be monitored?

Biodiversity will be monitored through tools such as sampling and inventories. Existing broad methodologies to measure social parameters will be drawn upon. It is proposed that the forest inventory might include some social data to be gathered alongside other data included in it.

Does the monitoring system provide for establishing independent monitoring and review (IM-REDD), involving civil society and other stakeholders and enabling feedback of findings to improve REDD implementation?

Within Reporting and Verification, the creation of a working group is suggested. This would be hosted by the civil society organisation in charge of normalisation and certification. Along with other civil society organisations, it will develop guidelines and procedures for public reporting and independent verification. It is expected to draw from ISO regulations and other certification initiatives.

How are the different monitoring needs integrated and does the system feed back into design, implementation and assessment of the REDD strategy?

Argentina proposes two independent MRV systems, one for emissions and removals, and another for co-benefits, impacts and effectiveness of the strategies implemented. The final phase of the SESA will involve integration into the system for MRV of benefits and impacts. (p. 63)

MRV of deforestation is given priority, whereas other REDD+ components will be incorporated to the MVR system gradually until all REDD+ components are covered.

The MRV system in component 4a is expected to comprise five core components:

- A monitoring system of the forest cover through remote sensing.
- A permanent inventory system which covers the whole forest area.
- Allometric coefficients and equations for air biomass.
- Creating an integral information system which enables public reporting and independent verification of the information generated.
- An ongoing improvement of the system.
- Creating a regional MRV system for each forest region, including an MRV system with neighbouring countries which share the same forest typology.

What formal reviews of the proposal are available? What do they say about governance and monitoring? Were the standards for the monitoring component met (R-PPs)?

PC Synthesis Review (22 Feb 2010) and TAP Review. The PC Synthesis Review found that: "Reasons for lack of law enforcement are only summarily addressed: institutions responsible etc. Since enforcement might well become a major component in readiness activities, more information and analysis would be helpful. Forest Governance has to do with process – that is how decisions are made, rather than what those decisions are. Actors and stakeholders beyond the government and beyond the forest sector are involved in governance." (p. 5) The use of an independent monitoring body is suggested, with a possible ombudsman function to address issues regarding the rights of stakeholders (eg. tenure rights). (p. 4&11)

The TAP Review considers that Components 2 and 4 are only partially met. The TAP recommends that a discussion of how to address the issue of poor enforcement be included in Component 2a. (p. 6) It found that ideas on how to monitor non-carbon benefits in Component 4b have not been adequately developed. It recommends an elaboration of what will be monitored and how, capacity constraints and how these will be addressed, defining the scope for independent verification, and the selection of a fully independent verification organisation. (p. 10)

Overall, the idea presented by Argentina of regional monitoring by ecosystem types common to neighbouring countries is acknowledge as a strength of the proposal, as is the idea of developing an MRV system for safeguards, although it is not clear where this is proposed in the document. (p. 1)

Suriname revised R-PP, submitted 11 January 2010

Overall, how does the proposal address challenges around governance, and particularly monitoring and enforcement, in the context of REDD?

A list of past efforts to reduce deforestation and degradation in Component 2a turns out to be a list of relevant policies, laws and regulations with no analysis of whether they were successful or not. A proposed assessment on the above topic will look at “monitoring and enforcement measures” among many other things, and will be carried out with by “relevant stakeholders” and the government. (p. 35) The topics and expected output of the assessment are extremely broad in scope and lacking in detail, as are the TORs listed in Annex 2. There is no specific discussion of governance issues.

Weak monitoring and enforcement is identified as a potential driver of deforestation in conjunction with mining and logging in Table 2a1. (Component 2b, p. 40) Weak enforcement is listed several times in Table 2a1 as a factor that might trigger or accelerate deforestation. Strategy options include: “long-term monitoring of development processes by the Government”, “establishing a monitoring system for transparency, and the equitable sharing of revenues from carbon credits for ecosystems services”, capacity building and institutional strengthening for implementing and monitoring institutions”.

Currently, five million hectares of forests are designated for “sustainable timber production” and this area may extended “as part of ongoing developments and national circumstances”. There is not discussion of the levels of illegal logging although weak enforcement is a theme throughout the document.

Does the MRV system assess the scope and role for local communities, NGOs, various government agencies or institutes, and the private sector?

All activities during the readiness phase will be monitored and evaluated by an “independent monitoring body” that is the National Planning Office. There is nothing in the R-PP about what the National Planning Office is or how the monitoring will be done. The consultation plan will include “assessment and capacity building of local, Indigenous and Maroon people” to involved in the monitoring system. (p. 67) The National REDD Working Group “will consist of representatives of governmental institutions, the private sector, civil society, the local communities and academia” (p. 11) and oversees background assessments and the design and implementation of the readiness strategy, including the carbon monitoring system.

How will key governance factors pertinent to REDD implementation be monitored?

No Component 4b. An MRV system will inform evaluations by the National REDD Working Group regarding the implementation of the readiness strategy in line with the objectives of Component 6. What exactly will be monitored is not elaborated.

How will social and environmental benefits and impacts be monitored?

No Component 4b. The consultation plan includes provisions for independent monitoring of the process, but as discussed above, the proposed monitoring body is a government agency lacking independence.

Does the monitoring system provide for establishing independent monitoring and review (IM-REDD), involving civil society and other stakeholders and enabling feedback of findings to improve REDD implementation?

There is an “independent monitor” but this appears to be the government Planning Office, which as is pointed out by the TAP Review, cannot be considered independent.

What formal reviews of the proposal are available? What do they say about governance and monitoring? Were the standards for the monitoring component met (R-PPs).

TAP Reviews for PC4 and PC5. Only the PC5 review of 4 March 2010 is discussed here. The TAP recommends that the independent monitoring body be, for example, a multi-stakeholder group that is independent from government decisions. Capacity building for local communities to monitor the implementation of the R-PP is also recommended. The reviewers point out that the monitoring of safeguards is not included but admit that in the absence of agreed guidance from the UNFCCC this is understandable. On the original recommendation of the TAP, a brief mention of the intent to engage local communities in monitoring has been added but not elaborated. The failure of the monitoring system to address social and environmental factors or the impact of government policies on deforestation is raised.

Mexico R-PP, submitted 11 January 2010

Overall, how does the proposal address challenges around governance, and particularly monitoring and enforcement, in the context of REDD?

Governance is discussed in some length in Component 2a. (p. 22) Key themes identified in an external evaluation by a government-led community forestry programme were local governance, equitable and transparent decision-making, forest management based on sound silvicultural rules, community involvement in all aspects of REDD projects and environmental awareness. The effective enforcement of rules and regulations is listed as a key risk to REDD.

The drivers of deforestation are discussed in a table in Component 2b (p. 29), which has some level of detail around strategies and potential action, risks and mitigation measures. Uncontrolled logging is listed in the table, with potential strategies including improved enforcement and increased cooperation between local communities and NGOs, academia, and “institutions in charge of forest governance.”

A consultation workshop carried out in 2008 concluded that Mexico has a great potential to develop a REDD program rapidly, but that some key issues have to be resolved, such as developing a national monitoring system.

The REDD strategy is expected to focus on two main activities. The first one, “Reference Emissions Scenario and monitoring” includes the design and implementation of a permanent monitoring system based on the integration of various satellite imagery and permanent and temporary monitoring plots. The second one is the “design and implementation of the REDD strategy”, is to be carried out with national, regional and local consultations of stakeholder groups.

Does the MRV system assess the scope and role for local communities, NGOs, various government agencies or institutes, and the private sector?

A methodology for the consultation process is expected to be designed and tested prior to implementation. One of the themes of the consultations will be the monitoring system. It is expected that local leadership capacity building and participatory approaches within communities, as well as local consensus building mechanisms, will be included.

How will key governance factors pertinent to REDD implementation be monitored?

There is no component 4b in this R-PP.

How will social and environmental benefits and impacts be monitored?

There is no component 4b in this R-PP. There is substantial detail on the consultation process, including what has been carried out for the development of the R-PP itself and a plan for future consultations. Consultation bodies for the latter include a Technical Advisory Committee with civil society participation. Regional and local consultations are also included. Consultations are expected to allow the National Forestry Commission (CONAFOR) to identify issues to be incorporated in the implementation of REDD.

Does the monitoring system provide for establishing independent monitoring and review (IM-REDD), involving civil society and other stakeholders and enabling feedback of findings to improve REDD implementation?

There is a provision for a government-independent body to be responsible for the carbon accounting system. International expertise is expected to be required to verify all the steps of the R-PP execution. CONAFOR, is expected to contract relevant organisations to, among other things, help set up an “independent monitoring and verification system”. However, no further detail is provided about what this system will look like.

How are the different monitoring needs integrated and does the system feed back into design, implementation and assessment of the REDD strategy?

There is no component 4b in this R-PP. The way different bodies and institutions will work together on REDD is presented in Figure 2. (p. 12) It is suggested that CONAFOR will hire an organisation with the expertise to develop the Reference Emission Scenario and MRV system, and to lead the consultation (p. 11). The various REDD strategy options will be assessed from several points of view, including their integration with other sector policies and strategies (p.26).

What formal reviews of the proposal are available? What do they say about governance and monitoring? Were the standards for the monitoring component met (R-PPs)?

TAP Review, 3 March 2010. The TAP states that the R-PP discusses governance issues such as land tenure disputes, illegal logging and other illegal activities, and the inability of the government to address these issues. It recommends that lessons from past efforts to address deforestation and degradation be presented.

Although the TAP refers to the current template, which contains Component 4b, for its evaluation, the R-PP used a version that did not contain this component. Not surprisingly, the TAP finds that the elements of Component 4b are not met. The TAP describes the monitoring system as “top down” and notes with regard to the lack of truly independent monitoring that “the effectiveness and credibility of the proposed REDD policies and programs will depend heavily on the transparency and rigor of the monitoring and evaluation approaches used”. The TAP recommends that stakeholder input be sought on “how to best implement credible independent and transparent monitoring and evaluation activities with widespread legitimacy,” and that participatory monitoring activities be considered and capacity constraints for local engagement discussed.

Zambia JPD, posted 4 March 2010

Overall, how does the proposal address challenges around governance, and particularly monitoring and enforcement, in the context of REDD?

While the drivers of deforestation and degradation are discussed, their relative contributions are not given. The three main drivers are given as fuel/energy, timber production, and unsustainable agriculture and land use (para 76).

The section on lessons learned for approaching REDD includes this statement (para 98): “A weak policy environment, lack of a planning and consultative model, and weak policy implementation and

monitoring, in general, have been cited as major reasons for programme failures and high levels of poverty within Zambia. Consultation with stakeholders that are or may be affected by public policy is not compulsory.” In paragraph 114, it is stated that many of the primary drivers could be reduced through “effective enforcement of legislation.”

The Anti-Corruption Commission Act and the “country led governance assessment” being carried out with UNDP are presented as indicators of commitments to improving governance. The lack of capacity to effectively implement, monitor and enforce laws and regulations is cited as a problem in many contexts, including implementation of development programs (para 34), forest management policies in general (para 44), concession- and non-concession-based timber harvesting under the Woodlands Management System (para 47), and the findings of Environmental Impact Assessments required by the mining code (para 114). Along these lines, Table 3 lists wood production as a root cause of deforestation and degradation and says that “Inadequate monitoring of timber concessions results in deforestation and forest degradation in many parts of Zambia...the government lacks the technical capacity and staff to efficiently manage timber concessions, and consequently timber extraction tends to exceed sustainable levels.”

The need for cooperation between enforcement and forestry agencies is listed as a potential REDD-relevant activity as a bullet in (para 73). However, it is clear that legal and policy reforms must be implemented as well. There is no mention of regional enforcement or the Lusaka Agreement.

The potential negative impacts that corruption and rent-seeking behavior could have on local communities, with REDD+ resulting in evictions and other unintended consequences, is cited as further reason to address problems with tenure laws whereby the government has control of the trees and therefore the carbon (para 118). The government is able to give 99 year renewable leases for land that includes rights to the resources except sub-soil in the case of significant mineral finds (para 19).

There is an inaccurate reference to EITI in paragraph 60 which attributes it to the World Bank and does not clearly explain how EITI is relevant in the context it is mentioned.

Does the MRV system assess the scope and role for local communities, NGOs, various government agencies or institutes, and the private sector?

The JPD states: “ For initiatives such as REDD+ that have a strong scientific orientation, it is common for scientific agendas to pre-empt engagement by other parties and drive the process. This has been reflected already in the response from some stakeholders in the current engagement process. In order to minimise such problems, it is advised that there be greater stakeholder participation in the project planning and implementation. Policies derived without engagement from interested parties are likely to be resisted by local government as well as communities. Whilst broad-stroke policy and monitoring processes can be derived from engagement with national government, private sector and other listed parties, participatory approaches (including communities and district authorities) in project areas are essential to derive effective grassroots implementation strategies.” (p. 27)

Despite the above, the discussion of the MRV system in the JPD is focused mainly on designing a carbon MRV system, and does not explicitly describe a role for NGOs or local communities.

Overall, while the importance of the participation of key stakeholders, and local communities and leadership in particular, is mentioned repeatedly throughout the document (especially with regards to natural resource management), there is very little detail presented about the how this will be done during the implementation of the NJP. Specifically, how stakeholder feedback will inform the design of

the MRV and benefit-sharing systems, for example, and the overall REDD+ strategy, and what the roles and responsibilities of civil society will be in ongoing monitoring, reporting, and review processes. This is left to be elaborated as part of Outcome 2 (p. 53).

The REDD Technical Committee, housed in the Forestry Department, is an inter-ministerial body with limited NGO representation. The REDD Coordination Unit, also in the Forestry Department, does not include civil society representation.

How will key governance factors pertinent to REDD implementation be monitored?

There is no discussion of monitoring governance. The Monitoring, Evaluation and Reporting framework (Table 8, p. 74) includes implementation of legal reforms as something to be monitored, but does not elaborate how this will be done.

How will social and environmental benefits and impacts be monitored?

While it is acknowledged that the REDD+ monitoring system should address more than carbon in keeping with the recommendations of the UN-REDD Framework Document (p. 87), there is no further discussion of the topic.

Does the monitoring system provide for establishing independent monitoring and review (IM-REDD), involving civil society and other stakeholders and enabling feedback of findings to improve REDD implementation?

There is no discussion of a system for independent monitoring.

How are the different monitoring needs integrated and does the system feed back into design, implementation and assessment of the REDD strategy?

There is little detail about how the monitoring system will be integrated and feed back into the development of REDD+ policies.

What formal reviews of the proposal are available? What do they say about governance and monitoring? Were the standards for the monitoring component met (R-PPs)?

Reviews by the UN-REDD Secretariat and a technical expert, summarised in the National Programme submission form.

The Secretariat calls for civil society involvement to be an essential part of “independent MRV processes.” It suggests that “managing and addressing relevant governance issues” be incorporated into the risk management section and include mention of “independent MRV with civil society participation.”

Bolivia JPD, posted 4 March 2010

Overall, how does the proposal address challenges around governance, and particularly monitoring and enforcement, in the context of REDD?

Governance is not specifically discussed. However, institutional barriers are identified, and include:

- Institutional weakness for enforcing current regulations due to the following situations:
 - Limited institutional capacity regarding territory issues and needs
 - Personnel rotation
 - Absence of economic resources
 - As an example: the former Forest Superintendence was never able to carry out five-year audits, control smuggling or verify the correct implementation of forest management plans.
- Absence of a state-regulated body with full capacities and enough resources (human, financial, technical) for managing REDD+
- Absence of a forest and carbon MRV system

Barriers related to laws and policies include:

- A Legal and normative framework which is not geared to the implementation of REDD+
- Lack of a REDD+ benefit transfer and distribution system

The establishment of an MRV system for forest carbon is expected, as well as the establishment of a reference scenario, adjusting the legal and normative framework to the requirements of REDD+, defining a transfer and distribution system of REDD+-derived benefits, establishing and implementing an action plan for reducing emissions from DD and – finally – strengthening a Government institution so that it manages REDD+.

Does the MRV system assess the scope and role for local communities, NGOs, various government agencies or institutes, and the private sector?

Two out of three outcomes proposed in the NJP specifically focus on improving capacity of government institutions and civil society respectively. The third one refers to generating REDD+ experience at a local level, with the participation of civil society.

How will key governance factors pertinent to REDD implementation be monitored?

There is no discussion of monitoring governance.

How will social and environmental benefits and impacts be monitored?

There is no discussion of monitoring non-carbon benefits and impacts.

Does the monitoring system provide for establishing independent monitoring and review (IM-REDD), involving civil society and other stakeholders and enabling feedback of findings to improve REDD implementation?

It is suggested that monitoring activities are to be carried out by UN Agencies (FAO, UNEP and UNDP). These are to be subject to internal and external audits, but these are merely financial. There is no mentioning of an independent component in the monitoring system.

How are the different monitoring needs integrated and does the system feed back into design, implementation and assessment of the REDD strategy?

It is not clear from the NJP how the monitoring system will operate or feed back into the overall REDD strategy.

What formal reviews of the proposal are available? What do they say about governance and monitoring? Were the standards for the monitoring component met (R-PPs)?

Reviews by the UN-REDD Secretariat and a technical expert, summarised in the National Programme submission form.

As with Zambia, the Secretariat recommends the inclusion of an “independent MRV system with

participation of civil society.”