



global witness

**Review of JPDs and R-PPs Submitted to the 4th UN-REDD Policy Board
and 5th FCPF Participants Committee Meetings
Provisions on Enforcement and Non-carbon Monitoring
March 2010**

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 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 illegality 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 evaluation is largely based on the standards established by the FCPF for assessing R-PPs³ since the UN-REDD Programme has not formulated its own set of standards on these topics. The complete results can be found in the Annexes to this document.

Summary

The eight REDD country proposals under consideration by the FCPF Participants Committee and UN-REDD Policy Board generally recognise the key roles that weak governance and law enforcement play in driving or facilitating deforestation and forest degradation through failing to address illegal and unsustainable activities. 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 of the template for R-PP preparation that does not include a component on non-carbon monitoring, and

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>

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"

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.

Key findings

- The illegal and unsustainable activities resulting from weak governance 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.** However, none of the JPDs or R-PPs outlines a set of convincing measures to address these issues.
- **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 programmes 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.**

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 programmes 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, 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)

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.

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

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.”

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

Annex I. Assessments of JPDs from Bolivia and Zambia and R-PP from Democratic Republic of Congo (DRC)

DRC R-PP, 2 March 2010 (English version)
<p>How does the proposal address the issues of illegality and law enforcement?</p> <p>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).</p> <p>It is encouraging to see that initial studies, consultations and proposed projects will be designed to consider these issues. Some examples include:</p> <ul style="list-style-type: none"> • Enforcement-related capacity building through the World Bank managed PNFoCO • Some of the “geographically integrated pilot projects” are meant to address <i>inter alia</i> “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 improved (p. 127). <p>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 <i>within</i> country and <i>across</i> 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 offered merely as a possible option.</p> <p>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. However, one proposal presented here is to expand the concession system by 10 million hectares.</p>
<p>Does the MRV system assess the scope and role for local communities, NGOs, various government agencies or institutes, and the private sector?</p> <p>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 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):</p> <ul style="list-style-type: none"> • “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.” <p>Similarly, 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). Moreover, civil society is not listed as a key partner in Result 3 - “A</p>

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 and impacts, be monitored?

The proposal contains a more detailed discussion of non-carbon monitoring than do the JPDs from Bolivia and Zambia. 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 provide 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. The approach to collecting information and developing indicators appears to be desk-based and as such 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 programme 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 the monitoring of processes.

The establishment of a reference scenario that goes beyond carbon to look at socio-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 socio-economic 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 is not discussed.

What formal reviews of the proposal are available? What do they say about governance and monitoring?

World Bank: Technical Advisory Panel (TAP) review, FMT comments
UN-REDD: Secretariat and summary Technical Expert reviews

The UN-REDD Technical Expert recommends that a “reliable and effective programme monitoring system” be used to provide “real time feedback” on problems and benefits, and the MRV involve more engagement with civil society and especially local actors. The reviewer further recommends “independent verification through (frequent) periodic review” as well as an independent monitor with a mandate for regular reporting.

The TAP states: “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). According to the TAP, the standards for Component 4 of the R-PP have not been met. Recommendations from the TAP 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.

Zambia JPD, posted 4 March 2010 (English version)

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

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 lack of capacity to effectively implement, monitor and enforce laws and regulations is cited as a problem in many contexts, including forest management policies in general (para 44) and concession- and non-concession timber harvesting under the Woodlands Management System (para 47). In paragraph 114, it is stated that many of the primary drivers could be reduced through “effective enforcement of legislation.”

The need for cooperation between enforcement and forestry agencies is listed as a potential REDD-relevant activity as a bullet in paragraph 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, to which Zambia is a party.

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, however, 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.

How will key governance factors pertinent to REDD implementation, and social and environmental benefits and impacts, 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. 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)?

Secretariat and summary Technical Expert reviews.
 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 (English version)
How does the proposal address the issues of illegality and law enforcement?
<p>The proposal identifies illegal forest activities and domestic logging as main causes of deforestation and degradation (p. 16). It cites illegal activities as (p. 56):</p> <ul style="list-style-type: none"> • Impunity of actors who do not observe the forest law • Corruption • Pressure from specific wood-related industries carrying out illegal logging. <p>With respect to enforcement, the proposal cites (p. 16):</p> <ul style="list-style-type: none"> • “Institutional weakness for enforcing current regulations due to the following situations: <ul style="list-style-type: none"> ○ 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+” <p>With the exception of a proposal to address the risk of corruption (p. 48), it is unclear how illegal activities and weak enforcement will be effectively addressed.</p>
Does the MRV system assess the scope and role for civil society, including indigenous people and local communities?
<p>Two out of three outcomes proposed in the NJP specifically focus on improving the capacity of civil society in REDD implementation (p. 6). However, the role of civil society in the proposed forest and land use monitoring system is not specified.</p>
How will key governance factors pertinent to REDD implementation, and social and environmental benefits and impacts, be monitored?
<p>There is no discussion of monitoring non-carbon benefits and impacts other than a reference to “following-up/monitoring the implementation of REDD+ and its impacts at the local level,” including the impacts of proposed pilot projects.</p>
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?
<p>There is no provision for independent monitoring and review.</p>
How are the different monitoring needs integrated and does the system feed back into design, implementation and assessment of the REDD strategy?
<p>It is not clear from the NJP how the monitoring system will operate or feed back into the overall REDD strategy.</p>
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)?
<p>Secretariat and summary Technical Expert reviews.</p> <p>As with Zambia, the Secretariat recommends the inclusion of an “independent MRV system with participation of civil society.”</p>

Annex 2. Assessment of R-PPs from Argentina, Ghana, Madagascar, Suriname, and Mexico

Argentina
How does the proposal address the issues of illegality and law enforcement?
<p>A new forest law was approved in 2007. Challenges to enforce it include “weak capacity to control and audit law enforcement in the broad national territory”; the need to “strengthen the control and monitoring systems” is acknowledged (p. 30).</p> <p>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” (p. 47).</p>
Does the MRV system assess the scope and role for civil society, including indigenous people and local communities?
<p>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. Community-based monitoring of natural resources will be used when possible.</p>
How will key governance factors pertinent to REDD implementation, and social and environmental benefits and impacts, be monitored?
<p>Environmental and social factors, as well as governance and the drivers of deforestation and forest degradation, will be monitored. Standards such as the Climate, Community and Biodiversity Alliance (CCBA) will be considered for biodiversity monitoring. It is proposed that the forest inventory might include some social data to be gathered alongside other data included in it.</p> <p>The R-PP very briefly mentions a proposal to design governance-related indicators on (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). However, no detail is provided about the governance indicators to be monitored. Generally, the approach appears to be desk-based rather than field-based, so likely to provide limited information.</p>
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?
<p>There is no provision for independent monitoring and review. In relation to carbon MRV, a working group including civil society will develop guidelines and standards for reporting and independent verification of information.</p>
How are the different monitoring needs integrated and does the system feed back into design, implementation and assessment of the REDD strategy?
<p>An “MRV system of co-benefits, impacts, drivers of deforestation and degradation, and associated governance and policy issues” (p. 79) will be linked to the carbon monitoring system where necessary. The carbon MRV system will include:</p> <ul style="list-style-type: none"> • Creating an integral information system which enables public reporting and independent verification of the information generated. • An ongoing improvement of the system. <p>The final phase of the SESA will involve integration into the system for MRV of benefits and impacts (p. 63).</p>

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 (e.g. tenure rights) (pp. 4 and 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 organization (p. 10).

Overall, the idea presented by Argentina of regional monitoring by ecosystem types common to neighbouring countries is acknowledged 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).

Ghana revised R-PP, 11 January 2010

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

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 civil society, including indigenous people and local communities?

There is no Component 4b in this R-PP. 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 and impacts, be monitored?

There is no component 4b in this R-PP. Monitoring governance is not discussed. 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 review of revised R-PP; World Bank comments. The TAP lists the need for monitoring environmental and socioeconomic values beyond carbon (but not governance) and the drivers of deforestation 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.

Madagascar draft R-PP, 11 January 2010
How does the proposal address the issues of illegality and law enforcement?
The inadequacy of existing monitoring systems to locate illegal activities and products is given as an underlying driver (p. 29), as is poor governance and corruption. There is limited discussion of specific reasons for the failures to monitor and enforce regulations. It is stated 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 civil society, including indigenous people and local communities?
In designing the carbon MRV system, “local experience on participatory environmental monitoring” will be sought (p. 57). The non-carbon monitoring system would involve multiple stakeholders – local communities are specifically referred to.
How will key governance factors pertinent to REDD implementation, and social and environmental benefits and impacts, be monitored?
The implementation of a range of REDD+ measures will be monitored, including (p. 65): <ul style="list-style-type: none"> • 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

Local communities should be involved in field monitoring of “socioeconomic and environmental health indicators” (P. 65). 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 capitalize results of the MRV system defined under Component 4 of this R-PP. Frequent and regular assessments of deforestation and forest degradation (spatialized 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 is part of preparatory activities. It emphasizes the need for monitoring the drivers of deforestation and degradation.

Suriname revised R-PP, submitted 11 January 2010

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

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 of this will look at “monitoring and enforcement measures” among many other things, and will be carried out 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 little discussion of governance issues in Suriname, although weak monitoring and enforcement, and the illegal logging that results, are identified as a potential driver of deforestation in conjunction with mining and logging in Table 2a1 (p. 40).

Currently, five million hectares of forests are designated for “sustainable timber production” and this area may be extended “as part of ongoing developments and national circumstances”. There is no 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 civil society, including indigenous people and local

communities?
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 support involvement 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 oversee 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, and social and environmental benefits and impacts, be monitored?
There is no Component 4b.
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.
How are the different monitoring needs integrated and does the system feed back into design, implementation and assessment of the REDD strategy?
An MRV system will inform evaluations by the National REDD Working Group regarding the implementation of the readiness 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)?
TAP review of revised R-PP. The recipients of MRV capacity building efforts, including NGOs, local actors, and indigenous peoples, should be indicated. 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. Based on an earlier TAP recommendation, 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, 11 January 2010
How does the proposal address the issues of illegality and law enforcement?
The effective enforcement of rules and regulations is listed as a key risk to REDD. Law enforcement capacity has been improving but there is still a lack of “human and financial resources” to enforce the laws, and some areas of the country are inaccessible due to the presence of “organized groups of illegal loggers, drug traffickers and, in some specific areas, guerrilla groups” (p. 24).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.”
Does the MRV system assess the scope and role for civil society, including indigenous people and local communities?
Substantial detail is provided 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

<p>are also included. A methodology for the consultation process is expected to be designed and tested prior to implementation and 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.</p>
<p>How will key governance factors pertinent to REDD implementation, and social and environmental benefits and impacts, be monitored?</p>
<p>There is no Component 4b in this R-PP.</p>
<p>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?</p>
<p>There is a provision for a body independent of the government 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.</p> <p>The National Forestry Commission (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.</p>
<p>How are the different monitoring needs integrated and does the system feed back into design, implementation and assessment of the REDD strategy?</p>
<p>There is no Component 4b. Consultations are expected to allow CONAFOR to identify issues to be incorporated in the implementation of REDD.</p>
<p>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)?</p>
<p>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.</p> <p>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”, that participatory monitoring activities be considered and capacity constraints for local engagement discussed.</p>

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