

México R-PP review

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Review by the Forest Carbon Partnership Facility Participants Committee

Contributors:

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General Comments

Although in an early phase, Mexico has a clear potential for REDD and solid previous experience in MRV and forest conservation programs to build on. The document is advanced in conceptual terms and in describing and analyzing the status quo as a starting point for a meaningful R-PP strategy. Some improvements to the REDD strategy needed, such as sector wide analysis and coordination between branches of government and between national, federal and local level - as well as strengthening and aligning existing initiatives and assessing governance risks.

The Mexican R-PP shows as few others the complexities of the preparation and implementation processes. The template offers a wealth of hints and suggestions to make formulation easier. Most activities under the different components are inter-related. It is therefore recommended to cross-check activities in all components to identify critical paths, bottlenecks in terms of institutional capacities. Some components have information that will be better including in the specific component for that issue (ej Page 22 and 23. Component 2a **Technical and operative issues** contain information about monitoring and GHG inventory, that would be better include in component 4 or 3)

A list of acronyms would make R-PP's more user-friendly.

Environmental co-benefits are mentioned in several parts of the document. However, the REDD readiness strategy is not explicit on how these environmental benefits would influence e.g. selection of pilot areas, what would be the overall importance of these benefits for general decisions on different choices of the future REDD strategy. Would high biodiversity cores of one possible pilot area weigh over other consideration?

Similarly, social benefits are addressed but remain vague and too abstract in the definition of activities and the overall REDD strategy. 'Just and fair compensation' seems to be the motto for social benefits, but who will when define what this means concretely. And based on what? What are the socio-cultural dimensions to it, what are the implications for national social policies, among other aspects?

An overall monitoring of carbon stocks would probably require a more detailed look into forest degradation and natural regeneration (secondary forests) and their implications for carbon stocks; the inclusion of afforestation and reforestation activities; a consideration on how to deal with existing A&R

activities under the Clean Development Mechanism and, especially, in the context of projects selling credits on voluntary markets outside the formally established compliance market under CDM.

Several approaches are discussed internationally to achieve full readiness for REDD. Among them, the Nested Approach describes a stepwise, iterative process by which it is possible to link sub-national projects with the national accounting for all forest related carbon stocks. The document is not clear with regard to the Mexican strategy. If a Nested Approach is intended, it will be necessary to explain better the general way of doing it and how to achieve the national focus later on.

The REDD strategy will gain from bundling promising approaches as a result of alternative scenarios, cost and time considerations (opportunity costs!) and the respective discussion. May be not all possible (and desirable) activities can be implemented due to institutional, political or legal constraints.

Costs: from the document it is not clear if all costs to establish readiness for REDD are included in the cost tables. Such a comprehensive list of cost items would substantially support decision making on REDD. In addition, costs to be borne by third parties (not government, not Forest Carbon Partnership Facility) should be attributed to other sources.

The analysis of cost tables brings about a general observation: what exactly is to be included in the budget? Are all up-front investment costs to be included or not? This is independently from the question of who finances what at which point of time. A comprehensive indication of all costs involved would help to truly appreciate the huge effort the preparation for REDD brings upon.

Time frame: as a general remark, there is an apparent need to establish a critical path including activities of all components. Otherwise, a component could seem to be ready while in reality it is still “waiting” for inputs from activities under other components.

Capacity development: Mexico is certainly very much advanced in technological aspects. However, the significant changes required in institutional settings, manpower, etc. for REDD to be successful might well require substantial capacity development or capacity building. This aspect seems worthwhile to be further developed.

The information and activities regarding Indigenous Peoples need further specification and development.

Component specific comments		
Section	Finding/assessment	Conclusion/recommendation
1a National Readiness Management Arrangement.	1. -Sectorial coordination is not clearly presented and reflects that the REDD management is still at an early stage. Plans for the REDD WG to include various parts of the ministry is presented, however the concrete composition of this is unclear.	1. -Include professionals from other ministries and government institutions, academia and civil society with social science competency to supplement the strong forestry/environment

	<p>-The REDD task force will be comprised of forest-related branches of government, academia and civil society concerned with forest conservation.</p> <p>2. Mexico is a federal state and it is unclear how the various states will be included in the REDD efforts both in consultation, preparation and implementation</p> <p>3. Relationship between REDD Task Force (p.10, box second para) and the R-PP development team (p. 6) is not clear: what are the contributions of the former to the document? The composition of the latter is mainly forest sector and academic organizations without representation of the broader group with NGO, civil society, indigenous peoples, private sector, etc. In the REDD development team list is not reflected the paragraph <i>“The ad hoc REDD task force that prepared the R-PP is composed of representatives of governmental institutions (forestry and non-forestry), NGOs, Forest organizations, the academic sector, and financial institutes “</i></p> <p>4. Is not clear the difference and relationship between the REDD-working Group and REDD task Force. Will CICC in the end be the responsible government body to adopt and supervise the REDD readiness strategy? Or CONAFOR? E.g. who will be responsible for the REDD registry; for reporting vis a vis UNFCCC; for the future mechanism of compensatory payments? The graphical and textual presentation doesn't give enough information in this regard. Who exactly is currently part of the REDD TF and which organizations should participate in the future?</p> <p>5. From Table 1a p. 13 it becomes apparent that the REDD TF would not require external inputs beyond FY 2011. Does this mean that there will be no more TF meetings? No further dissemination nor information</p>	<p>competence of CONAFOR in the drafting of the Consultation Plan and the preparation of Mexico's REDD strategy</p> <p>-There seems to be considerable scope to strengthen coordination and collaboration between the forest authorities and other key authorities and economic sectors driving deforestation.</p> <p>2. The involvement of states and local authorities in the REDD efforts could be more clearly spelled out.</p> <p>3 and 4. More clarification on the compositions and functional relationship between REDD TF, REDD WG and CONAFOR is requested for a better understanding.</p>
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	<p>specialist(s) available? What would then be the role of TF in 2012 and 2013? Will it continue at all?</p> <p>6. No mention of all the indigenous peoples organizations</p> <p>7. This para “ (REDD-WG) will be installed with well-defined tasks, once the preparing documents are finished” is not consistent with previous paragraph “The REDD-WG has been nominated in November 2009 by the Inter-secretarial Commission on Climate Change (CICC)”.</p> <p>8. In the Fig 1. <u>REDD 2009-2012</u> . It is not clear what this title means.</p> <p>9. Page 1. This para “<i>As mentioned earlier, this will be accomplished through active involvement of the landowners, who at the end will implement any activity designed for REDD.</i>” This para is saying that all activities of REDD strategy will be implemented by private landowners. The government is not an implementation entity?</p>	
1b Stakeholder consultation and Participation	<p>Stakeholder consultations so far are only held with organizations, and not with local communities, however a detailed plan for further consultations at all levels is included. The plan shows a clear intent to consult and to include these in the preparation of the R-PP. It is difficult to assess, based on the existing plan, whether indigenous peoples rights to land and natural resources and indigenous peoples` right to be consulted in accordance with ILO Convention 169 will be addressed in the REDD strategy</p> <p>ejidos as important actors with collective land use (and forest) rights are a very specific Mexican structure in the constitution and respective legislation. A more explicit description of their expected role in the consultative and implementation process. This would help people not familiar with Mexico better understand this issue.</p> <p>Page 18, Consultation Plan: It is suggested broadening the notion of</p>	<p>Include professionals from other ministries and government institutions, academia and civil society with <u>social science competency</u> to supplement the strong forestry/environment competence of CONAFOR in the drafting of the Consultation Plan</p> <p>Be concerned to comply with the ratified ILO 169 when conducting consultations.</p> <p>For presentation of the R-PP during the Gabon meeting is suggested an updated list of consultations carried out until that date.</p> <p>Add more specific information on reactions from civil society, businesses, Ejidales, individual land</p>

	<p>benefits by including...."that intends to incorporate all actors in the design and implementation and benefit sharing of a REDD program..."</p> <p>c.) Application.... at the national level: please clarify what "national level" means here: is it the nation-wide approach with consultation throughout the country, on all levels of govt. And with all types of stakeholders (as indicated on p. 19 under 3., which I suppose is the case)? Or just federal institutions?</p> <p>With regard to d.) Dissemination of results (p. 18) ... the sense is (see also further details under "4. The dissemination.... "on p. 19) that the described activities and budget will stop at a given point of time. It would be important to show the current line of thinking on how to establish a continuous consultative mechanism beyond the readiness phase.</p> <p>General remark on the budget, p. 20: for a huge and complex country like Mexico, amounts for a full consultation process might well be three or fourfold the value indicated. In addition, the consultation with communities would not cover all relevant stakeholders.</p> <p>Page 15. The final outcome of the various meetings were :</p> <ol style="list-style-type: none"> 1) "the application of a national REDD strategy, possibly with a nested approach" is the nested approach an strategy??? 2) What is the forest definition adopted???? 3) monitoring, reporting and verification methodologies to be applied for Mexico (is there agreement about reporting and verification methodologies already?) <p>Indigenous peoples and other forest-dependent groups. There is need to be more detailed in this complicated issue. Indigenous seem to appear only as potential beneficiaries. What about the risk and conflicts?</p>	<p>owners, and indigenous communities</p> <p>Calculate a realistic budget including all relevant costs on all relevant levels of government, etc.. This will make it easier for readers to fully understand the complexity of the tasks at hand.</p> <p>More information is needed in the following issues: Indigenous peoples: will there be more languages involved rather than Spanish? Which are the representative bodies of indigenous communities and peoples in Mexico? How will those be involved? What will be the government position towards the principle of free, prior and informed consent (FPIC) as developed under the UN Convention on Indigenous Rights?</p> <p>Gender issues, especially in rural areas, are proably a sensitive issue; they might come to play a very important role for REDD to be inclusive and successful. Pls visualize more the role of women in consultation (and implementation). One of the few points the R-PP hints on this is p. 25, para on poverty with respect to dependence of poor people on firewood. The same sensitivity is true for private business. The role of private enterprises in REDD could be developed further in the document.</p> <p>How will "satisfaction" of consulted stakeholders with the process be evaluated, measured and documented. Include feedback mechanisms intended/ planned for continuous feeding back posterior experiences with implementation of a</p>
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	<p>3. The application of the consultation at a national level. Only forestry sector is included. What about agriculture and farmers producers and other potentially conflictive stakeholders.</p>	<p>REDD strategy.</p> <p>The consultation process so far, repeats some information of component 1a.</p> <p>More information about indigenous people traditional consultation ways is needed.</p>
2a assessment of Land Use, Forest Policy and Governance	<p>1. A well described - but not a consistent - assessment of the current situation, the drivers, the data and estimations throughout the document.</p> <p>2.The risk of deforestation and degradation seems to increase in areas with unresolved land tenure conflicts</p> <p>3. There is no discussion on the overall state of governance in Mexico and very little assessment of the governance structure within the forest sector.</p> <p>4. Most of ejidos, communities and private forest owners are not organized enough for sustainable forest management; nevertheless good examples of communitarian forestry exist in some states.</p> <p>5. More information and analysis on the direct and indirect, underlying causes on D&D is needed.</p> <p>6. The text mentions a specific definition on forests (for REDD purposes only?) on p. 22. Second para.</p> <p>7. The relationship between land tenure category and D&D seems to be important for understanding the processes and to counteract efficiently.</p>	<p>2. Clear analysis of current situation necessary. <u>The planned reference scenario, Deforestation Risk Analysis and consultations may (as projected in the R-PP) help this process.</u></p> <p>2. Prioritize clarification of land tenure issues and resolve land conflicts at an early phase</p> <p>3. Assessment of the governance structure need to be strengthened. The R-PP process should include measures to target illegal logging and corruption in the forest sector.</p> <p>4. It would be useful to have an assessment of how the REDD strategy can increase involvement of forest owners in sustainable forest management through a participatory approach.</p> <p>5. What are the relevant regulations and laws in place that favour/ or fail to constrain D&D in land use policies? How do they relate to REDD readiness? What needs to change in other sectors than forests for REDD to be successful? Examples: export policies and incentives for agricultural production for export markets?</p>

	<p>8. Forest Policies: an overview over core aspects of current forest legislation, norms and regulations would be helpful to better understand the overall situation – and proposals for action. In addition, key aspects of forest administration could complement information: presence of forest service in rural areas, organization at the level of states; manpower. Management plans and their effects. What are the most important shortcomings in current legislation and administration? Discussion on these topics for REDD would be much appreciated.</p> <p>Law enforcement (p.24). The statement of shortcomings in law enforcement are rather generic. What exactly are experiences with the preparation and implementation of Forest Management Plans? How does the system of authorization for harvest work, what are the weak points in it? What does the lack of human and financial resources mean in terms of quantity and quality? How is the entire system supposed to work in theory and what happens on the ground?</p> <p>Governance issues: Last para on p. 22 indicates four themes yet elaborates on five issues (in running text following this statement, pls. Adjust accordingly).</p> <p>9. Statements in last para on p.22 and following on p. 23 (<i>Technical and operative issues:</i>) are relevant but might go better to component 3 or 4.</p> <p>10. The excellent observations on the role of communities, their force and strengths (p. 24 para 5) invite a more profound analysis of implications for REDD: piecing together the power of ejidos and communities with overall area under their control (55% of all forest area!) would indicate that working with them might well be one of the most promising yet time consuming REDD strategies. What would be</p>	<p>Biofuels? Infrastructure; direct and indirect incentives from government fuelling D&D? Do there exist “perverse” incentives increasing D&D? Are there drivers of D&D related to a lack of alternatives in production/ consumption of forest lands?</p> <p>Which are the institutions in charge of enforcing the respective laws and regulations? What are their current strengths, weaknesses and constraints? How can these be overcome through and throughout the REDD readiness phase?</p> <p>6. Pls. share this definition with readers and discuss it in light of other definitions applicable in Mexico, and definitions e.g. by FAO.</p> <p>7. Is recommended putting the respective studies high on the agenda to achieve REDD readiness. This should also include protected areas. In addition: are there insights available on the effect of forests under an internationally acknowledged forest certification scheme and their behavior re D&D?</p> <p>8. What are the most important shortcomings in current legislation and administration? Discussion on these topics for REDD would be much appreciated. a synopsis over relevant legislation and impacts on D&D is recommended.</p> <p>Governance issues for REDD would go beyond the forest sector. What are impacts on overall</p>
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	<p>the implications of such an approach for time and money requirements?</p> <p>11. Land tenure (p. 24, last para): The information given is an excellent starting point for a more detailed analysis on land tenure and D&D.</p> <p>12. Poverty: p. 25 first para: would be recommended more detailed on the overlay of forest presence and poverty/ marginal areas. What is probably the true impact of poverty today on D&D? What is the importance of existing forests and (free?) access of poor people to forest resources for their subsistence? Can there be strategies devised for reducing dependence of forest dependent poor people and groups on forest resources? how can forest dependent people be made a constructive part in protecting forests against deforestation and forest degradation?</p> <p>13. Cost table component 2a, p. 25: Pls indicate currency (USD). There seems to be an inconsistency between title of budget ("Assessment") and activities which seem to point at the development of pilot experiences. The main activity proposal for component 2a "Develop a proposal to expand current PROCYMAF local models to a PILOT scale REDD sub-activities in at least 800 forest communities.", doesn't fit the objective of this component. Please explain where and to what extent the assessment of gaps regarding land use policies, forest policy and governance will be dealt with.</p>	<p>governance e.g. from drug cartels? Do armed or unarmed insurgency processes hinder governance at local/ state levels? How do/ could they impact on future REDD-regimes? See p. 24, para 4 on law enforcement. It would be helpful to provide more discussion on these aspects as they are directly related to the approaches (national, nested).</p> <p>11. Since land tenure is a core element for any future REDD program, I invite more detailed analysis on this issue. E.g. how much of the forest do the 85% of geo-referenced properties cover? What about the remaining 15%? Is it speculation to assume that forests will be over-represented in these 15% with no regulated land tenure? What does that mean in terms of governance – REDD?</p>
2b REDD strategy options	<p>1. Unclear how REDD will be framed in a larger policy context: The R-PP presents a brief overview of various REDD strategy options with an emphasis on reference emission scenario and design and implementation of the REDD strategy. The presented analysis is forest-centric, i.e. few policy options are presented in other key sectors, e.g. most notably agriculture and key infrastructure sectors</p>	<p>1. More informative assessment of forest policy, forest management and institutional analysis, and analysis of the drivers needed.</p> <p>Overall the presented REDD strategy options are superficial and should be strengthened and a more detailed analysis of policy options in the agricultural and livestock sector should be</p>

	<p>2. The R-PP includes several references to the fact that the forest regions are among the most marginalized and impoverished in Mexico. Mexico has extensive experiences with environmental/conservation funds. The R-PP does not identify key lessons learned from previous forest management and PES programmes - and more specifically how these will be the basis to design the REDD related activities.</p> <p>3. the R-PP would gain coherence if all the points shown in table 1, pages 28 and 29, are also systematically treated in component 1 a.</p> <p>4. The columns with potential actions, risks involved and mitigation measures like logical chain may only be thoroughly addressed at a later stage of REDD readiness. Is not clear the “limited use of forested area” like drivers of deforestation.</p> <p>5. Budget (p. 34): several activities, mainly focusing on studies are proposed under this subcomponent. What will happen with the results? How to develop – and to describe – the process necessary to come to a national REDD strategy? This entails inclusion of results of other components, of course. Is not clear how the proposed activities will define a REDD strategy and how this strategy will be nested within the country development policies. Is not clear how these activities create a work program to delineate a REDD strategy.</p>	<p>included. It will be of key importance to identify policy options that could be implemented. <u>The planned reference scenario, deforestation risk analysis and consultations may as projected help this process.</u></p> <p>2. It could have been spelled out more clearly how REDD activities have a pro-poor approach and how benefit sharing to the local level is envisioned.</p> <p>It could be assessed how existing environmental/conservation funds can be used as REDD funds and how existing forest conservation initiatives can be coordinated or scaled up into the REDD strategy.</p> <p>In section 2a the main activity is to assess how current models could be scaled up. It is not clear whether or how this will identify key lessons learned from previous programmes, or result in a nation-wide assessment on how existing programmes and funds can be coordinated and modified into a coherent REDD strategy.</p> <p>3. The drivers described here would even more benefit from an attempt to analyse relative importance of these for overall D&D, at best broken down to the state level. This information might not be readily available yet, of course. However, this approach would help defining gaps and consequently major activities under</p>
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		<p>component 2 a). In addition, a validation of drivers would help to find more clarity in the different levels between direct – indirect drivers, underlying causes, etc. Bringing together the a) (rough, approximate) quantification of contributions of each driver to D&D and b) efforts on all levels of govt. And society implied in addressing these sets of drivers would allow for bundling together different REDD strategies and for discussing different priorities and options.</p> <p>4. As an approximate step, the R-PP could focus on core areas and a few high priority areas that can be described with currently existing knowledge and be elaborated in more detail. The “jumping” from drivers and ways to address them in the table pp. 28 and 29 to concrete action on different intervention levels seems to omit on very important intermediary step: the definition of different strategy options, their implications, costs, benefits etc. It is find hard to understand how activities attribution can be made in a meaningful way before addressing the different options to be developed. This holds also true for the calculation/ estimation of costs related to achieving REDD readiness and to implement a REDD mechanism (costs for preparation, costs for operation of the system or mechanism).</p> <p>5. The document would be more targeted if information on this would be included here (in addition to what is said in components 1 b, 2 a</p>
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		and others.)
2c REDD implementation framework	<p>Very short description of the studies that are needed to be undertaken. Unclear how various states will be included in REDD strategy.</p> <p>Important questions (cf. Guiding questions from FMT in the template) remain to be answered (see p. 35) and also is lacking background information on the topic (ej, reference legislation)</p> <p>No capacity building activities are indicated; what are the implications of “establishment of an institutional, legal and political framework...” (cf. Activity 1 under activities, p. 36). Are there hurdles, delays etc. to be expected from the legislative process? Is it realistic to have (page 37, Activity no. 1) to have the institutional, legal and political framework in place?! This would mean that institutions and Parliament don’t even have relevant results from other components available to make decisions/ to prepare themselves. How can the framework be in place even before consultations are finalized?</p> <p>P. 37 – schedule; first activity refers to components 7 and 8. What are these?!</p> <p>Cost table (p. 38): Costs given seem selective. To really set up the implementation framework, Mexico will have to deal with huge, really huge up-front investments. One example: costs to establish the institutional setting with sufficient human, financial resources; and many aspects more.</p>	<p>Assessment of the governance structure need to be strengthened and the involvement of states and local authorities in the REDD efforts could be more clearly spelled out.</p> <p>To establish success indicators.</p> <p>Add some background information and analysis.</p>
2d SESA	<p>Some indications for schedule this component is fully developed and its results are available before making decisions on components 2 b and 2 c. Otherwise a SESA might backfire on work done prior to this in the</p>	<p>To provide more detail on the how, who, with whom, where, when and how much of the SESA.</p> <p>At least the outline of this major workload should</p>

	<p>respective components.</p> <p>Not to mention time and financial requirements for FPIC compliance.</p> <p>The World Bank safeguards are mentioned, but not specified which of them will apply. Any specific considerations on Indigenous people are mentioned. Consultation with indigenous people must be address the FPIC issue, and how this will be achieved.</p> <p>Is not clear how the controversies or conflict will be addressed in this component.</p>	<p>be given including a realistic estimation of time and financial resources involved. Given the consultative requirements, the costs for this sub-component would be considerably higher than those presented on p. 43.</p> <p>Include specific mentions of indigenous people and activities to address this issue.</p> <p>Develop ToRs of this component.</p> <p>Point out the links the other components</p>
3+4: Reference Scenario and Monitoring System	<p>There are plans to develop a “monitoring system, which incorporates various satellite imagery with efficient ground truthing, such as the Brazilian “PRODER” monitoring system” and to use a Deforestation Risk Index (DRI) at national scale as a part of the baseline and reference scenario assessment.</p> <p>Brazil is recognized as one of the leading countries on MRV internationally, because of their capacity for remote sensing combined with in-situ data collection.</p> <p>that reference scenarios might consider aspects not only based on the past but also on other considerations.</p> <p>objectives and outcomes for this component are lacking.</p> <p>In the strict sense, Objective no. 4 (p. 45, box) is not part of a reference scenario, it could, maybe should go to component 2 b.</p> <p>While data on deforestation can be derived back in time to the 1990</p>	<p>A Forest resources in Latin-America needs to be considered from a regional perspective as well. Does Mexico have MRV expertise that can be used by neighboring countries? Is a regional approach to MRV possible?</p> <p>Deforestation Risk Index will be useful also in order to assess drivers and identify future REDD policies</p> <p>What are the capacity building requirements for this sub-component?</p> <p>How will the Monitoring System operate in reality? Who, how, information fluxes? Who will do what with which levels of authority? Accountability on different levels of the system? Is there a potential that the monitoring system manages data sensitive to national security</p>

	<p>based on mainly LANDSAT imagery, no such data is available for forest degradation. In light of this fact, how is deforestation to be addressed in the ex-post analysis and, consequently, in projections? considering the deforestation risk map an excellent tool for predictions; no such a degradation risk map can be drawn easily for the reasons mentioned. What are the thoughts of the authors on this?</p> <p>Since Mexico is an impressively complex and huge country: will cost estimates really allow for a full flung reference scenario? And if so, which IPCC tier can be achieved in real terms?</p> <p>Studies and Inventories conducted so far is almost not mentioned. What is the starting point of Mexico in this issues? What are the capacities and monitoring program already operational?</p> <p>does the proposal deal with all relevant aspects re satellite image technology; data processing etc.?</p> <p>proficiency; relationship between satellite image processing – forest inventory – ground</p> <p>truthing methods – use of additional sources of information; confidence intervals; statistics in</p> <p>general; is a minimum mapping unit area of 2 ha good enough, and how will degradation be dealt with? In addition, how are A&R to be dealt with in the Monitoring System? Among the wealth of sensors offered (p. 52 third bullet point), there are technologies of very distinct and different nature, implications for technology, data quality etc.: which sensor is best for which task; which resolutions are needed e.g. for tracking forest degradation? Costs of data acquisition: are they</p>	<p>considerations? If so, how to deal with this?</p> <p>Is reference to GOF-C-GOLD enough for the purpose of the R-PP?</p> <p>What are the capacity development requirements in terms of specialized manpower? Ways and means of training?</p>
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	<p>included in the budget? If not, what are reasonable cost estimates for this acquisition initially and over time? In other words, what are the true costs for establishing and running the system?</p> <p>Which aspects of biodiversity will be part of the monitoring system? Landscape level? Species level? More information would be required to assess this aspect of the monitoring system.</p> <p>Are there already systems of environmental monitoring in place upon which the REDD Monitoring could build on?</p> <p>In a similar way, is there the intention of including monitoring of social impacts and if so, on which level? How would such a monitoring fit into existing monitoring approaches available on the social aspects at local level?</p> <p>The conservativeness principle is mentioned (p. 52, third para on 4. Estimation...) which would be applied to estimations of emission reductions. This is an excellent approach and strongly encouraged. However, under a tier 3 level of information (same page, first para), monitoring of emissions and their reductions would have the benefit of concrete and specific calculations and not estimations. How can this contradiction be overcome?</p> <p>Costs/ see table 4 p. 55: the bulk of costs in this component (and overall R-PP budget) is about making data available. From the explanation it does not become clear what the linear 5.556 million USD per year from 2010-2013 are intended for: is it only about the measurement of the annual re-measurement of 20% of all conglomerates from the national forest inventory? Or only for the</p>	
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	additional 5% measurement?	
Component 5 – Schedule and Budget	Table 5 page 56 ff.: what is the reason to limit the time horizon of planning to years 2010 and 2011 if most components carry activities that go beyond that period? Without this information it is not clear, from only looking at table 5, why costs would stretch until 2013.	<p>As mentioned in previous comments on individual components, the question raises to what extent the overall budget of approx. 40 million USD really represents all costs involved to establish readiness.</p> <p>Recurrent costs to operate the REDD system would be something else bilateral and multilateral donor agencies would be interested in, besides national decision makers.</p>