## NGO Observer Interventions on R-Package at PC12

We are glad that there was been some convergence around the contents and scope of the R-Package, and think this should be recognized in a decision during this meeting but view this as insufficient progress for a process that has been going on officially for one year now. We are very disappointed by the draft R-Package resolution circulated yesterday, and think it represents little overall progress in these discussions, and some actual steps back, which is highly unfortunate.

In February of 2010, CSO's organized a workshop with the FMT to discuss safeguard applications under the FCPF and specifically the SESA process. One of the agreements coming out of that meeting was that midterm and R-package reporting were the two moments of public accountability in the readiness phase under the FCPF, in which REDD countries would document their progress against clear and rigorous standards or benchmarks and it would be reviewed by national stakeholders and the international community, and thus were an important part of the overall application of safeguards under the FCPF.

Now, more than two years later we have no clear readiness benchmarks or standards for an assessment framework, no agreement on the steps to get there. This work is truly urgent and must be prioritized by the FCPF. As the FMT will verify, CSO's have remained insistent on this point for many years now—a midterm and R-package framework should have been elaborated at the beginning of the FCPF, making clear what the expected outcomes of readiness would be and how country's would be expected to report on those outcomes. We have likewise insisted on an inclusive process to develop benchmarks to assess country status as it relates to readiness.

The donors on the Carbon Fund just agreed to budget more than a half million dollars to a robust process for elaboration of the MF, including to bring in a variety of outside experts on different issues, to systematically bring in learning from other climate policy initiatives, to foster multi-stakeholder dialogue on the issues at the national and international level, and produce a series of drafts for comment and feedback. That is what we have been calling for R-Package as well. To invest those resources for the CF and not provide resources to the RF to develop the process for mid-term and the R-package and the associated criteria with the assistance of experts sends a very troubling signal and creates the appearance that donors and the World Bank are putting readiness efforts in second place and prioritizing operationalization of the Carbon Fund.

We do not deny that the issue of how to measure progress in REDD readiness is a complex one, and that it may be difficult to reach agreement on the criteria and indicators to do so, but that does not mean that we should abdicate our responsibility for robust assessment and instead fall back on a process of country self-assessment based on whatever criteria and indicators they chose and a rubber stamp endorsement by the PC. That will backfire and seriously undermine the legitimacy of the FCPF, dramatically increase the risks of implementing REDD+ programs, and in the end will undermine the sustainability and accountability of REDD+ policies and actions.

Instead, we need to quickly build on the progress that has been made to date and agree on a systematic and coherent process moving forward that will give us a sound mid-term process by PC13 and an R-Package template and assessment process on both the national and international levels by the end of

the year. I think we can say with confidence that the FMT does not have the expertise nor the capacity to do this on its own. We need outside expert support, we need input from other climate policy initiatives and we need ongoing inputs from all the stakeholders in the REDD space.

There has been good work done on progress indicators for REDD readiness by many parties, including UNREDD, FAO, PROFOR, CIFOR, UNPFII, the CBD, and WRI to name a few, to not incorporate this work into the R-Package as appropriate would be self-defeating.

We recognize that few countries will be fully ready for REDD in the space of the next few years, at least in the original sense of the R-Package when it was conceived in 2008 and put in the Charter, and that there will be a wide range of readiness depending on country conditions and capacities. In light of this, many in civil society have urged the FMT to not develop a single top down standard for readiness, but rather an assessment framework with a series of bench marks that will help countries, stakeholders and the international community to assess where along a spectrum of REDD readiness countries are at the time of R-Package, and to identify the priority gaps where more work needs to be done. This does not mean that there should not be an agreed on common set of benchmarks and criteria and perhaps even indicators, nor absolve the PC of its obligation to ensure countries have clearly met some minimum standards before they endorse an R-Package.

In the same light, we have proposed that an important step in the R-package assessment process is a robust multi-stakeholder evaluation at the national level. We assume that by the time a country reaches the R-Package stage there will be a large and diverse group of rights and stakeholders who have been working on SESA and safeguards, RL and MRV, and who have come together in a series of consultations and dialogues to elaborate a national REDD strategy, so it will not be particularly challenging to have representatives of these rights and stakeholders to assess progress at the time of R-Package. If additional resources are needed by countries to organize meetings, discussions or consultations on the R-package, we urge the PC to make them available. Independent third party assessment of the R-Packages is an equally important aspect, and a new Terms of Reference for the TAP that goes beyond a desk review to include country visit, should be prepared as one of the pieces of the assessment framework.

In conclusion, in order to complete this amount of work in such a concentrated timeframe, we propose the PC form a WG for mid-term review and R-Package benchmarks and authorize a budget for the FMT to contract outside expertise and consultants to help. The resolution from this meeting should contain a clearly delineated process for coming up with a full assessment framework, with a timeline and adequate budget. To the contrary, we will have to conclude that the World Bank and the donors to the FCPF are not really interested in evaluating the results of their investments of public monies in REDD readiness, which we think civil society, and many parliaments, will find unacceptable.