TAP Review of the R-Package prepared by Sudan February 20th 2019 Kojwang H.O. PhD

Contents

TAP Assessment Framework	INTRODUCTION: THE CORE TASK OF THE TAP REVIEW	1
PART B1. SUMMARY OF REDD+ PROCESSES – STRENGTHS AND WEAKNESSES OF THE R-PACKAGE FROM THE SELF-ASSESSMENT PROCESS 5 PART B2. ASSESSMENT BY THE TAP 8 COMPONENT 1. READINESS ORGANIZATION AND CONSULTATIONS 8 COMPONENT 2. REDD+ STRATEGY PREPARATION 9 COMPONENT 3. REFERENCE EMISSIONS LEVEL/REFERENCE LEVELS (Green) 11 COMPONENT 4. MONITORING SYSTEMS FOR FORESTS AND SAFEGUARDS 11	TAP Assessment Framework	2
FROM THE SELF-ASSESSMENT PROCESS	PART A. REVIEW OF THE SELF-ASSESSMENT PROCESS AND THE ACCOMPANYING DOCUMENTATION	2
PART B2. Assessment by the TAP 8 Component 1. readiness organization and consultations 8 Component 2. REDD+ Strategy Preparation 9 Component 3. Reference Emissions Level/Reference Levels (Green) 11 Component 4. Monitoring Systems for Forests and Safeguards 11	PART B1. SUMMARY OF REDD+ PROCESSES – STRENGTHS AND WEAKNESSES OF THE R-PACKAGE	
COMPONENT 1. READINESS ORGANIZATION AND CONSULTATIONS	FROM THE SELF-ASSESSMENT PROCESS	5
COMPONENT 2. REDD+ STRATEGY PREPARATION	PART B2. Assessment by the TAP	8
COMPONENT 3. REFERENCE EMISSIONS LEVEL/REFERENCE LEVELS (Green)	COMPONENT 1. READINESS ORGANIZATION AND CONSULTATIONS	8
COMPONENT 4. MONITORING SYSTEMS FOR FORESTS AND SAFEGUARDS	COMPONENT 2. REDD+ STRATEGY PREPARATION	9
	COMPONENT 3. REFERENCE EMISSIONS LEVEL/REFERENCE LEVELS (Green)	.11
SUMMARY ASSESSMENT AND RECOMMENDATIONS TO THE PC	COMPONENT 4. MONITORING SYSTEMS FOR FORESTS AND SAFEGUARDS	.11
	SUMMARY ASSESSMENT AND RECOMMENDATIONS TO THE PC	.12

INTRODUCTION: THE CORE TASK OF THE TAP REVIEW

This document provides a review of the R-Package Self-Assessment Report prepared by Sudan, through a facilitated participatory self-assessment process, between the months of December 2018 and January 2019, supported by the REDD+ Program Management Unit and the Technical Advisory Committee. A total of 74 participants from 9 different stakeholder groups took part in the exercise. This included government ministries, agencies and departments, Civil Society Organizations (CSO)/Non-Government Organizations (NGOs), the private sector, academia and representatives of international organizations present in Sudan.

The process of participating in readiness activities and conducting a self-assessment process is a useful way to create local ownership of the approaches used, demonstrates local commitment to REDD+ Readiness; identifies early achievements and gaps, as well as generate feedback that can be used to improve plans for future emission reductions. It is in that that context that Sudan joined the FCPF countries and prepared its Readiness Preparation Proposal (R-PP) in 2013, which was approved in 2014 then followed by a series of readiness activities that have now culminated into the preparation of the R-Package which is now being assessed.

 The purpose of the review is primarily to assess both progress and achievements of REDD+ Readiness in the country using a Readiness Assessment Framework (http://www.forestcarbonpartnership.org/sites/fcp/files/2013/July2013/FCPC%20framework%2 Otext%207-25-13%20ENG%20web.pdf), which consists of a set of 34 readiness criteria, distributed under four main readiness components, and their respective sub-components.

TAP ASSESSMENT FRAMEWORK

- 2. To perform the assessment, the TAP conducted a desk review of key documents starting with the R-Package document itself, Sudan's Readiness Preparation Proposal (R-PP), and a mid-term review report by the FCPF on its progress toward REDD+ Readiness. As in other similar assessments, the terms of reference issued to the TAP by the FCPF Facility Management Team stated the following:
 - i. Perform a review of Sudan's progress and the self-assessment report, based on guidelines in the R-Package Assessment Framework.
 - ii. Review Sudan's documentation of stakeholders' self-assessment, including the process that was used for the self-assessment and the reported outcome.
 - iii. Review key outputs and documents that underpin, and are referenced in, the R-Package, including documents pertaining to the national REDD strategy and Environmental and Social Management Framework (ESMF), reference levels and forest monitoring, and national institutional structures.
 - iv. Provide constructive and targeted feedback, as required to align the processes used for self-assessment and reported outcome, comparing with the R-Package Assessment Framework guidance.

The TAP expert is then required to verify completeness of the R-Package, including:

- i. A summary of the readiness preparation process;
- ii. A report of the multi-stakeholder self-assessment process;
- iii. The results of the national multi-stakeholder assessment;
- iv. References to documentation pertinent to the nine subcomponents, prepared during the readiness preparation process.

PART A. REVIEW OF THE SELF-ASSESSMENT PROCESS AND THE ACCOMPANYING DOCUMENTATION

Self-Assessment process according to the R-Package guidelines

- 3. In the R-Package, Sudan has stated its participation in REDD+ is motivated by its national development interests and global climate change obligations and to which it has special interest as an arid and semi-arid country. It joined the FCPF in 2013 during which it prepared its R-PP, an improved draft of which was produced and approved by the FCPF Program Committee in 2014. Thereafter, Sudan signed a readiness grant agreement in 2015 worth USD 3.8 million and an additional grant of USD 5 million in 2018, which was preceded by a mid-term review in 2017
- 4. The R-Package as submitted is well-structured, easy to comprehend and has generally complied with the requirements of the R-Package Assessment Framework. The progress made against each of the 34 assessment criteria are well described and the self-assessment scores are presented according to each of the stakeholder groups namely; Program Management Unit (PMU), State Focal Points (SFPs) and Community Based Organisations (CSOs).

Facilitated Self-Assessment Process

- 5. Sudan has made it clear that it was guided by the FCPF Readiness Assessment Framework, guided by an independent facilitator working with national stakeholders, and was based on the 34 assessment criteria and a set of diagnostic questions, which have been clearly presented in the component-by-component summary assessment tables in the entire report.
- 6. In a process that involved 74 participants from 9 stakeholder groups and overseen by the PMU and Technical Steering Committee, the facilitated self-assessment was conducted between the months of December 2018 and earl January 2019. The stakeholders included government ministries, Civil Society Organizations (CSO)/Non-Government Organizations (NGOs), Private Sector, academia and representatives of the World Bank and FAO.

Time frame and development of the Readiness Process in Sudan

- 7. Summaries of a few key processes and milestones are hereby provided as a background to the R-Package itself.
- 8. Sudan effectively joined the REDD+ readiness process through the FCPF in 2013, when it produced a Draft R-PP, an improved version of which was approved by the FCPF's Participants' Committee in 2014. Thereafter it received its first readiness grant of 3.8 Million USD in 2015 managed by a Program Management Unit (PMU) created under the auspices of its Forest National Corporation (NFC), under the Ministry of Agriculture and Forestry, and guided at the national policy level by Higher Council for Environment and Natural Resources (HCENR) and advised by a Technical Steering Committee. After a mid-term review in January 2017, the first phase of readiness was completed in 2018 and thereafter a decision was made by the FCPF to make an additional grant of 5 million USD in March 2018 to consolidate what had been started under the earlier readiness grant. A flow chart showing the key milestones toward readiness are illustrated in Figure 1 in the R-Package, and it is anticipated that all readiness activities will be completed by December 2019.

National ownership for REDD+ Readiness Process

- 9. The self- assessment report by Sudan, has provided a clear picture of stakeholder participation, segregated by gender, presents and discusses progress made, lessons learnt, and shortcomings, and at the end of each component and sub-component, the gaps and recommended actions are clearly listed and described.
- 10. Section 2.1.1 of the R-Package describes support that the FNC through the hosting of the REDD+ PMU, and other needed facilities for staff under the PMU at the national and those at sub-national levels. In addition, staff of the PMU and State Focal Points for each of Sudan's 18 States are seconded from the FNC; providing further evidence of ownership of the REDD+ Process by the Government of Sudan.
- 11. As reported in the section dealing with REL and RL, Sudan has substantively involved its academic and research institutions in these technically challenging processes. The participation of the

University of Khartoum and the National Remote Sensing Centre are examples of such involvement.

PART B1. SUMMARY OF REDD+ PROCESSES – STRENGTHS AND WEAKNESSES OF THE R-PACKAGE FROM THE SELF-ASSESSMENT PROCESS

An overview

- 12. Part I of Sudan's R-Package has described the processes and achievements in chronological order, key donor support, REDD+ Coordination arrangements and Technical Support entities, as well as the key participants in the self-assessment process that produced the document under review. Most importantly, sections 1.2-1.5 of Part I describes the objectives, modalities and a summary of results of the self-assessment process.
- 13. Section 1.3 has listed a useful list of analytical studies; drivers of deforestation and forest degradation, feedback and grievance mechanisms, land use and land tenure, communication strategy, benefit sharing, MRV /RL; SESA and the development of a REDD+ strategy.
- 14. Achievements that have been registered between 2013 and 2018 are listed below:
 - Development of an R-PP in 2013 and its approval in 2014
 - FCPF Grant funding for readiness preparation in 2015
 - A successful mid-term review in 2017 which recommended additional grant funding
 - Signing of additional grant funding in which laid the foundation for the national REDD+ Strategy
 - Development of studies and the publication of their findings- already listed
 - Elaboration strategy options in the forestry, agriculture, livestock, energy and mining sectors

Key Gaps identified during the self-assessment

The bullets below represent the areas under each of the five components where Sudan would like to do more work.

National and Provincial REDD+ Management Arrangements

- There is still insufficient technical and institutional capacities for the implementation and management of REDD+ at the state level, particularly in MRV, safeguards, grievance redress and others
- Unpredictability of resources to initiate and maintain REDD+ programs
- Weak history and systems for coordination and collaboration with all relevant institutions involved in the preparation for the REDD+ implementation phase
- Installing annual planning processes supported by predictable financial resources for REDD+ programs
- Creation of state-level platforms to facilitate regular stakeholder consultations and engagements, including reaching out to forest dependent communities and people at the local level
- Need to strengthen women's participation in general, particularly in decisionmaking at both at national and state levels,

REDD+ strategy and interventions

- Inadequate understanding of and potential involvement of the private sector in the REDD+ program
- Inadequate information of the impacts of mining on deforestation and forest degradation, including landscape restoration
- Absence of cost-benefit analyses of the proposed strategy option which will also call for the estimation of their emission reduction potentials
- Incorporation of REDD+ policies in overall national development planning and in other sector policies since for example; some natural resources related policies such as rangeland and wildlife do not fully support the REDD+ so remedial policies and measures are necessary
- Need to strengthen coordination between the established committees at the state level to ensure the implementation of the strategy options across the related sectors belongs to the section on implementation framework

Implementation Framework

Under this sub-component the key gaps or issue that need to be addressed

- Review of forest legislation
- Clarification of carbon rights
- Addressing trust deficits between the state and local communities in order to generate local acceptance of REDD+
- Need for clear benefit sharing arrangements
- A REDD+ Program and Carbon Registry

Social and Environmental Impacts

Despite Sudan's satisfaction with its own progress on this, the self-assessment revealed that under this sub-component, more work needs to be done in two main areas:

- Testing of the proposed environmental and social management framework
- Building capacity at state levels, starting with the state focal points on social and environmental safeguards and heir management.

Reference Emission Level and Monitoring Systems

While much has been done under this component according to the results of the assessment; there is still some work to be done. This includes the following:

- Capacity building of the technical working group on FREL/FRL to provide inputs into their construction
- Improvement in methodology and capacity for collection of activity and emission factors data, so that Sudan can move to the next tier level in the quality of its estimates

Monitoring Systems for Forests and Safeguards

A system for collecting information on safeguards is underway and expected to be completed by August 2018

The national forest monitoring system (NFMS) is still not complete but being supported by FAO and data availability remains inadequate

- Representation of sample plots in all selected areas is incomplete as a result of remoteness and insecurity concerns
- There is a need to improve the accuracy of collected data by way of intensification of sampling to reduce standard errors

Under next steps, Sudan has listed what is effectively a summarised version of the gaps which have been identified under all the components

Summary of the Sudan self-assessment process shown by component and subcomponents of the Readiness Framework

In summary, Sudan's self-assessment report has concluded that out of the 9 readiness subcomponents, 6 have seen sufficient progress to be rated green and only 3 need more work and rated yellow.

REDD READINESS COMPONENT AND SUB-COMPONENT	SUMMARY SCORE
Component 1. Readiness Organization and Consultation	
Sub-component 1a	
Sub-component 1b	
Component 2 REDD+ Strategy Preparation	
Sub-component 2a Assessment of land use, Land use changers, Drivers, Forest Law, Policy and Governance	
Sub-component 2b REDD+ Strategy Options	
Sub-component 2c Implementation Framework	
Sub-component 2d Social and Environmental Impacts	
Component 3 Reference Emissions Level/ Reference Levels	
Component 4 Monitoring systems for Forests and Safeguards	
Sub-component 4a National Forest Monitoring System	
Sub-component 4b Information System for Multiple Benefits, other Impacts,	
Governance and Safeguards	

Proposed REDD+ Readiness Preparation Action Plan

15. While the TAP generally agrees with the broad results of the self-assessment, including recommended remedial measures, it has added additional comments to each component.

PART B2. ASSESSMENT BY THE TAP

COMPONENT 1. READINESS ORGANIZATION AND CONSULTATIONS

Sub-component 1a. National REDD+ Management Arrangements (Criteria 1-6, Green)

- Accountability and transparency
 Operating mandate and budget
 Multi-sector coordination mechanisms and cross-sector collaboration
 Technical supervision capacity
 Funds management capacity
 Feedback and grievance redress mechanism
- 16. The institutional arrangements that Sudan has described are clear in terms of the management of REDD. In this regard, the presence of a functional Higher Council for Environment and Natural Resources (HCENR), the creation of the Program Management Unit (PMU), and its 5 technical working groups, the Technical Advisory Committee, a safeguard specialist are relevant, as is the presence of State Focal Points and their coordination committees.
- 17. From the self-assessment, stakeholders appreciate the level of accountability and transparency on REDD+ that is addressed under Criterion 1, even though some local community groups would like to see more.
- 18. Criterion 2 on operating mandates and budget has been well described in the R-Package and seems to have satisfied stakeholders during the self-assessment process.
- 19. On Criterion 3 on coordination Sudan has recognized this as an area where there are shortcomings and it is an issue that is linked also to policy reforms in sectors such as agriculture and wildlife and natural resources to support a national REDD+ program. A comprehensive strategy to effect functional co-ordination with a low-emissions policy framework is needed and sectors such as; as agriculture, mining, energy transport infra-structure and others are important in that regard.
- 20. On Criterion 4, on technical supervision capacity, the self-assessment by Sudan has observed that technical supervisory capacity is still insufficient, particularly in the 18 states ad ranges from the technical aspects of MRV, to benefit sharing and safeguards. It seems that a critical aspect of readiness is a well targeted and time bound capacity building plan. On Criterion 5, the assessment suggested sufficient capacity to manage funds and the additional as evidence of their efficient use of the initial grant and also Sudan has so far met its financial contribution to the readiness process.
- 21. On Criterion 6 it has been noted that a draft Feedback Grievance Redress Mechanism (FGRM) has been produced and what remains is for it to be tested as the self-assessment process has also recommended the same. It seems Sudan is quite pleased with what has so far been achieved
- 22. The TAP is of the opinion that the rating from the self-assessment is fair and that whatever needs to be worked on is clearly stated.
- 1b. Consultation, Participation, and Outreach (Criteria 7-10, Green)
 - 7) Participation and engagement of key stakeholders
 - 8) Consultation processes
 - 9) Information sharing and accessibility of information

- 10) Implementation and public disclosure of consultation outcomes
- 23. The self-assessment process described in the R-Package demonstrates a clear and structured system of consultations that Sudan has conducted at all levels for the purposes of awareness. For instance, the Forest National Corporation (FNC) has established consultation and participation platforms for civil society at national level and other such as the Gum Arabic Platform at sub-national levels. In addition Sudanese Environment Conservation Society is implanting a gender mainstreaming program alongside others who implement awareness and capacity building.

On Criterion 7 on participation, the R-Package has stated that private sector involvement is still lacking and is still one of the gaps that needs to be analysed and better understood.

- 24. No specific reference has been made on Criteria 9 and 10, except for a general statement that sufficient progress has been made under this sub-component, despite the need to improve mechanisms for access and information sharing among stakeholders.
- 25. Again consultations as far as was described in the R-PP and in this report would seem to be adequate and despite the gaps in the two preceding paragraphs, the rating is acceptable.

COMPONENT 2. REDD+ STRATEGY PREPARATION

2a. Assessment of Land Use, Land-Use Change Drivers, Forest Law, Policy and Governance (Criteria 11-15, Green)

- 11) Assessment and analysis of land use and land use change drivers
- 12) Prioritization of direct and indirect drivers/barriers to forest enhancement
- 13) Links between drivers/barriers and REDD+ activities
- 14) Action plans to address natural resource rights, land tenure, governance
- 15) Implications for forest law and policy
- 26. On Criteria 11, 12 and 13 is on drivers, and the in that regard, the R-Package states that comprehensive analyse of direct and underlying drivers of deforestation and degradation, were done and used to design the draft REDD+, Strategy Options. Except for agriculture, other direct and underlying drivers and whether, or how they differ in rank between the states or agro-ecological zones in Sudan, is not clear in the R-Package. However mention has been made that the work on drivers was published in a special report and it also covered what can be barriers to REDD+..
- 27. On Criterion 14, the R-Package has stated tin section 1a that a major gap is the absence of a carbon rights law which is also a crucial part of an implementation framework.
- 28. On Criterion 15, it has been stated that the policy and legal implications of the proposed strategy options were done but no summary on what those are, or a few examples, are not provided in the R-Package

29. In the absence of a carbon rights law, Sudan should be clear on its analysis on what it would take to have a carbon rights law in place. The TAP is of the perception that it will be included in the new forest legislation since Sudan will not develop a stand-alone REDD+ legislation. On this basis, the green rating is questionable. This is also an issue relevant to sub-component 2s.

2b. REDD+ Strategy Options (Criteria 16-18, Green)

- 16) Selection and prioritization of REDD+ strategy options
- 17) Feasibility assessment
- 18) Implications of strategy options on existing sectoral policies
- 30. Criteria 16 and 17 Sudan has proposed interventions in the agriculture, livestock, energy and mining sectors, in addition to the forest sector itself. The coverage of sectors that affect forestry or forest cover changes is appropriate. However the emission reduction potential of the options and cost-benefit analyses have not been done. To secure climate financing for Sudan, this is a gap that needs to be addressed, even though it may not negate the significant progress that has been registered.
- 31. On Criterion 18 the TAP notes that the R-Package has stated that each option has been analysed in terms of their policy implications and in that regard, the inconsistencies between strategy options and programs of related sectors (e.g. rangelands and wildlife sectors) have been identified. This suggests that the policy environment may not be conducive or all supportive of REDD+. This should be an issue of concern to Sudan's REDD+ Program. On this basis, one may question the green rating for Sub-component 2b.

2c. Implementation Framework (Criteria 19-22, Yellow)

- 19) Adoption and implementation of legislation/regulations
- 20) Guidelines for Implementation
- 21) Benefit sharing mechanism
- 22) National REDD+ registry and system monitoring REDD+ activities
- 32. On Criterion 19, Sudan has recognized a weakness in the fact that policies and legislation that exist are not explicit on REDD+ and while Sudan has no plans to create legislation specific to REDD+, it plans to review the current forest legislation and make it more supportive of emission reductions from the forest and related sectors.
- 33. On Criteria 20 and 21, the R-Package has adequately covered the key components of an implementation framework for REDD+ in Sudan (legislation, implementation guidelines, benefit sharing mechanism, a national registry for REDD+ and a monitoring system).
- 34. On Criterion 21, a benefit sharing mechanisms has been drafted and currently awaits testing through pilot projects, even though it has been recognized that the issue of carbon rights has been described is still missing.
- 35. The need for a REDD+ / carbon Registry has been recognized and prioritized for further action.
- 36. Based on the comments already made under sub-component 2a, the yellow rating is fair.

2d. Social and Environmental Impacts (Criteria 23-25, Green)

23) Analysis of social and environmental safeguard issues

- 24) REDD+ strategy design with respect to impacts
- 25) Environmental and Social Management Framework
- 37. On criterion 23 to 25, it is interesting that under section 3.1 of the R-Package the assessment of land use and tenure were key inputs into both the Social and Environmental Assessments associated with the strategy options but also in constructing an Environmental and Social Management Framework (ESMF)
- 38. On criterion 24 the social and environmental risks of the strategy options were analyzed but the R-Package falls short of stating the likelihood of each risk for purpose of prioritizing mitigation measures.
- 39. Despite the comment on the preceding paragraph, the green rating is justified.

COMPONENT 3. REFERENCE EMISSIONS LEVEL/REFERENCE LEVELS (Green)

26) Demonstration of methodology27) Use of historical data, and adjusted for national circumstances28) Technical feasibility of the methodological approach, and consistency with UNFCCC/IPCC guidance and guidelines

- 40. On Criteria 26, 27 and 28. In the R-package, Sudan is of the opinion that it has achieved significant progress in terms of methodology development under Component 3, and it is commendable that local institutions such as the University of Khartoum is involved. Capacity building is still needed though.
- 41. On Criterion 26 and 27, on demonstration of methodology, Sudan has set a reference period and has begun the collection of data under the supervision of FAO to follow a step-wise approach in line with UNFCCC and IPCC Guidelines and has identified 3 states representing 15 % of its land area
- 42. As far as the TAP can see, the green rating is acceptable.

COMPONENT 4. MONITORING SYSTEMS FOR FORESTS AND SAFEGUARDS

4a. National Forest Monitoring System (Criteria 29-31, Yellow)

- 29) Documentation of monitoring approach
- 30) Demonstration of early system implementation
- 31) Institutional arrangements and capacities Forests
- 43. On Criteria 29 and 30, it has been noted that Sudan has clearly stated and used its forest definitions based on a reclassification of the Africover 2010 map. However the chosen forest definitions, which was discussed within FNC and academia and was later endorsed by the Minister of Agriculture and Forestry. In addition it is evident that though much still remains to be done, the volume of preparatory work done is encouraging; field manual, quality control procedures, data management system (Open Foris) and procurements
- 44. On Criterion 31, on institutional arrangements for collaboration to collect data collection is not clear in the R-Package, bearing in mind that capacity for monitoring may not be found in any one institution.

4b. Information System for Multiple Benefits, Other Impacts, Governance, and Safeguards (Criteria 32-34, Yellow)

- 32) Identification of relevant non-carbon aspects, and social and environmental issues
- 33) Monitoring, reporting and information sharing
- 34) Institutional arrangements and capacities Multiple Benefits and Safeguards
- 45. In general, work relevant for Criteria 32 to 34 is planned in the current phase of additional funds that Sudan recently secured but suffice it to say that a road-map is in place and a comprehensive monitoring systems for multiple benefits, safeguards, governance should be in place by August 2019.
- 46. Since Sudan has described a clear roadmap to achieve the needed progress, the ratings on this component and sub-component are accurate.

SUMMARY ASSESSMENT AND RECOMMENDATIONS TO THE PC

- 47. It is the opinion of the TAP that the R-Package self-assessment process appears to have followed the recommended steps even though it was conducted over a relatively short period compared to other R-Packages. The process appears to have been well organized and there was a broad range of stakeholders who participated, including an impressive presence of female participants. The document is generally well-written and the key experiences and lessons learnt are clearly presented. The document is also quite clear on areas and issue that need more work and this is also clearly stated in the section of next steps, which has contains priority actions going forward. The TAP nonetheless has a few comments to add:
- 48. Based on the observations in the R-Package, cross-sector coordination of REDD+ at national and sub-national levels remains a big challenge and it is recommended that possible mechanisms that will encourage coordination are explored, as is the need to sort out policy conflicts that have already been identified. An approach that offers incentives to get sectors to collaborate could also be explored.
- 49. It seems that the work on drivers of deforestation and forest degradation needs more analysis in terms of how a particular driver may differ in rank among other drivers from one state or region, to another. From the R-Package, it is not clear which the underlying causes or indirect drivers were identified since they largely inform the design of strategy options This could be made more clear without going into too much detail in the R-Package
- 50. As already recognized in the R-Package the economic feasibility and the estimated emission reduction potential of strategy options should be given high priority since it is an important tool for fund raising for REDD+
- 51. For an arid and semi-arid country such as Sudan, it is surprising that climate change adaptation is not mentioned in the R-Package, even though REDD+ is primarily a mitigation vehicle.
- 52. While it is Sudan's objective to convert 10% under rain-fed and 5% of irrigated agricultural lands to forest, the social and environmental assessments associated with that should be explicitly stated.