

World Bank - Grant Reporting and Monitoring (GRM) Report

Report to Donor

Ref. TF099264
Printed On: 06/30/2021

Reporting Period: 08/31/2011 to 12/31/2020
Report Type: Completion Report
Status: Approved

Assignment: TF099264

FCPF Nicaragua Readiness Preparation Proposal - Formulation Grant

FCPFR - Forest Carbon Partnership Facility

Task Team Leader: 00000457984 - Philippe Dardel

Approving Manager: 00000253690 - Valerie Hickey

| Summary Information | |
|------------------------------------|-------------------------------|
| TF Status | LCLS |
| Recipient Country | Nicaragua |
| Executed By | Recipient |
| Managing Unit | 9272 - SLCEN |
| Grant Start Date / End Date | 08/31/2011 to 12/30/2020 |
| Original Grant Amount | 200,000.00 |
| Grant Amount | 8,800,000.00 |
| Outstanding Commitments | 0.00 |
| Cumulative Disbursements | 8,800,000.00 as of 12/31/2020 |
| Disbursed 07/01/2011 to 12/31/2020 | 8,800,000.00 |
| Donor | TF602001 - MULTIPLE DONORS |

This GRM report includes the following sections: Overview, Components, Outcome, Execution, Program (FCPFR), Completion, Disbursements, Procurement Plan, Procurement Actuals.

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OVERVIEW

Overall Assessments

Grant Objectives:

The objective of the grant's Formulation Activities is to assist the recipient, as a REDD Participant Country in the FCPF, to develop its Readiness Preparation Proposal (R-PP) on the basis of the Readiness Plan Idea Note and following the FCPF template for the Readiness Plan. Later stages of the grant may also assist with further development of R-PP components, thus helping the country to move toward 'REDD Readiness'.

Overall progress from 08/31/2011 to 12/30/2020 with regard to Achieving Grant Objectives:

Comment:

This GRM reports on the overall progress up to closure on December 31, 2020.

The PDO for the second and third installments of the grants (\$3.6M and \$5M) was to help the Recipient become ready for future ENDE - REDD+ implementation by preparing its key elements, systems, and/or policies needed, in a socially and environmentally sound manner.

The grants have helped achieve the PDO and allowed Nicaragua to make significant progress in establishing the foundations for REDD+ implementation.

- *Elaboration of REDD+ planning instruments* - With grant resources, the Ministry of the Environment and Natural Resources (MARENA) and partner institutions have:
 - o Elaborated the second version of the ENDE-REDD+ Strategy (focusing on the Pacific-Centre-Northern region).
 - o Successfully presented to the FCPF Carbon Fund, an Emission Reductions Program (ERP) for the Caribbean Coast, the BOSAWAS Biosphere Reserve, and the Indio Maíz Biological Reserve. The objective of this ERP is to reduce CO2 emissions by 11 M tons between 2020-2025 through the reduction by at least 50% of deforestation and forest degradation in the Costa Caribe area. It comprises an investment part, to generate emissions reduction through interventions that reduce deforestation and forest degradation, as well as a results-based payment mechanism against verified emission reductions - or Emission Reductions Payment Agreement (ERPA).
 - o Developed and disclosed the advanced draft Benefit Sharing Plan (BSP) associated to the ERPA, as well as the safeguards and the legal packages required for ERPA signing.
- *Development of a carbon accounting system.*
 - o Determined a Forest Reference Emissions Level (FREL) for the ERP area, submitted it to the United Nations Framework Convention for Climate Change (UNFCCC) to facilitate access to climate finance under the GCF, and established a robust methodology and protocol for future FREL updates; and
 - o Established a Monitoring, Reporting and Verification (MRV) system.
- *Safeguards and stakeholder engagement and participation.*
 - o Strengthened stakeholder engagement and participation through the REDD+ governance platform; and
 - o Established a Feedback Grievance Redress Mechanism (FGRM) and the Environmental & Social Standard related documents for ERP and BSP implementation.
- *REDD+ financing.*
 - o Developed and successfully submitted to the Green Climate Fund (GCF) an investment proposal - the Bioclima project - supported by the Central America Bank for Economic Integration (CABEI). It is consistent with the country's National Climate Change Policy and the NDC. This US\$ 64 million from GCF will contribute to closing the financial gap of the ERP.

In addition, through the REDD Readiness work, Nicaragua has prepared the infrastructure to participate at large scale in the Carbon market and enter into agreements with willing buyers.

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Overall progress from 08/31/2011 to 12/31/2020 with regard to Implementation of Grant Financed Activities:

Overall, implementation progress regarding the preparation of Nicaragua's REDD Readiness Package (R-Package) was satisfactory, despite delays and disruptions generated by the COVID-19 outbreak and two hurricanes in 2020. The activities that were planned have been completed.

Comment:

See details for each Component further below. Grant disbursements reached 100 percent of the funds by the closing date.

Implementation was coordinated by the Ministry of Environment and Natural Resources (MARENA), through the Project Management Unit (PMU). The REDD+ management structures included a three-level decision-making platform (policy, technical and general public).

Of particular significance has been the strong stakeholder engagement and participation through the REDD+ governance platform and throughout implementation. Indigenous Peoples and Afro-Nicaraguan representatives participated actively in both the policy and technical working groups of the Readiness process. In 2020, responding to concerns expressed by some CSOs on the country's social and political context with an emphasis on the rights of the indigenous peoples and afro-descendants, this engagement intensified through the implementation of a communication plan to increase and broaden awareness and understanding on the ERP while deepening the consultation of the targeted communities and relevant stakeholders. The process was made accessible to CSOs from inside and outside the country using virtual channels. Overall, more than 90 virtual and in-person consultation events for the preparation of the ER program took place, involving over 13,800 participants (of which 30% were women), including afro-descendants and indigenous peoples representatives, NGOs, and other stakeholders.

Grant follow-up and structure

Description and context of Grant:

Following the initial US\$0.2 million grant signed on August 22, 2011, there have been two successive Additional Financing of, US\$3.6 million and US\$5 million, signed on December 24, 2013 and April 11, 2018, respectively, hence resulting in a total grant of US\$8.8 million. The current Grant supports the implementation of Reduced Emissions from Deforestation and Forest Degradation (REDD+) Readiness activities as per the Readiness Preparation Proposal approved by the FCPF.

To achieve the objective, the activities have been organized along the following components and related planned outputs:

Component 1. Organization, Consultation, and Grievance Redress. Planned Outputs: The ENDE-REDD+ Strategy and draft Feedback Redress Mechanism consulted.

Component 2: ENDE-REDD+ Strategy development.

Component 3: Forest Reference Emissions Level (FREL) development.

Component 4: National Forest Monitoring System (NFMS) design.

The implementation end period was affected by the COVID-19 outbreak and two hurricanes (Iota and Eta) in 2020.

Expected follow up (if any): Expected Bank support after closure is limited to further capacity support on MRV in 2021.

Comment on follow up:

Planned activities have been successfully implemented. As indicated, implementation of the strategy was expected to comprise two key parts: the investments to generate emissions reduction and the results-based payment mechanism against emission reductions. On the former, the Government of Nicaragua will implement the investment portion of the strategy through the Bioclima Project with support from the GCF and CABEI. It was approved by GCF in November 2020. On the latter, an Emission Reductions Payment Agreement (ERPA) with the World Bank was eventually not signed, as envisaged, in 2021. However, through the REDD Readiness work, Nicaragua has prepared the infrastructure to enter into other agreements with willing buyers. Expected follow up with Bank support in 2021 includes further capacity support on MRV.

End Date of Last Site Visit: September 2019. In 2020, due to the COVID-19 outbreak, all in-country missions were cancelled. The Bank's team continued close support and supervision using virtual channels.

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Restructuring of Grant:

Following the Government's request dated April 27, 2020, in the COVID-19 outbreak context, the Closing Date of the grant was extended by six months to December 31, 2020.

OUTCOME

Comments on outcome achieved from 08/31/2011 to 12/30/2020

See above section on *Overall progress from 08/31/2011 to 12/30/2020 with regard to Achieving Grant Objectives.*

Grant Outcome Indicators

No Outcome indicators were defined or used for this grant.

COMPONENTS

Comments on planned and actual Output

1. Organization, Consultation, and Grievance Redress

Status: Completed
Planned Output: The ENDE-REDD+ Strategy and draft Feedback Redress Mechanism consulted
Actual Output: See below

2. ENDE-REDD+ Strategy development

Status: Completed
Planned Output: First version of the ENDE-REDD+ Strategy, draft SESA Report, draft ESMF, draft Indigenous Peoples Plan, and draft Involuntary Resettlement Policy completed
Actual Output: All generated and made public or disclosed (see below)

3. Forest Reference Emissions Level (FREL) development

Status: Completed
Planned Output: First version of the FREL finalized
Actual Output: FREL finalized and submitted to UNFCCC in 2018

4. National Forest Monitoring System (NFMS) design

Status: Completed
Planned Output: Finalize a first version of the MRV system
Actual Output: see below

Comment on component implementation progress

Nicaragua, through the Project Management Unit (PMU) at MARENA, has made satisfactory implementation progress on REDD+ readiness preparation by building on the country's effort to grant land rights to Indigenous and Afro-descendant Communities.

(a) *Component 1 - Readiness Consultation and Organization.*

- (i) *Subcomponent 1a: National REDD+ Management Arrangements.* The PMU at MARENA has implemented the REDD+ funding and coordinated REDD+ activities. Hence, MARENA has coordinated the REDD+ National Management Platform, comprised of the main national government institutions involved in land-use change, including the Ministry of Family Economy (MEFCCA), the National Forest Institute (INAFOR), the Secretary for the Development of the Caribbean Coast (SDCC), and the Secretary of the Presidency for Public Planning (SPPP). The National

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Management arrangements have also included the Northern and Southern Caribbean Coast Regional Autonomous Governments and 23 Indigenous and Afro-descendant Governments. Similarly, MARENA has coordinated the Monitoring, Reporting, and Verification (MRV) roundtable, which involves INAFOR and the Nicaraguan Institute for Territorial Studies (INETER). In addition, MARENA has been responsible for managing inquiries, complaints, and potential grievances by stakeholders, and has organized information sharing and stakeholder consultation and participation. The REDD+ Management Platform has been divided in three Groups: The steering committee, integrated by authorities of the above institutions; the technical working group composed by technical-level representatives of these institutions; and a broad based group of stakeholders who participate in the consultations. MARENA has demonstrated adequate capacity to manage the REDD+ Management Platform and reported over 13,800 participants during implementation.

- (ii) *Subcomponent 1b: Consultation, Participation, and Outreach.* MARENA has regularly engaged with key stakeholders and facilitated their participation in the REDD+ preparation process, including on activities related to the national REDD+ Strategy, the ERP, reference levels, and the MRV system. Consultation and participation of key stakeholders has built on early dialogues organized during the implementation of the original grants, and the consultation, participation, and outreach undertaken as part of the Strategic Environmental and Social Assessment (SESA). MARENA has engaged marginalized groups, including forest-dependent women, youth, Indigenous Peoples and Local Communities. MARENA has also developed a Communications Plan to ensure there is constant exchange of information with the public, through different means.

(b) Component 2 - REDD+ Strategy Preparation.

- (i) *Subcomponent 2a: Assessment of Land Use, Land-Use Change Drivers, Forest Law, Policy and Governance.* MARENA conducted in-depth assessments to identify key drivers of deforestation and forest degradation, as well as activities concerning conservation, sustainable forest management, and enhancements of forest carbon stocks. The assessments also dealt with shortcomings and solutions regarding land use as well as economic, legal, policy and governance settings as they contribute to the drivers of deforestation and forest degradation. The Readiness Grant contributed to strengthening INAFOR's National Forest Program, which informed the country's REDD+ strategy and identified ways to address the priority drivers of deforestation and forest degradation.
- (ii) *Subcomponent 2b: REDD+ Strategy Options.* MARENA and the National Management Platform developed the first version of the ENDE REDD+ Strategy, which focused on options to address deforestation in the Caribbean Coast Regions, the BOSAWAS biosphere Reserve, and the Indio Maíz Biological Reserve. This Strategy has formed the basis for the development of a set of policies that integrated the ERP focusing on the Caribbean Coast, the BOSAWAS Biosphere Reserve and the Indio Maíz Biological Reserve. The FCPF Carbon Fund accepted the ERP in July 2019. The second version of the REDD+ strategy was then developed to include the Pacific-Central-Northern (PCN) part of the country. It incorporates the analytical work undertaken in Subcomponent 2a to address the drivers of deforestation and forest degradation, including those linked to the livestock sector, in the context of the national priorities for sustainable development, the National Climate Change Policy, and the Nationally Determined Contributions to the climate change mitigation goals of the Paris Agreement. Finally, the strategy of the Secretariat for the Development of the Caribbean Coast was also updated to include REDD+ dimensions.
- (iii) *Subcomponent 2c: Implementation Framework.* MARENA has defined institutional and legal arrangements to implement the ERP, which drive the implementation arrangements for the REDD+ Strategy. The institutional arrangements define the role of government, landowners, and other participants in REDD+ transactions to share and deliver REDD+ benefits, respecting the rights of Indigenous Peoples and forest-dependent communities, and to manage carbon transactions through transparent process. MARENA has also promoted the adoption of legislation to adopt the Benefit Sharing Plan (BSP); defined carbon rights and sought the opinion of the General Attorney about the adopted definitions; defined Benefit Sharing mechanisms and financial modalities; and developed and piloted a Feedback Grievance Redress Mechanism (FGRM).
- (iv) *Subcomponent 2d: Social and Environmental Impacts.* MARENA assessed the environmental and social impacts of the priority REDD+ Strategy Options to develop the REDD+ Strategy and the stand alone Environmental and Social Management Framework (ESMF). The latter is meant to address the environmental and social impacts of the REDD+ Strategy and the ERP, in compliance with the Bank's Environmental and Social Standard (ESS). The ESMF was completed based on consultation with *inter alia* Indigenous and Afro-descendant peoples. MARENA has also created an institutional structure to ensure effective management of social and environmental issues.

- (c) *Component 3: Forest Reference Emissions Level (FREL) Development.* MARENA has developed a methodology and protocol to determine the FREL both at the national level and for the ERP accounting area. The MRV roundtable estimated changes in forest area and carbon content over time and the corresponding emissions: they are meant to be used to measure performance of REDD+ policy interventions relatively to the FREL. MARENA submitted the National FREL to the United Nations Framework Convention on Climate Change in January 2018.

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(d) Component 4: Monitoring Systems for Forests, and Safeguards.

- (i) Subcomponent 4a: *National Forest Monitoring System*. The MRV roundtable developed, in a participatory fashion, a system capable of generating information that allows comparison of changes in forest area and carbon content relatively to the FREL. However, the development of an operational forest monitoring system will require a long-term effort that combines remote sensing and field-based data collection from the national forest inventory.
- (ii) Subcomponent 4b: *Information System for Multiple Benefits, Other Impacts, Governance, and Safeguards*. MARENA has developed a system to monitor priority non-carbon benefits such as biodiversity conservation and creation of employment. The system will also allow to monitor, report, and share information regarding implementation of the safeguards plans.

Procurement, Financial Management, and Safeguards performance have been satisfactory.

EXECUTION

Bank project related to the grant

| | |
|--------------------|------------------------------------|
| Project ID / Name: | P120657 - NI FCPF REDD Readiness |
| Project Status: | Lending |
| Global Focal Area: | Climate change |
| Product Line: | RE - Recipient Executed Activities |

Implementing agency and contact details

| | |
|----------|---|
| Agency: | Ministry of Environment and Natural Resources (MARENA) |
| Contact: | Ms. Esperanza Rodriguez, Director, General Planificación, Cooperación Externa y Proyectos |
| Address: | Frente a la Zona Franca Las Mercedes, Managua, Nicaragua |
| Phone: | +505 22631273 |
| Email: | erodriguez.marena@gmail.com |

PROGRAM

Program Specific Questions

1. Describe progress in how the Grant activities are being coordinated with other REDD+-related initiatives

There are no other REDD+ initiatives in Nicaragua. However, MARENA is coordinating REDD+ activities with the Ministry of Family Economy, the Caribbean Coast Development Secretariat, and the Regional Governments of the Northern and Southern Caribbean Coast Regional Governments. CABEI has been supporting the Government in preparing the Bioclima Project (and now implementing it). Also, the GIZ program in support of REDD+ in Central America has developed direct technical collaboration with MARENA and INAFOR.

2. Describe any important changes in the technical design or approach related to the Grant activities.

No changes to report.

3. Describe progress in addressing key capacity issues (implementation, technical, financial management, procurement) related to this Grant.

Overall, MARENA used the resources from the grant to address the capacity needs of the government institutions, the Caribbean Coast Development Secretariat, the Southern and Northern Caribbean Coast Regional Governments, and the Indigenous Territorial Governments.

4. Describe progress in addressing social and environmental issues (including safeguards) related to the Grant. Is the SESA conducted in accordance with the Common Approach?

MARENA applied the safeguards policies in elaborating the Readiness Strategy and the ERP in accordance with the FCPF's Common Approach. The Social and Environmental Strategic Assessment (SESA) guided the formulation of the National Deforestation Strategy (ENDE-REDD+). The SESA was developed in accordance with the Common Approach of the FCPF, which ensures that different

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delivery partners of the FCPF apply the most stringent safeguards in areas where they differ. During the preparation of the Environmental and Social Standard Instruments, it was agreed that other partners, for instance the BIOCLIMA project, would apply the World Bank's Environmental and Social Standards (ESS)¹. The package also includes a Guide to manage pests and contamination, a Guide for Forest Management, a Biodiversity Management Guide, and a Benefit Sharing Plan (BSP). During the implementation of the project, MARENA ensured that consultations with indigenous and Afrodescendant communities were done in a culturally appropriate way, using local languages and interpreters, ensuring the participation of women, involving representative bodies and councils of elders from indigenous and Afrodescendant communities from the 23 existing indigenous and Afrodescendant territories of the Caribbean Coast of Nicaragua and the Alto Wangki Bocay Basin, and provided time and channels for stakeholders to discuss and propose recommendations for the decisions making process.

5. Is the ESMF prepared in accordance with the Common Approach?

Yes².

6. Describe progress in stakeholder consultation, participation, disclosure of information, and the FGRM related to this Grant.

MARENA carried out the consultations in the Caribbean Coast and the Pacific-Center-Northern regions of the country to complete the REDD+ Strategy. Following Bank's guidance, it developed and implemented a Communication Plan meant to further deepen consultation and information processes, in particular with local stakeholders and communities. No grievances related to the technical assistance were registered. Concerns were taken up during public consultations and informed the elaboration of the Environmental and Social Standards Instruments of the ERPA project. More than 90 virtual and in-person consultation events for the preparation of the ER program took place, including events specifically aimed at getting stakeholder feedback on the drafts of the environmental and social risk management instruments (collectively, "E&S Instruments"). Consultations involved over 13,800 participants of which 30% were women, including afro-descendants and indigenous peoples representatives, NGOs, and other stakeholders. See <http://www.marena.gob.ni/Enderedd/memorias-talleres-ende-redd/>.

COMPLETION

Overall Assessments and Lessons Learned

Main lessons learned:

The participatory process behind the formulation of the National Strategy has once again demonstrated the importance of technical support and multi-sector collaboration at both the design and implementation stage - and bearing in mind the scale and the innovative nature of the program. Consultation information and dialogue on the content of the REDD+ process was key in ensuring the participation of multiple stakeholders at different levels, and in turn, related relevance of, and ownership over the strategy.

As a result of this process, communities' expectations rose high in terms of potential benefits from REDD+ implementation going forward, including through an ERPA. However, the social and governance risks to ERPA implementation tended to increase in the country in 2019 and 2020 and, despite the efforts deployed to design risk mitigation solutions, the ERPA was not signed with the World Bank after the grant closed. Retrospectively, while the evolving risk context made it challenging to better balance this issue, the mobilization of separate investment resources (through CABEL's Bioclima project and the World Bank's post-hurricane emergency projects) may have softened stakeholders' potential disappointment.

While the COVID-19 Pandemic created obstacles to implementation, new remote working practices, using existing web-based communication platforms, helped addressing these.

Overall outcome (and its Sustainability):

Comment:

The REDD+ Readiness support allowed for the establishment of the main REDD+ institutions and tools needed to move to the next phases including investments and the preparation for the potential results based payments: safeguard instruments, Feedback and Grievance Redress Mechanism, MRV System, the FREL and the BSP of the ER Program. The implementation of the GCF and CABEL

¹ The ESS instruments are the Environmental and Social Commitment Plan (ESCP), the Environmental and Social Management Framework (ESMF), the Labor Management Procedure (LMP) with its Grievance Mechanism, the Process Framework (PF), the Indigenous Peoples and Afrodescendant Planning Framework, the Guide for managing cultural heritage, and the Stakeholder Engagement Plan (SEP).

² This refers to the Common Approach that was agreed for FCPF with the Participants Committee in 2011 to ensure that other Delivery Partners follow safeguards that are equivalent to the Bank's safeguards.

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supported Bioclima Project will contribute to implement the national strategy on the investment side. However, building on these institutions and tools will also depend on Nicaragua's interest in, and capacity to sell Emission Reductions to willing buyers on the voluntary Carbon market. Even then, the innovative nature of such a mechanism would call for quality technical guidance during implementation.

Bank Performance:

Comment:

The overall Bank Performance was Satisfactory, based on quality at entry, project supervision and resource mobilization. Regular supervision missions were organized and documented (Aide-Memoire), Non-Objections were provided to the client under reasonable timeframes, and regular reporting was done to the Bank and donors. The Bank team provided close support and technical advice throughout implementation of the grant financed activities. As social and governance related risks tended to rise towards the end of implementation due to the evolving country context, the Bank team also provided useful guidance to the Client on how to address these (e.g. enhanced communication plan).

Additional Assessment

Development / strengthening of institutions:

Comment:

The capacity of MARENA and REDD+ platform related institutions, including at local level, has been significantly strengthened on all related aspects (strategic analysis and understanding of issues and solutions, safeguards, legal framework, institutional mechanisms, and monitoring tools).

Mobilization of other resources:

Comment:

See earlier comments about the Bioclima Project and the opportunities to build on the results to sell emission reductions to willing buyers.

Knowledge exchange:

Comment:

The Nicaragua REDD+ team has been a part of various learning events on REDD+ supported by the FCPF and other sources.

Client's policy / program implementation:

Comment:

The results generated with grant support are closely aligned with the country's policies, and, in that context, have directly contributed to developing the national strategy and the ERP. The Bioclima Project is now under implementation.

Efficiency :

Comment:

Outcomes planned at the onset have been largely achieved, in a timely manner, thus efficiency is rated satisfactory.

Replicability:

Comment:

During REDD+ preparation, Nicaragua developed processes for engagement and coordination between local communities, national and regional authorities, and the civil society. In addition to gleaning insights for follow-up participatory processes and future interinstitutional initiatives in the country, the actions taken also serve as an example to other countries. Furthermore, the ENDE - REDD+ strategy, the safeguard instruments, the MRV systems, as well as related national arrangements provide possible guidance to other countries on REDD+ implementation.

Main recommendations to stakeholders:

Considering the high poverty and vulnerability of the targeted populations (as revealed after the hurricanes Iota and Eta in 2020), explore the opportunity for additional, traditional investments in these areas, while promoting the rights and welfare of the indigenous peoples and the Afro-descendants.

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Building on the systems and capacities developed during REDD+ preparation, explore alternative opportunities on the voluntary Carbon market.

Main recommendations to Bank Management:

In line with the recommendations to Stakeholders, and considering the high poverty and vulnerability of the targeted populations, as well as the expectations raised by the REDD+ preparation process, explore the opportunity for additional - potentially more traditional - investments for these areas.

Building on the country's strong interest in Climate Change matters, as well as the systems and capacities developed during REDD+ preparation, consider additional guidance to the Client to explore alternative Carbon market opportunities.

DISBURSEMENTS

Disbursements Summary in USD

| Date From | Date To | Planned Cumulative | Planned Period | Actual Cumulative | Actual Period |
|------------|------------|--------------------|----------------|-------------------|---------------|
| 07/01/2011 | 12/31/2011 | 0.00 | 0.00 | 40,000.00 | 40,000.00 |
| 01/01/2012 | 06/30/2012 | 0.00 | 0.00 | 122,846.99 | 82,846.99 |
| 07/01/2012 | 12/31/2012 | 0.00 | 0.00 | 168,839.82 | 45,992.83 |
| 01/01/2013 | 06/30/2013 | 0.00 | 0.00 | 200,000.00 | 31,160.18 |
| 07/01/2013 | 12/31/2013 | 0.00 | 0.00 | 199,185.14 | 814.86- |
| 01/01/2014 | 06/30/2014 | 0.00 | 0.00 | 577,525.63 | 378,340.49 |
| 07/01/2014 | 12/31/2014 | 0.00 | 0.00 | 831,320.48 | 253,794.85 |
| 01/01/2015 | 06/30/2015 | 0.00 | 0.00 | 1,008,812.42 | 177,491.94 |
| 07/01/2015 | 12/31/2015 | 0.00 | 0.00 | 1,423,763.78 | 414,951.36 |
| 01/01/2016 | 06/30/2016 | 0.00 | 0.00 | 2,025,230.80 | 601,467.02 |
| 07/01/2016 | 12/31/2016 | 0.00 | 0.00 | 2,387,612.31 | 362,381.51 |
| 01/01/2017 | 06/30/2017 | 0.00 | 0.00 | 3,125,480.03 | 737,867.72 |
| 07/01/2017 | 12/31/2017 | 0.00 | 0.00 | 3,800,000.00 | 674,519.97 |
| 01/01/2018 | 06/30/2018 | 0.00 | 0.00 | 4,399,999.98 | 599,999.98 |
| 07/01/2018 | 12/31/2018 | 0.00 | 0.00 | 5,864,461.39 | 1,464,461.41 |
| 01/01/2019 | 06/30/2019 | 0.00 | 0.00 | 6,458,635.26 | 594,173.87 |
| 07/01/2019 | 12/31/2019 | 0.00 | 0.00 | 8,325,781.08 | 1,867,145.82 |
| 01/01/2020 | 06/30/2020 | 0.00 | 0.00 | 8,688,774.83 | 362,993.75 |
| 07/01/2020 | 12/31/2020 | 0.00 | 0.00 | 8,800,000.00 | 111,225.17 |

PROCUREMENT PLAN

None

PROCUREMENT ACTUAL

None