

Response matrix for TAP comments of 9 February 2013

Sub-component 1a: National Readiness Management Arrangements (Largely met)

TAP comment ¹	Summary of action(s) taken
<i>Comments Noted in First TAP Review that are yet to be addressed</i>	
1. The document provides a background, and then discusses directly each of the institutions, without providing an overall structure. It makes it hard to understand, particularly for non-experts.	Sub-component 1a has been re-organized to improve its readability. It has also been updated to reflect recent changes in the organizational structure for REDD+ (see footnote 2 of R-PP)
2. Figure 1 (12) is not in the document. Figure 2 (14) is not numbered in Component 1, and the first figure in Component 1b is numbered 2. Please include and cite figures and tables correctly.	All figure and table numbers have been corrected.
3. Clarify further the role of Provincial Governments. Confirm whether a jurisdictional or project based approach will be taken in PNG.	PNG has been following a jurisdictional approach to REDD+ and will continue to do so. Text has been revised to clarify this aspect (see Section 2a.5.c, p. 48)

Sub-component 1b: Information Sharing and Early Dialogue with Key Stakeholder Groups (Met)

TAP comment	Summary of action(s) taken
<i>Comments Noted in First TAP Review that are yet to be addressed</i>	
4. On Figure 4 page 23, the numbering of Enga, Southern Highlands and Eastern Highlands do not correspond to numbering on the map	Figure 5 (formerly figure 4) has been revised accordingly (p. 23)

Sub-component 1c: Consultation and Participation Process (Largely Met)

TAP comment	Summary of action(s) taken
<i>Comments Noted in First TAP Review that are yet to be addressed</i>	
5. Add information on past consultation actions, a summary of results, how these have influenced adaptation of current practice and how proposed future actions flow on from these.	Past consultations, results and implications for R-PP design are now summarized in Section 1b.2 (which seemed a better location than 1c) and Annex 1b. They have also been taken into account in designing the workplans for 1b and 1c.

¹ Numbers highlighted in TAP comments refer to page #(s) of latest draft R-PP.

Sub-component 2a: Assessment of Land Use, Forest Law, Policy and Governance (Partially Met)

TAP comment ²	Summary of action(s) taken
<i>Comments Noted in First TAP Review that are yet to be addressed</i>	
6. You may want to shorten the timeframe for production of the drivers analysis as this is a foundational element for defining abatement options and mitigation actions.	Budget for the drivers analysis is now concentrated in the first two years of R-PP only. (p. 50)
7. In the section on ILG and land law clearly explain that the current R-PP is not yet recommending a particular approach for recognizing carbon ownership and entitlements but that this will be an outcome of the proposed review.	A discussion of the issue of carbon rights and ownership has been added (see sub-section 2a.5.c, pp. 47-48). This includes discussion of a recent review of the carbon rights issue undertaken with GIZ support.
8. Explanation on how the issue of carbon rights would be resolved during Readiness preparation would be helpful.	See new sub-section 2a.5.c (p. 47-48) discussing the carbon rights issue.
9. You may want to adopt a jurisdictional approach to REDD+ in PNG based on wards or districts to ensure that planning for REDD+ project follows existing administrative and land tenure guidelines in PNG law.	See new text under last para. of 2a.5.c. (p.52)
10. Jobs are provided to only 9000 persons. 2.8 million log volume harvested in 2009 goes up and down consistent with global demand as affected by global economy. A major goal is to increase reforested area from 62,000 ha in 2008 to 240,000 ha by 2030. This seems too small to make a dent on carbon emissions since the annual deforestation rate was at 427 thousand ha between 2005-2010. Would this be enough to support the 2030 and 2050 plans?	A substantially greater percentage of the hoped for ‘dent’ in carbon emissions is expected to come from a reduction in rates of deforestation and degradation (REDD+’s two d’s) rather than from reforestation activities <i>per se</i> . This is in part because, as noted in the R-PP (p. 42), there are significant tenure and socio-economic barriers to more rapid expansion of plantation forestry.
11. Forestry and Climate Change Framework for Action 2009-2015 is set to outline the priorities regarding sustainable development in the forestry sector. Seems like a daunting challenge to address the large deforestation rate (DR). Plus the goals that have been set for 2030 appear too low to reduce the DR. One question is how much funding does PNG receive from the exports and is there a way to compensate that through logging in reforested areas or requiring that after deforestation the exposed land be reharvested with trees that have faster growth rates?	<p>The Government of PNG acknowledges that it is setting ambitious targets. Of course, its ability to meet these targets will depend on a variety of factors, including the ability to attract technical and investment capital support, as well as the strength of the enabling institutional policy environment which can be developed.</p> <p>As far as the FCCFA is concerned, while it covers about 12 million ha of land covered under the Forestry Act, achieving deforestation and degradation reduction targets will involve other sectors as well. For example, the conservation sector aims to protect up to 20% by 2030. REDD+ actions done outside of these two sectors should contribute further.</p> <p>As far as incentives for reforestation, there are existing levies from round log exports which are meant to be used for reforestation. It would be worth examining the effectiveness of these and developing ways in which they could be made more effective.</p>
12. About documenting past successes and failures, there are indications scattered in the document, but a summary could be useful (possibly in a Box?).	See matrix added, p. 48-49
13. PNG passed two pieces of land legislation in 2009 which came into effect in March 2012. However, OCCD does not appear to have accounted for the land reform laws that have taken place in March 2009. Thus the office is referring	Two amendments made to the Land Groups Incorporation Act were passed by Parliament in 2009. A description of these is provided in section 2a.4.d (p.36-38) of the R-PP.

² Numbers highlighted in TAP comments refer to page #(s) of latest draft R-PP.

TAP comment ²	Summary of action(s) taken
to out dated land laws. Please check the new land reforms and reformulate the land use and ownership discussion.	
Details	
<i>Forest inventory and deforestation and forest degradation</i>	
14. ‘The cumulative change (which is in line with the annual rate of deforestation reported by PNG to FAO) has been further elaborated with a socio-economic model to support the definition of a forest loss trend which report for 2002 a combined annual rate of deforestation and degradation of 1.41 percent (p27)’ – what socio-economic model?	The model in question (see Shearman et. al, 2008) looked at individual drivers and estimated annual changes due to same. This discussion has now been expanded and moved to a new section 2a.2, on land use drivers (see also comment 16 below) beginning on page 31.
15. ‘Additional conclusions of the report.. (p27) – what report?’	Reference to Shearman et. al (2008), has been added to text (p.33)
16. ‘While further studies are needed, the main drivers of this deforestation and forest degradation are..(p27) – this could be a section on its own with more detail given (with % too), in addition to reference.	Please see new section 2a.3 beginning on page 31 of revised draft.
<i>Lease leaseback arrangements: agriculture leases</i>	
17. For consistency, there needs to be a section detailing also this form of alienation	Sub-section organization under 2a.4, land use and ownership in PNG, has been revised to enhance clarity
<i>The forestry sector</i>	
18. Sources of information are missing, in particular for: ‘Of the country’s total logs harvested, 80 percent is exported as round logs while 20 percent or less is processed locally (p 30)’	Reference added (see p. 40, note 53).
19. ‘Reforestation (p 35)’ is not listed among ‘Commercial Operations,’ so it’s not clear what it refers to Policy and Legal framework for REDD+	Sub-section 2a.4 has been reorganized in light of this comment
<i>Overview of PNG Legal system</i>	
20. ‘Tribal conflicts are a major cause of tensions in the highlands region and often related to resource developments’ (p 36)- what does ‘resource developments’ refer to? Lack of access to development? Exploitation of resources?	See added text and reference, p. 42.
<i>Natural resource use and management</i>	
21. ‘In September 2009, for example, the Minister for Forests announced that no new FMA timber concessions would be allocated with round log export entitlements (p 39) – reference needed: was it a moratorium? Is it still in force? Is it enforced?’	This refers to a Ministerial Statement made in 2009, according to which, as of 2010, new FMAs (Forest Management Agreements) will have to undertake 100% downstream (local) processing. Projects under FMAs beginning prior to 2010 were not subject to this requirement can continue, but this only applies to new FMAs starting January 2010. Have added reference (see p. 46 and ref. 67).
22. ‘All are likely to have major impact on timber supply markets in general and in timber producing countries like Papua New Guinea in particular (p 40) – in what sense? Is it related to the fact that the above mentioned round log export ban is not enforced?’	Clarification added to text, including new footnote (#69)

TAP comment ²	Summary of action(s) taken
<i>Additional comments³</i>	
23. p28: PNG population (Section 2a.1). The population the mid-2011 census was 7.0 million; The pop growth rate for the periods 1980-2000 and 2000-2011 was almost identical (2.7-2.8% pa). So the estimated mid-2012 PNG population is 7.2 million; and the estimated mid-2013 population would be 7.4 million.	Population estimate has been revised (p.31)
24. p31: 97% of PNG land is in customary ownership still is questioned by the SABL disbursements. See discussion by Filer et al on this.	<p>Despite the acknowledged problems with the SABL process, land allocated for agricultural purposes remains technically under Customary ownership. As a result, this statistic may remain correct, strictly speaking.</p> <p>In such cases, land owners represented by their ILG Chairman sign SABLs with project developers. Filer correctly noted the argument surrounding the process of land allocation under the SABLs, which relates specifically to the consultative role of the ILG chairman in the process.</p> <p>The 2009 Amendments to the ILG Act now provides for a more stringent approach, where by full consent must be granted by all customary landowner members before the ILG subjects their land for any development.</p>
<p>25. p39: The full citation for Bourke and Harwood (2009) is:</p> <p>Bourke, R.M. and Harwood, T. (eds) (2009). Food and Agriculture in Papua New Guinea. ANU E Press, The Australian National University, Canberra.</p> <p>http://epress.anu.edu.au/food_agriculture_citation.html</p> <p>http://ips.cap.anu.edu.au/ssgm/resource_documents/lmg/png_ag_tables/</p> <p>Note that the published is ANUE E Press, not ANU Press</p>	Corrections made
26. p39: Note that it is Bourke and Harwood, Not Bourke and Hardwood. Give the page numbers for the information that they are citing, as this is a long (ca 650 page) book.	Spelling correction noted. Page number could not be determined.
27. The document should be updated to take into account the new draft National Forest Plan.	The document acknowledges the importance of the NFP, which is a document that is revised and updated approximately every five years. The latest update of the NFP has not yet completed what can be a fairly lengthy review process, including Cabinet approval. For this reason, it has not been taken into account in the present document. However, once the revised NFP is adopted, REDD+ strategies will need to updated accordingly.
28. The absence of a coherent drivers of DFD analysis is a serious shortcoming of the document. This could be remedied by adopting the 2009 report on drivers by Filer commissioned by DEC.	As noted above, a new section (2a.3) on analysis of drivers has been added to the document. This section refers to existing studies such as Shearman (2008), Filer (2009) and OCCD (2012). However, it acknowledges that additional work is needed to arrive at firm conclusions in this area. Such work is currently underway as part of the UN-REDD effort, and will be complemented by work to be financed under the R-PP.

³ The TAP review listed the following comments under 2b; however, they refer to sub-component 2a. They have therefore been moved to the latter matrix here.

Sub-component 2b: REDD-plus strategy Options (Partially Met)

TAP comment ⁴	Summary of action(s) taken
	<i>Comments Noted in First TAP Review that are yet to be addressed</i>
29. The relation between the four major policies/plans (Vision 2050, CCDS, IAP, and NCCDP) is not clear – why are there three of them? What makes them different one from the other? An initial list of the policies would be useful.	Please see revised section 2b.2 (pp. 53-60).
30. (50): ‘The number of jobs created in new sectors, such as tourism and forest management, should more than outweigh those lost in the traditional logging sector’ – this is potentially a sensitive statement. If there is no reference, it needs to be made clear that additional studies are needed, and possibly included in the R-PP	Please see revised last para. of section 2b.2 (p. 60).
<p>31. (a) You may want to consider applying a standard of independently verified certification of sustainable forest management (e.g. Forest Stewardship Council) in order to meet UNFCCC guidelines, to ensure compliance with Lacey and FLEGT requirements and to overcome negative perceptions of PNG forest management.</p> <p>(b) ‘The NEC has endorsed the main elements of the national CCDS.’ (48) – Why ‘main elements’? Wouldn’t the NEC have endorsed the entire CCDS?</p> <p>(c) Stopping deforestation from agriculture leases (54) – this section doesn’t appear consistent with the part in the previous chapter on the Commission of Inquiry</p>	<p>(a) We realize that the TAP is simply offering a suggestion here. REDD+ Readiness in PNG is being developed in line with evolving UNFCCC guidance. It is worth noting that, to date, this guidance does not specify FSC or other similar certification requirements.</p> <p>(b) The main elements referred to here were endorsed in NEC Decision 5/2010 and are those prioritized for national implementation so that immediate budgetary allocation can also be disbursed internally to support. The fact that these main elements have been specifically endorsed for priority implementation means in effect that the whole document has been endorsed.</p> <p>(c) As described in the R-PP, 670,000 ha of approved agricultural leases were given ‘with full approval from PNGFA and DEC’. However, as noted elsewhere, there has been ‘rampant abuses’ of the laws, regulations and procedures concerning the granting of these leases. This is in large part because the government trusted the intentions of developers as explicitly written out within their proposals for agricultural development. However, following approval, many developers focused only on deforestation without making agreed investments in agricultural development. As a result, it was concluded that these SABL projects were designed to deforest land under the pretext of agricultural development. In doing so, they abused the existing compliance and approval government process. As a result of these developments, a top priority for REDD+ is to prevent further deforestation associated with ‘agricultural’ leases.</p>
Additional Comments⁵	
32. p54: Study by NARI on alternative livelihoods options for forest-dependent communities (\$530,000). Studies on alternatives to forest-based fallows have been conducted in PNG since 1954. So far, no	The need for this study and the role of NARI has been described (see p.

⁴ Numbers highlighted in TAP comments refer to page #(s) of latest draft R-PP.

⁵ Several comments shown here in the TAP review referred to sub-component 2a and have been moved to that matrix

TAP comment ⁴	Summary of action(s) taken
<p>alternative has yet been found. Intensifying land use in the lowlands is possible but comes at a cost-increasing labor inputs per unit output of food. There is very little likelihood that NARI could come up with a realistic alternative proposal.</p>	
<p>33. p61: The proposed mitigation action to reduce DFD by agricultural outreach is bordering on the absurd. There is currently no effective agricultural outreach in PNG, aside from a couple of consulting teams employed by mining companies. There is very little effective agricultural research, aside from some ACIAR funded projects. And furthermore there is no clear demonstration of how outreach, if effectively applied would reduce deforestation.</p>	<p>A narrative has been provided under 2b.3 to explain the rationale behind the sustainable livelihood study and its intended outcome informing future REDD+ improvement in policy process on how agriculture can be effectively addressed.</p> <p>Currently, it's subsistence agriculture that is extensive in PNG, and unless we provide alternative options to subsistence farmers how best they can manage and use their land for agricultural purposes, within the context of attempting to reduce emissions.</p>

Sub-component 2c: REDD-plus implementation framework (Partially Met)

TAP comment ⁶	Summary of action(s) taken
<i>Comments Noted in First TAP Review that are yet to be addressed</i>	
<p>34. Section (b) European Union on page (63) may be misleading. European Union funding of Remote Sensing Centre at UPNG is for national interest in GIS training purposes while Forest Law Enforcement, Governance and Trade (FLEGT) is an ITTO funded project under PNGFA and has nothing to do with EU and UPNG. This item should be deleted from the document. (66)</p>	<p>Reference to FLEGT project has been removed from this section.</p>
<p>35. The two proposed Activities seem to be far from sufficient to provide for the “Development of a National REDD+ Framework”. Unless the activity noted below is being done through UN-REDD program, please include an Activity to prepare a national REDD+ Framework including addressing: scale, jurisdictions, locations, and agents. Show the relationship of these approaches to national action on climate adaptation and low carbon growth. (70)</p>	<p>See revised Table 2c</p>
<p>36. Table 5 shows the way REDD+ relates to sectoral/regional demonstration activities in PNG. To what extent do these proposed activities address the 2030 goals described in Figures 8 and 9? This is important in order to ensure that PNG gets to learn the opportunities and potential for implementing each of the items, e.g., is halting deforestation from agricultural leases, secondary forest management or fire management listed in 2b covered in 2c? (60)</p>	<p>We agree regarding the importance of ensuring that demonstration activities are developed in each of the areas where REDD+ benefits are being sought (as described in Section 2b). Table 5 highlights this correspondence in the case of forestry sector demonstrations (note sub-section header), highlighting pilot activities under preparation related to: (i) RIL, (ii) secondary forest management, (iii) afforestation and reforestation and (iv) forest conservation. Pilot demonstration activities related to agriculture are described in the subsequent section (2c.4.b) and include integrated land use planning approaches. We hope to incorporate additional pilot demonstration activities in areas such as fire management.</p>
<p>37. Adjust activities to support concrete actions to address identified drivers.</p>	<p>Table 2c.5 has been adjusted to reflect a more comprehensive picture of requirements</p>

⁶ Numbers highlighted in TAP comments refer to page #(s) of latest draft R-PP.

TAP comment ⁶	Summary of action(s) taken
These might include the preparation of sectoral REDD+ activities under voluntary or compliance markets to secure payments in response to emission reductions from actions taken as a consequence of these reviews.	associated with development of a REDD+ implementation framework, including sectoral demonstrations in agriculture and forestry described in section 2c.4. FCPF funds are not requested for these activities.
38. Table 9 (2c?) needs to include a column of institutions responsible for the sub-activities.	The coordinating agency for each sub-activity is identified in parentheses for each sub-activity. No decisions have yet been taken on actual implementation roles. The Implementation role of stakeholders in PNG including work plans will be elaborated during the Validation Workshop which is intended to be conducted for stakeholders if and when the R-PP is formally approved
Details	
<i>Sub-national capacity building for REDD+ readiness</i>	
39. 'One of the main objectives..climate change (p 54) – the sentence is not clear.	See revised text (p. 59)
40. 'Pilot and demonstration activities complementing REDD+ readiness activities will be carried out with the full and effective participation of landowners and local level government (56-57) – how would all landowners be consulted? Some reference to FPIC may be needed, in particular due to the very complex land tenure system in PNG.	See added text on p. 65. PNG has already prepared draft FPIC Guidelines. Relevant consultations will be undertaken in accordance with these guidelines and evolving UNFCCC guidance.
<i>Strategy and policy development</i>	
41. This section makes more sense in the component before, where harmonization between climate change policies and national and sub-national plans is detailed.	We agree and have incorporated this text into sub-section 2b.2
42. 'it is foreseen that two REDD+ related projects are launched in 2011' – information is outdated.	Wording has been revised (70)
43. ITTO Project Proposal National Training Program to Promote the Adoption of Reduced Impact Logging (RIL) in Papua New Guinea' (63) There is no indication of a timeframe for this programme: when was it submitted? What is the status? Forest Research Institute (FRI) and University of PNG (UPNG) – Remote Sensing Centre (p 64)	This refers to a project proposal submitted to ITTO last year, but which is still pending approval. See page 69
Additional Comments:	
44. There is a need for creating a position or desk within TWG to be fully funded by OCCD or under REDD+ to deal only with this major initiative. The proposal for joint training and awareness activities between member TWG at local level with sub-national officials is highly recommended. This will help OCCD as most PNG Government Departments has great policies but lack resources to conduct their programs. This is especially urgent priority for sub-national level activities. The 5 proposed REDD+ pilot project areas will benefit from this support to participate at all basic infrastructures since it is currently poor or non-existent.	The current REDD+ Technical Officers within the OCCD currently performs this duty. A small narrative has been provided to explain this

TAP comment ⁶	Summary of action(s) taken
<p>45. On models for funds distribution and benefit sharing, there are locally grown models or a model for PES which OCCD is yet to acknowledge. A group of PNG National Experts Consultative Group (ECG) on PES has worked for last 4 years to produce a model for PNG. The ECG has presented the model at 4 regional and various other OCCD and national conferences and workshops, which is currently being tested with success in East New Britain Province. You may want to consider Usefulness and applicability of this model since it may displace the need to “develop” a new model when this has been already done by PNG experts in field of law, forestry, conservation, community development, environment, local level government and business.</p>	<p>The R-PP does not propose to start from scratch and will certainly take account of, and build on, all relevant work done to date. In this case, the structure or figure included in the document shows the National Climate Change Funding mechanism, which is intended to be established, from which funding disbursement models like the proposed PES model can draw funds. We can provide more insight and explanation during the formal presentation.</p>

Component 3: Develop a National Forest Reference Emission Level and/or a Forest Reference Level (Largely Met)

TAP comment ⁷	Summary of action(s) taken
<i>Comments Noted in First TAP Review that are yet to be addressed</i>	
<p>46. Section 2c describes goals that will be achieved by 2030 and 2050 in Figures 8 and 9 (59). How do these match with the proposed shares of each activity in this Component 3? A brief explanation on this would be useful.</p>	<p>By definition, work under Component 3 aimed at developing the REL will carefully examine all major emitting sectors, including target emissions reduction areas for 2030 and 2050.</p>
<p>47. Component should add activities to synthesize data and produce a national RL/REL and demonstrate linkages to design a full carbon monitoring system.</p>	<p>No need because if we do that within this R-PP, we will be prejudging the activities currently being implemented and taken care of by the UNREDD Program. Instead, we will allow the UNREDD Program to complete what the relevant activity</p>

Sub-component 4a: National Forest Monitoring System (Partially Met)

TAP comment	Summary of action(s) taken
<i>Comments Noted in First TAP Review that are yet to be addressed</i>	
<p>48. Accountabilities for the steps in preparing the national MRV system are clear. However no budget is included for activities that should be added.</p>	<p>A combined budget for sub-components 4a and 4b is presented following the description of sub-component 4b (see pp. 99-100). Also, no FCPF funding is requested for these sub-components</p>

⁷ Numbers highlighted in TAP comments refer to page #(s) of latest draft R-PP.

Sub-component 4b: Designing an Information System for Multiple Benefits, Other Impacts, Governance, and Safeguards

TAP comment	Summary of action(s) taken
<i>Comments Noted in First TAP Review that are yet to be addressed</i>	
<p>49. The Revised R-PP with expanded version tried to address the issues raised by the First TAP Review. However, these expanded versions only concentrated on the information systems without elaborating much on the multiple benefits, impacts, governance and safeguards. There were also no discussion on the specific institutions and their capacity building needs</p>	<p>We have started developing a system for Safeguard information consistent with the modalities under the UNFCCC SBSTA agreements, which is mainly described under sub-component 4a. . We will further explain during the formal presentation on how the various policy concerns raised can be addressed through the role of this system during the formal presentation</p>
<p>50. The Revised R-PP still does not address the comments raised by the Second TAP Review. The activities and sub-activities are very technical in nature and as such institutions responsible should be identified and shown in the Table 4a&b</p>	