



ANNEX 4: CAMEROON REDD+ COUNTRY BRIEFING NOTE

This briefing is based on a systematic and comparative review of the Emissions Reduction Program (ERP) Idea Note (ER-PIN) prepared by the Government of Cameroon and submitted to the FCPF CF, other REDD+ readiness documents, and recent analysis by civil society and research institutions. It focuses on three key issues: tackling the drivers of deforestation, progress on governance reforms needed to make REDD+ effective, and the ability of the country to produce credible emission reductions (ERs) with environmental integrity. It is one of several country briefing notes prepared as the basis of an EIA report on the FCPF Carbon Fund.

SUMMARY OF REDD+ READINESS STATUS AND THE PROPOSED ER-PROGRAM

Cameroon's Readiness Preparation Proposal (R-PP) was approved in 2013.¹⁴⁸ In September of 2015 the country submitted an ER-PIN to the CF, which was rejected by the CF Participants, but it re-submitted a revised document in May 2016.

Readiness progress has been slow in Cameroon, with significant delays in much of the planned work. For example, the key set of activities to integrate social and environmental considerations into the national REDD+ strategy, the strategic environmental and social assessment (SESA), was planned for the second half of 2014.¹⁴⁹ This was to have included spatial mapping of forests and forest dependent communities and analysis of issues around access and use-rights to forests, among others, to form the basis of national consultations

on options and priorities for the national REDD strategy. As of the time of the ER-PIN submission, this work had yet to begin. An in-depth analysis of the drivers of deforestation and forest degradation and a study on the strategic options for REDD+ were to have been finalized by early 2015, but neither of those studies had been completed at the time of ER-PIN submission.¹⁵⁰

Cameroon, in fact, failed to submit any readiness progress reports to the FCPF during 2014. As early as mid-2014, just seven months after grant effectiveness, the World Bank staff supervising the R-PP project noted that civil servants in the REDD+ Technical Secretariat were losing motivation and the leadership by the Ministry of Environment, Nature Protection and Sustainable Development was evaporating.¹⁵¹ In Cameroon's August 2015 progress report to the FCPF, the Government noted that only 17% of the readiness grant had been disbursed.¹⁵² The ER-PIN asserts that a draft national REDD+ strategy would be ready by September 2015, the mid-term progress report by September 2016 and the readiness package submitted by May of 2017.¹⁵³ The national REDD+ strategy has not been made publically available as of the date of this analysis, and there has been no stakeholder outreach on the mid-term progress report to date.

The ER-PIN, prepared during the second half of 2015, was submitted in the context of little readiness progress, and without a national REDD+ strategy, which undermined the ability to make a strong case that Cameroon would soon be ready for REDD+ performance based payments.

The ER-PIN is proposed for a large area of 93,328 km² in southern Cameroon, covering seven administrative divisions: Dja et Lobo, Ocean, Vallée du Ntem, Nyong et So'o, Nyong et Mfoumou and Haut Nyong. Some 89% of the ERP area is forest, about 9.2 million hectares (ha), which includes a number of important protected areas, 1.3 million ha of council forest and more than 500,000 hectares of community forest. Approximately one third of the proposed area has been ceded to logging concessions, and more than one half of the area is covered by mining concessions, although few of these mining concessions are active yet. The ER program area borders Equatorial Guinea, Gabon and the Republic of Congo to the south.¹⁵⁴

The proposed program takes a relatively broad and comprehensive approach to reducing emissions, identifying a series of crosscutting initiatives and a series of sector based initiatives for the forest, agriculture, mining and infrastructure sectors.

The cross cutting initiatives include: information and education efforts around climate change and REDD+; land use planning and implementation, scientific research and education, biodiversity conservation and law enforcement.

Regarding sector interventions, the ER-PIN states: "The majority of the sector interventions proposed have been tried and tested for their effectiveness in the numerous project and research activities that have been initiated within the ER Program area (such as the Ngoyla-Mintom REDD+ project, the SNV/IITA REDD+ Cocoa project, IITA's USDA Fruit for Progress

and Humid Tropics projects, WWF protected areas in Campo Ma'an, UCLA research station in Dja, IUCN's conservation and natural resources management project in the Dja reserve).¹⁵⁵

For the agriculture sector the ER-PIN proposes intensification, improved cocoa production, and improved agro-forestry, despite the concern raised by stakeholders (and noted in the ER-PIN) that "intensification of agriculture might be detrimental to small-scale subsistence farmers". For the forest sector this means zoning, protection, and monitoring; reduced impact logging; increasing forest cover in fallows and support for the production and marketing of non-timber forest products such as mushrooms and forest honey.¹⁵⁶ With respect to the infrastructure sector the ER-PIN proposes the "application/utilization of low-carbon impact methods and techniques" and "support compensation programs like reforestation, afforestation and restoration of degraded vegetation."¹⁵⁷

COUNTRY CONTEXT

Cameroon intends to become an emerging economy by 2035, articulated in the Vision 2035 and the Growth and Employment Strategy Document. The development strategy embodied in the vision is heavily reliant on the expansion of mining and agro-industrial plantations, which are two of the main drivers of deforestation identified in the ER-PIN. A series of large scale infrastructure investments, including the Menve'ele hydroelectric dam, a major port project and a gas generation plant in Kribi, a rail line to connect the mining areas to the coast and extensions of the highway transport and electric transmission lines are all underway, with likely high impact on deforestation. Most of these large-scale projects will take place in the proposed ER program area. This raises the question of whether there is indeed political will to undertake REDD+, and whether that political will starts and ends with the Environment Ministry or extends to more powerful sector ministries including the prime ministry and the presidency, or is rather just an effort to capture international REDD+ finance while continuing the business as usual.¹⁵⁸

The ER-PIN lists five barriers to addressing the drivers of deforestation, these include: lack of information on climate change and REDD+,

lack of land use planning and governmental sectoral development plans, lack of inter-sectoral coordination among government agencies, lack of research dissemination for improved agricultural productivity, and poor compliance and weak law enforcement.¹⁵⁹ In the short description of land use planning challenges, weak tenure security and problems of women and indigenous peoples to access land under customary systems are mentioned. Weak governance and underfunded law enforcement are mentioned in relation to poor compliance with forestry and mining laws. What the government proposes to do about these constraints will be addressed in the following sections.

ADDRESSING THE DRIVERS OF DEFORESTATION

The ER-PIN presents a literature-based review of drivers of deforestation in the ERP area which is neither spatially explicit nor supported by quantitative evidence. No mapping of drivers or quantification of deforestation and degradation impacts is provided in the document.¹⁶⁰ However, The ERPIN does provide an assessment of historical deforestation for the seven departments of the ERP with the Dja-et-Lobo and Vallee du Ntem departments having the highest deforestation rates respectively during the periods 1990-2000 and 2000-2010. In protected areas (1.35m ha), the ER-PIN reports that there is little documented deforestation, a conclusion disputed by some stakeholders on the ground, but rather impacts on biodiversity due to poaching of bush meat stemming from poor law enforcement. While the ER-PIN does not mention, reports indicate a sharp upturn in bush meat poaching around agro-industry and infrastructure projects that draw in migration for jobs. In the buffer zones around protected areas (about 2 million ha) the main driver of deforestation and degradation is reported to be small-scale swidden agriculture stemming from poverty, lack of land use planning and tenure insecurity. In forest concessions (3.15 million ha) there is planned degradation by timber companies and unplanned degradation from illegal logging stemming from poor law enforcement and few incentives for more sustainable practices. In the non-permanent forest domain in the ER program area (about 750,000 ha) there is planned deforestation

from mining, infrastructure and agro-industry and unplanned deforestation from small scale commercial and subsistence agriculture.

National stakeholders have raised concerns (reported on in the ER-PIN) that reduced impact logging (RIL), one of the main strategies produced to reduce degradation around forest concessions, by forest concessionaires may entail increased costs that consumers are unwilling to bear, leading to low or no compliance with environmental rules. It is also unclear from the ER-PIN whether small-scale loggers would have any incentive, resources or capacity to practice RIL.¹⁶¹

Given the context and the focus in the ER-PIN on mitigating the negative impact of infrastructure projects on forests, Cameroon's performance in previous projects with similar aims are highly relevant. The World Bank in fact approved a \$20 million project entitled the Environmental And Social Capacity Building For The Energy Sector, which had this very objective. The project began in 2008 and was canceled in 2012 because little progress had been made. The Implementation Completion Report (ICR) stated: "the activities carried out by the project did not reach a sufficient level of implementation to have measurable impact on reducing the negative externalities of large infrastructure projects" and "little tangible progress was made in rendering the regulatory frameworks operational."¹⁶²

Equally instructive are the outcomes of the World Bank funded Forest and Environmental Development Program, which was directly aimed at the sustainable management of forests in Cameroon in line with the country's forest and environment sector program after the 2004 policy reforms. After a six and half year delay between concept note and start up, the operation was cancelled after five years when the government failed to meet the requirements for disbursement of the second tranche. These requirements included a review of existing forest management areas, enforcement of sustainable management provisions and cancelation of concessions in non-compliance. The WB Independent Evaluation Group review of the final project report notes: "Achievement of this trigger was the most important element of the DPO [Development Policy Operation] with respect to long-term sustainability of the forest

sector. Without it, the long-term management of forests remains uncertain.”¹⁶³

Ongolo and Karsenty, analyzing the extent to which international aid conditionality has influenced forest sector reform in Cameroon, document a similar pattern of failures with respect to earlier rounds of forest sector reform and allocation of forest concessions and conclude: “Our research shows that the government of Cameroon actually disregards the forestland use reforms recommended by international aid donors. Consequently, there is less of a political commitment that would facilitate the success of these reforms.”¹⁶⁴ This is a result of both the desire of political elites to protect their discretionary power, for example in granting land concessions and logging permits, and the benefits accrued therein, and a policy shift towards mining and agro-industry and away from REDD+ and conservation.

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One of the key strategies necessary for success of reforms that aim to reduce deforestation and degradation by tackling drivers outside of the forest sector is enhanced cooperation between ministries and governmental agencies. The World Bank report on the Forest and Environment Development Program states that “the level of inter-ministerial cooperation was poor, especially between the environment and forest ministries, which became separate

agencies during preparation. Weak cooperation between the forest and planning ministries also stalled progress on some activities. Regional planning committees established under the operation did not meet regularly or monitor program implementation effectively.”¹⁶⁵

A more recent analysis concludes similarly: “The performance of the Ministry of Environment in charge of leading the process has shown weak influence and has failed to gain the buy-in of other state agencies, including the ministries of forestry, agriculture, mining, land tenure, and economic planning, whose responsibilities are relevant to REDD+”¹⁶⁶

This has profound negative implications for the viability of an ER program that is predicated on inter-sectoral collaboration, from the national down to the commune level, and for the success of the REDD+ program in general.

PRODUCING ENVIRONMENTALLY SOUND EMISSION REDUCTIONS

At the time of the ER-PIN submission, Cameroon had not as yet produced a national reference level nor a jurisdictional one for the ERP area. Instead, the government produced a preliminary analysis to generate a basic idea of the quantity of ERs that could be produced through a CF supported program. Emissions from deforestation were generated from multiplying activity data from REDDAF and OSFT land cover change maps as with biomass data derived from a combination of five pantropical spatially explicit carbon maps. Emissions from degradation on the other hand (which were not included in the previous version of the ERPIN) were derived from computing logging production estimates from the forest concessions (mainly Forest Management Units) located within the ERP area and the same pantropical carbon estimates used for deforestation. The analysis of historical trends is for the period 2000-2010, although the ERP is not projected to start until 2018.

The ER-PIN positions Cameroon to qualify for the high forest low deforestation (HFLD) designation (at least 50% forest cover, deforestation rate below .22%/year), which allows for an upward adjustment to the reference level under FCPF rules. While, this designation sounds plausible for the ERP area with 89% forest cover and observed

deforestation at .11%/year, the justification for adjustment for the country seems problematic since forests cover 70% of the national territory but the deforestation rate is currently be around 1% which is far beyond the maximum .22% to qualify for HFLD. This raises concerns about whether Cameroon really falls within the HFLD definition.

The ER-PIN expects that the jurisdiction will experience higher rates of deforestation in the future due to pressure from international investments in mining, agro-industrial development, and population dynamics. As evidence it refers to the Government’s Plan Cameroon Vision 2035, which seeks to aggressively expand mining and agro-industrial plantations. While making adjustments for future policies is allowable under both the UNFCCC and FCPF CF rules, it creates some additional risks, namely that an inflated reference level allows a country to continue business as usual deforestation and still receive payments for REDD+. The baseline for benchmarking performance is less transparent, objective and justifiable, a potential issue in the international rules both under the FCPF and the UNFCCC. Basing a reference level adjustment on policy decisions, as opposed to an observed trend in historical deforestation is problematic, as it is difficult to forecast the impacts of future policy decisions.

It also increases the possibility that the country will produce “hot air”—ERs which are not based on actual verifiable decreases in carbon emissions, and thus have no environmental credibility. This is especially important if, as with the FCPF CF, ERs are being produced as potentially tradable assets, including as carbon offsets for emissions in another country, should an international emission trading scheme eventually be established under the UNFCCC, as now seems likely since the 2015 Paris Agreement.

The government established the forest definition as consisting of any area with a minimum of one half a hectare with over 10% forest crown cover and a 3m minimum height, which is within UNFCCC recommendations but at the very low end of what is allowable, likely overestimating the amount of forest cover in the country.

The emission factors presented in the ER-PIN are derived from five global and pantropical

studies which are acknowledged to have high uncertainty even though they are existing studies that have estimated biomass in places located within the ERP area. Those studies, such as Zapfack (2013) were used by the Republic of Congo for their ERP in Northern Congo which share similar forest ecosystems with the South-Eastern Cameroon. The average carbon estimates from pantropical studies were applied for the entire departments irrespective of the fact that each department cannot be entirely forested. Also the ERPIN itself recognizes serious limitations when using emission factors from these studies. The ERPIN states that they “represent the biomass stock at some point in the period 2000 to 2010 but are not fully consistent with the 2000-2010 reference period or the 2018-2028 project period”. Moreover estimates from these studies “show large differences in terms of carbon stock in the ER program area”. The REL from historic deforestation for the ERP is estimated to be 75,423, 336 million tons over a 10 years (2000-2010) period. This represent 7.54 million tons per year of carbon emissions from historic deforestation. The difference with the annual 6.8 millions per year provided in the previous version of the ERPIN can be explained since degradation was not included in the previous calculations. Future emissions generated through the partial equilibrium economic model, GLOBIOM for the period 2018-2028 is nearly three times historical emissions over the period 2000-2010. It seems obvious that GLOBIOM model has too much overestimated future deforestation rates and subsequent emissions. The ERPIN itself recognizes that the model has overestimated deforestation by 32% for the period 2000-2010. The results from this overestimation were divided by 1.32 to match the reality, but no detailed evidence is provided in the document to demonstrate that.

The adjustment of the REL which is .015%, thus above the 0.1% cap required by the MF, poses an additional problem.

The ER-PIN notes several potential sources of leakage or displacement from the program, these include: forest fires, agriculture, and illegal logging, as well as “rampant” timber smuggling across Cameroon’s international borders. A system for assessing, estimating, prioritizing and monitoring displacement risk is yet to be developed.

Measures to address these risks include: community based fire monitoring and control, “rethinking forest policy with a particular focus on redressing the rights of access and secure tenure” to address illegal logging; scaling up agricultural intensification across the country; and strengthen the rule of law, including through community based law enforcement.¹⁶⁷ With respect to the international, cross-border leakage, better cross border management is proposed, building on the current efforts around the Tri-National de la Sangha and Tri-National Dja-Odzala-Minkebe landscapes.

The ER-PIN identifies two possible sources of reversal risk, these are: catastrophic fire and illegal logging and unsustainable harvesting. It discounts the first risk as unlikely because fires are uncommon due to moisture levels and forest type. The latter risk can be dealt with through a variety of measures including improved forest law enforcement, strong local ownership of forestry management and the woodlot and silvi-cultural interventions that will increase carbon stocks. It states that illegal logging and unsustainable harvesting could also result from a failure of the program to generate sufficient employment or the inability to market forest products at a reasonable price, but only suggests that development of the program in consultation with stakeholders will reduce this risk. A study is planned to assess permanence risk and propose reversal management measures.¹⁶⁸

At the time of ER-PIN submission, work on a national REDD+ registry had not yet begun, but consultations with experts had been carried out and a registry with a long list of functions, including the avoidance of double counting, is planned using open source technology to create a web based platform.¹⁶⁹

ADVANCING GOVERNANCE REFORMS

The Cameroon ER-PIN provides a general overview of the tenure situation in the ERP area: approximately 63% is in the permanent forest domain (and thus owned by the state), of which 15% are Council Forest, 15% are protected areas and 34% are logging concessions. About 8% is in the non-permanent forest domain including about 5% of the area which are community forests (a little over 500,000 ha). Mining exploration permits cover more than half

this area, overlapping with both designations.¹⁷⁰ A land use map, drawn from the WRI Forest Atlas, shows the significant overlap of land use designations. There is mention of indigenous peoples present in the area, including Bakola, Bagyeli and Baka peoples, but no population figures, nor identification of communities or camps in the ERP area.¹⁷¹

The land tenure description in the ER-PIN is weak, providing only a very high level summary of the situation, with no spatially explicit discussion of the number of communities, community forests, council forests, etc. in the ER program area. This is despite extensive work on mapping tenure arrangements carried out in recent years by a number of international organizations, including the World Wide Fund for Nature (WWF) the Rainforest Foundation UK, and the Forest Peoples Programme (FPP) and the Centre for Environment and Development (CED). While noting that most small holders lack secure rights to land, the ER-PIN suggests that issues relating the role of large agricultural enterprises and access issues for indigenous people’s and women will be explored by the strategic environmental and social assessment (SESA). It does not mention overlapping conflicts between mining concessions, protected areas, infrastructure development, or logging concessions. The ER-PIN states, “The government of Cameroon supports implementation of a more modernized system of property rights (i.e., with surveys of GPS coordinates supporting registration processes), but the implementation of this policy is slow.”¹⁷²

The ER-PIN goes on to state that it is “not expected that any significant change in the national land law will be passed through this ER program” but that “[t]he program will improve and strengthen the traditional ownership and management of forests through participatory land use mapping, but will also encourage the use of modern land use systems to ensure transfer of land ownership from state to communities for the implementation of the ER-Program activities such as intensive agriculture and re/afforestation by households.” The ER-PIN suggests that this can be done through state purchase of land for communities, through temporary land leases, or through establishment of community forests, although noting that current practice for community forests is also based on fixed period leases.¹⁷³

In the section on cross cutting initiatives that would be part of the ER program, the ER-PIN commits to participatory cartography and zoning in “priority zones” to define areas for limiting deforestation and degradation, adding that “This action has the additional benefit of clarifying use and tenure rights over forests and forest resources and is an initial step towards recognition of these rights by the National and Regional administrations.”¹⁷⁴ Priority zones and specific measures are not defined, nor how those initial steps would actually be followed up on, by whom, and at what cost.

In a 2013 study of forest users and tenure issues in three sites in Cameroon, Ngendakumana and colleagues note: “Local communities may not benefit from REDD funds as they will be misdirected by those with political and economic powers. In this way, drivers of deforestation and forest degradation will be enforced, thereby jeopardizing carbon sequestration and the climate change mitigation effort. Undertaking prior forest tenure reforms is important to ensure that forest benefits under REDD+ schemes will not go only to facilitators or intermediaries and the members of legal entities.”¹⁷⁵

The ER-PIN section on land use planning describes the need to more effectively plan for the extensive road, port, energy and mining infrastructure being planned for the region, but does not describe the regulatory framework for such planning or how the inter-sectoral coordination would be accomplished. It states part of this land use planning effort would involve participatory mapping and zoning, which could enhance community land tenure security, but does not specify how tenure would be formalized on these basis of locally generated maps or plans. The very short section on law enforcement is equally vague, saying only that local authorities would be supported and the possibility of the using community rangers. The proposed financing plan provides no further information, as only a general category “implementation costs” is specified, and the only resources from the Government that are committed amount to \$200,000 during program design.

A 2012 study documented significant overlap in land use authorizations—with thirty-three

mining and oil permits granted for exploration and exploitation within sixteen different protected areas.¹⁷⁶ The study concludes that these concessions were granted without following the procedures required by law, and that the ensuing conflicts are likely to undermine both the attempts to attract international investment in line with the Vision 2035 and ongoing conservation efforts.

Because of the extensive remaining forests in Cameroon and the important advances in community forestry and pilot projects involving payments for environmental services, REDD+ could play an important role in conserving forests and improving livelihoods.

CONCLUSION

Cameroon is still not well positioned to design a program for results based payments for REDD+, and there is not yet enough progress on REDD+ readiness and high-level political engagement to allow for the realistic planning of such a program. Further efforts to study and spatially document drivers of deforestation and forest degradation, develop a national REDD+ strategy, build inter-sectoral policy coherence and undertake governance reforms around land use planning and land and forest tenure security are required to create a conducive policy framework for REDD+. At present, the risks of launching a large scale REDD+ program are significant, and there does not appear to be sufficient demonstrated political will to manage those risks adequately.

Cameroon also still has a long way to go to develop a credible reference level and system for monitoring reporting and verification, as well as systems for dealing with leakage and reversals, and for tracking credits through a registry.

Lastly, Cameroon’s national development strategy and Vision 2035 is predicated on an expansion of the drivers of deforestation, and it is not yet clear whether there is political will to make the hard choices in terms of postponing investments in mining and agro-industry until efforts to enhance environmental governance are in place. This includes substantial work needed to advance the land and forest tenure security of Cameroons forest communities and indigenous peoples. Because of the extensive remaining forests in Cameroon and the important advances in community forestry and pilot projects involving payments for environmental services, REDD+ could play an important role in conserving forests and improving livelihoods, but only if there is political will to undertake readiness activities, strengthen governance, and recognize the rights to land and forest by communities and indigenous peoples.

RECOMMENDATIONS:

As Cameroon is behind in promised readiness activities and additional readiness activities are planned through 2017, it could benefit from performance-based payments for taking specific actions to improve its readiness and its forest management including the following:

1. Cameroon needs to conduct participatory land and forest tenure and social assessments in the ER Project Area to inform time bound action plans for the legal recognition of indigenous and community customary lands. This should include the identification of community forests, the role of large agricultural enterprises and access issues for indigenous peoples and women, but also conflicts around mining concessions, protected areas, infrastructure development, and logging concessions.
2. The Government of Cameroon needs to carry out regional land use planning that builds the existing micro-zoning and multiple community participatory maps developed in the ERP area, in order to inform plans for the extensive railroad, port, energy, mining and transboundary road infrastructure being planned for the region. An inter-sectoral dialogue and coordination group could be set up in order to balance the needs and resolve conflicts between proposed ER Program and other projects being planned in the ER Program Area.
3. Prior to submitting a revised ERPIN, Cameroon should provide a thorough and comprehensive qualitative and spatially explicit identification of the drivers of deforestation and forest degradation that the ERP is trying to address.
4. The benefit-sharing agreement must be developed that implements lessons from existing benefit sharing schemes in Cameroon, such as the (largely dysfunctional) Annual Forest Royalty (AFR) to ensure that the income generated benefits communities within the ER program area. Strong safeguards will be needed to ensure that funds cannot be, as it has been the case with the AFR.
5. More detail is needed on how to increase effort and investment in strengthening forest governance, including monitoring of legal compliance and RIL requirements in forest concessions, monitoring social agreements in forest concessions, strengthening law enforcement actions around above, strengthening judicial capacity to address issues above, timber legality assurance system.
6. An investigation of the thirty-three mining and oil permits granted for exploration and exploitation within sixteen different protected areas that were found in 2012 by Schwartz, Hoyle, and Nguiffo to have been granted without following the procedures required by law needs to be undertaken. In addition, all other concessions within the ER Program Area should also be reviewed, in order to ensure they were allocated in accordance with the laws of Cameroon.
7. Prior to submitting a revised ER-PIN, the studies planned to assess, leakage, transboundary leakage, permanence risk and propose reversal management measures must be completed and the recommendations either implemented or made part of the ER Program.
8. The next ERPIN proposal needs to provide clearer approaches and strategies for risk assessment and mitigation.
9. A REL based on real deforestation rates that distinguishes between the amount of carbon in different types of forests and which is based on historic deforestation rates should be prepared and all of the underlying data released so that it can be independently verified.

WORKS CITED

- 1 The CF currently has US\$702 million in contributions from donors, but has begun planning for possible scenarios with \$800 million, see: https://www.forestcarbonpartnership.org/sites/fcp/files/2015/October/CF13%20a.%20Setting%20the%20stage%20for%20ER-PIN%20reviews_1.pdf
- 2 See IEG Evaluation of FCPF, August 2012
- 3 The CF currently has US\$702 million in contributions from donors, but has begun planning for possible scenarios with \$800 million, see: https://www.forestcarbonpartnership.org/sites/fcp/files/2015/October/CF13%20a.%20Setting%20the%20stage%20for%20ER-PIN%20reviews_1.pdf
- 4 See for example the IEG external review of the FCPF, p.xix and Kissenger 2012, p.12
- 5 See Manang, et al 2014
- 6 As evidenced by the drivers analysis and data for the REL in the ER-PINs and ER-PDs
- 7 Global Witness, *The Art of Logging Industrially in the Congo*, 2012, p.3
- 8 Lawson, S., *Illegal Logging in the Republic of Congo*, Chatham House, 2014, p.2
- 9 See IEG Review of the WB Forest Strategy Managing Forest Resources for Sustainable Development 2013
- 10 See Chatham House 2014 Reviews on Illegal Logging in DRC and RoC
- 11 In the DRC ER-PD, it is proposed that the WWC REDD project receive 15% of benefits from sales of ER credits, logging concessions receive 7% and “nested communities receive 8%, p. 181; in the Draft RoC ER-PD, logging, mining and oil palm companies are all proposed to receive payments from the sale of credits directly, while indigenous communities and local communities would not, they would receive benefits through traditional social contracts via logging companies, ER-PD, p.207-208.
- 12 See for example Miller et al., PNAS 2011, Reduced impact logging minimally alters tropical rainforest carbon and energy exchange, <http://www.pnas.org/content/108/48/19431.full>
- 13 FERN 2014, p.5
- 14 See governance sections of EIA Country Briefing Notes on DRC, RoC, Cameroon and Madagascar
- 15 See governance sections of EIA Country Briefing Notes on DRC, Cameroon and Madagascar
- 16 The CF MF rule relating to this is Criterion 13, MF p.13
- 17 The RoC draft ER-PD (P.135) for example, says: “The adjustment exceeds the 0.10% of carbon stock limit in the Methodological Framework. However, capping the limit at 0.10% is arbitrary and unilaterally limiting the establishment of Congo’s ER Program REL to this amount over historical emissions inherently sets the program up for failure.”
- 18 The “willingness to pay” announcement was not well received by REDD+ countries, see letters from DRC, Ghana, Mexico, Nepal and Costa Rica here: <https://www.forestcarbonpartnership.org/CF10>
- 19 See FAO 2015
- 20 See WWF Comments on DRC ER-PD: <https://www.forestcarbonpartnership.org/sites/fcp/files/2016/Mar/DOC%20WWF%20ERPD0001.pdf> or EIA Comments on DRC ER-PD at: <https://www.forestcarbonpartnership.org/sites/fcp/files/2016/Mar/EIA%20Comments%20DRC%20ER-PD.pdf> or FERN/FPP Briefing 2014
- 21 For a detailed discussion of this, see case EIA studies on DRC and RoC
- 22 The RoC ER-PD was drafted by Terra Global Capital; much of the accounting work for the DRC ER-PD has been done by Wildlife Works Carbon; the Cameroon ER-PIN relies on spatial analysis by the company Planet Labs, while the Madagascar ER-PIN builds on carbon accounting work developed by the Wildlife Conservation Society and Conservation International.
- 23 See Ochieng (2015), p.50
- 24 CF MF, p.13-14
- 25 See CF Buffer Reserve Guideline, p.2
- 26 See EIA Country Briefing Notes on DRC, RoC Cameroon, and Madagascar
- 27 The carbon funds at the WB have grown from about US\$160 million in 2000, to over US\$3 billion today, the Bio-CF was founded in 2004 and was the first to focus on LULUCF, see: <https://www.forestcarbonpartnership.org/sites/forestcarbonpartnership.org/files/Documents/PDF/Sep2010/Pioneering%20Carbon%20Asset%20Creation.pdf>
- 28 Dooley 2014; Watts undated
- 29 See Munden Report
- 30 See Norton Rose (2010), Pesket and Brodnig (2011), Karsenty (2012), Loft et. al. (2015), among others.
- 31 R-PP Template, pp. 33-34
- 32 Ibid, pp.50-60
- 33 See: Global Witness *The Art of Logging Industrially in the Congo* (2012), Global Witness, *Exporting Impunity, June 2015*, Greenpeace, *Artisanal Logging=Industrial Logging in Disguise* (2012); Greenpeace, *Illegal Logging in the DRC* (2013), Greenpeace Africa, *Trading in Chaos*, Johannesburg, May 2015
- 34 See for example Sam Lawson: *Illegal Logging in the Democratic Republic of Congo*, Chatham House 2014
- 35 See Food First Institute *The World Bank Group’s 2013-15 Agriculture for Action Plan: A Lesson in Privatization, Lack of Oversight and Tired Development Paradigms*
- 36 See governance sections, EIA Country Briefing Notes on DRC, RoC and Cameroon
- 37 Some recent evidence of this includes the Forest and Environmental Conservation Project in DRC, the Forest and Economic Diversification Project in RoC, and the Forest and Environmental Development Program in Cameroon, see the WB Implementation Completion Reports cited in the EIA Country Briefing Notes.
- 38 See for example the CIFOR Global Comparative Studies on REDD+: <http://www.cifor.org/gcs/>
- 39 This was particularly true for the DRC R-Package self-assessment, which scored almost all indicators with “green” indicating significant progress.
- 40 All bi-annual country reports can be found here: <https://www.forestcarbonpartnership.org/redd-countries-1>
- 41 See for example Cotula and Mayers 2009, Sunderlin 2013
- 42 TAP Review of DRC ER-PD, dated 7 February 2016, pp.40-42
- 43 CF MF, p.21
- 44 Frameworks provide rules and guidance as to the process that needs to take place when the specific locations and interventions are known, at which time the specific action plans for avoidance or mitigation of negative impacts are to be developed and implemented.
- 45 See for example Implementation of World Bank’s Indigenous Peoples Policy Learning Review (FY06-08) and Involuntary Resettlement Portfolio Review, Phase II Resettlement Implementation, June 2014
- 46 Section 10.02 of the ERPA Commercial Terms, which override the General Conditions, have a presumption of confidentiality.
- 47 The DRC is a good example of this, where separate indicators and monitoring systems are being developed under the national safeguard system and for the World Bank ESMF.
- 48 For example, FCPF readiness analytical work in Congo Basin countries has not supported SIS design. Despite inclusion of references to UNFCCC decisions in FCPF guidance documents, WB staff in the regions and country offices may have little familiarity with UN processes and reporting requirements.
- 49 This is reflected in both the systematic operational risk tool (SORT) and in the R-PP Assessment Notes prepared by the World Bank.
- 50 FCPF Carbon Fund ER-PIN selection criteria, see: <https://www.forestcarbonpartnership.org/sites/forestcarbonpartnership.org/files/Documents/PDF/June2012/FMT%20Note%20CF%202012-2%20ER-PIN%20Selection%20Criteria%20rev.pdf>
- 51 CF MF, Criterion 13, p.11
- 52 In the Draft RoC ER-PD, logging, mining and oil palm companies are all proposed to receive payments from the sale of credits directly, while indigenous communities and local communities would not, they would receive benefits through traditional social contracts via logging companies, ER-PD, p.207-208; Global Witness, *The Art of Logging Industrially in the Congo*, 2012, p.3.
- 53 FMT Note 2012-8, p. 6
- 54 The DRC Readiness Package documents are available here: <https://www.forestcarbonpartnership.org/democratic-republic-congo-r-package-reference-documents>
- 55 Letters of Intent do not commit the WB to purchase ER’s, or the producing country to sell them, they create an exclusivity period while the country is preparing their ER-PD. The Emission Reduction Purchase Agreement (ERPA) is the purchase/sale agreement for ERs.
- 56 See CIFOR (2015) for a summary of recent studies
- 57 ER-PD, p.16
- 58 The ER PD states that during the reference period (2004-2014) unplanned deforestation and degradation activities including slash and burn agriculture has caused a loss of 154,175 hectares annually whereas planned degradation activities including based on the concession data from industrial logging has impacted an area of 229,126 ha over the same period.
- 59 See for example: Global Witness *The Art of Logging Industrially in the Congo* (2012); Global Witness, *Exporting Impunity* (2015), Greenpeace, *Artisanal Logging=Industrial Logging in Disguise* (2012); Greenpeace, *Illegal Logging in the DRC* (2013), Greenpeace, *Trading in Chaos* (2015).
- 60 World Bank Implementation Completion Report on Forest and Nature Conservation Project, P.23
- 61 See CSO letter at http://loggingoff.info/sites/loggingoff.info/files/NGO%20letter%20on%20DRC%20Arrete%20050_5.10.15_final.pdf for a full discussion.
- 62 See Global Witness: *Exporting Impunity* (2015)
- 63 See Greenpeace complaint to FSC
- 64 Chatham House 2014, p.2; p.14
- 65 <http://www.africanews.com/2016/05/07/dr-congo-proposes-22-percent-budget-cut-in-2016/>
- 66 Griscom, B., et al., Carbon emissions performance of commercial logging in East Kalimantan, Indonesia, *Global Change Biology* (2014) and Martin, P.A., et al. Impacts of tropical selective logging on carbon storage and tree species richness: A meta-analysis. *Forest Ecol. Manage.* (2015)
- 67 Greenpeace 2015, p.6
- 68 ER-PD, p.61
- 69 Lawson, S., *Illegal Logging in the DRC*, Chatham House 2014, p.2; p.14
- 70 Ibid, p.57
- 71 World Bank Implementation Completion Report on Forest and Nature Conservation Project, P.23, the ICR

- also reports that a number of other objectives were not met, and indicators designed to monitor them were dropped at midterm through a restructuring, with no monitoring carried out, these include an increase in field supervision missions, preparation of monitoring reports, prosecutions of violators for illegal logging infractions, extension of illegal logging roads, areas of participatory zoning, percentages of forest users aware of their rights, number of people trained in safeguard measures, number of mitigation measures implemented, and the list goes on.
- 72 World Bank Implementation Completion Report, Forest and Nature Conservation Project, p. 23
- 73 Lawson, S. *Illegal Logging in the Democratic Republic of the Congo*, Chatham House, April 2014
- 74 *Ibid*, p.2
- 75 PwC, *Implementing REDD+ in DRC - How to manage the risk of corruption*, 2011
- 76 *Ibid*, p.20
- 77 Assombe, S. *National-level corruption risks and mitigation strategies in the implementation of REDD+ in the Democratic Republic of the Congo: An overview of the current situation*, U4 Anti Corruption Resource Centre, Issue 2015-9
- 78 BioCF Mai Ndombe Investment Plan 2015, p.36
- 79 *Ibid*, p.46
- 80 DRC National REDD+ SESA report, p. 57
- 81 ER-PD, p.35
- 82 The BIO CF Feasibility Study contains the most information of any of the documents, and is specific to the ER program area. It states that there are 1,371 villages and 1,110 farm tracks in Mai Ndombe (p.59). It however treats the issues of rights to land and forest as a question of access to property, concluding that it is only problematic on the outskirts of cities where demand for land is high. It provides an overview of the legal situation, noting state ownership, considerable informality, and itemizes nine different types of land conflicts that can ensue, although does not attempt to provide any indication of how widespread or prevalent any of these conflicts are, nor propose any means to mitigate.
- 83 While there might be a (weak) rationale for allowing the concessions that are not currently operating to get underway, the Annex 26 shows historic emissions from all but three concessions, indicating the logging is happening whether or not the required management plan is in place. The historical average annual emissions (for years of exploitation) is 1,011,701, the adjusted annual emissions is 3,148,942. Looking at the individual concession numbers, for example the largest of SODEFOR's concessions (contract #030/03), the historical emissions are noted as 84,196 while the adjusted emissions are 379,993, more than a four-fold increase.
- 84 ER-PD, p.128
- 85 See draft ER-PD, p.17; FCPF Project Paper for Additional Readiness Grant October 2015, p.6
- 86 See UNREDD 2015 Semi Annual Progress Update, p.8;
- 87 Lawson, p. 2
- 88 Draft ER-PD, p.18
- 89 Lawson, p.2-5
- 90 Draft ER-PD, p.34, note: page numbers are those on the bottom left of page, not PDF page numbers
- 91 *Ibid*, p.6
- 92 See Brandt, et. al. (2016), although Karsenty, et. al. have disputed these findings.
- 93 CIA World Fact Book, page updated June 30, 2015 available at: <https://www.cia.gov/library/publications/the-world-factbook/fields/2002.html>
- 94 ER-PD, p.38
- 95 *Ibid*, p.20
- 96 Miaro III, L, Feintrenie, L., De Wachter, P., (2014) *Compte-rendu de mission de la délégation WWF-CIRAD en République du Congo du 27 février 2014 au 11 mars 2014*
- 97 OI-APV FLEGT (2014) *apport N°01/CAGDF. Mission du 06 au 23 avril 2014*
- 98 Karsenty, A., Vogel, A., & Castell, F. (2014). "Carbon rights", REDD+ and payments for environmental services. *Environmental Science & Policy*, 35, 20-29.
- 99 Draft ER-PD, p.38
- 100 *Seeds of Destruction*, pp. 24-29
- 101 Draft ER-PD, p.40, see maps of mining permits pages 29-30
- 102 *Ibid*, pp.40-41
- 103 Draft ER-PD, pp.53-57
- 104 See, *Seeds of Destruction*, RFUK 2013, for a summary of impacts
- 105 Draft ER-PD, p. 41
- 106 See <http://infocongo.org/i-lost-the-redd-debate-in-cabinet-to-palm-oil-congolese-minister/>
- 107 Draft ER-PD, p.52
- 108 *Ibid*, p. 93
- 109 *Ibid*, p.154
- 110 *Ibid*, p.140
- 111 *Ibid*, p.166
- 112 ER-PIN, p.57
- 113 See *Plateforme Congolaise pour la Gestion durable des forêts*, letter on R-PP February 2011
- 114 See WB Restructuring Paper, Forest and Economic Diversification Project, September 22, 2015
- 115 WB ICR Transparency and Governance Project, p. 22
- 116 *Ibid*, p.25
- 117 *Ibid*, p.20
- 118 A Letter of Intent between the CF and REDD country governments is a commitment to develop a full ERP, it is not a commitment to sign an ERPA. Madagascar's Loi can be found here: <https://www.forestcarbonpartnership.org/sites/fcp/files/2015/November/Signed%20MG%20Loi.pdf>
- 119 Madagascar ER-PIN, p.12
- 120 See WB Waves Report (2012)
- 121 See for example: WB Country Environmental Analysis 2013; Aquino 2014
- 122 McConnell and Kull, 2014, p.95
- 123 WB REDD Readiness Assessment Note, p.3
- 124 See Gorenflo, et. al. 2011; McConnell and Kull 2014
- 125 See EIA 2014
- 126 See Hockley (2007); Birmont (2015); Poudyal (2016)
- 127 ER-PIN, p.49
- 128 ER-PIN, p. 49
- 129 Aquino 2014, p.10, The case of precious wood is another example of elite capture, corruption, lack of transparency and illegality, see EIA 2010 & 2014
- 130 ER-PIN, p.35
- 131 WB 2015, Analysis of CFM in Madagascar, p.11
- 132 EP3 ISR23. P.21 December 2015
- 133 Poudyal et al, 2016
- 134 Aquino 2014, p.6
- 135 WB CEA, p.30
- 136 *Ibid*, p.30
- 137 WB CEA, p. 41, CIRAD 2014, p. 5
- 138 Aquino, p.8
- 139 WCS Comments on ER-PIN, p.3
- 140 ER-PIN, p.32
- 141 EIA Briefing for CITES 2014
- 142 WCS Comments on ER-PIN
- 143 ER-PIN, p.87
- 144 See: <http://www.perr-fh-mada.net>
- 145 ER-PIN, p.41
- 146 See EIA, 2014
- 147 ER-PIN, p.56
- 148 Cameroon's Readiness Preparation Grant was approved in November 2013, see also Dkamela 2010 for a detailed account of the early readiness phase.
- 149 See SESA Work Plan, Annex V, World Bank Assessment Note for Cameroon R-PP
- 150 See Procurement Plan, Annex IV, World Bank Assessment Note for Cameroon R-PP
- 151 World Bank Grant Reporting and Monitoring Report, 6/14, p.2
- 152 *RAPPORT DE PROGRESSION ANNUEL REDD+*, P.23
- 153 ER-PIN, p.12
- 154 *Ibid*, pp. 15-16
- 155 *Ibid*, p.27, USDA is the United States Department of Agriculture, WWF is the World Wildlife Federation, SNV is the Netherlands International Cooperation Agency, IUCN is the International Union for the Conservation of Nature
- 156 *Ibid*, p.35
- 157 *Ibid*, p.30
- 158 Ongolo, S., Badoux, M., Sonwa,D., *Aux frontieres du reformisme environnemental: l'Etat et la gouvernance forestiere au Cameroun*, p.18
- 159 ER-PIN, p.23
- 160 *Ibid* pp.20-1
- 161 *Ibid*, p.35
- 162 WB IEG ICR Review of Cameroon Environment and Social Capacity Building for the Energy Sector Project, p.5
- 163 WB IEG ICR Review of Cameroon Forest and Environment Development Program, p. 3
- 164 Ongolo and Karsenty, p. 204
- 165 WB ICR Forest Environment Development Program
- 166 Dkamela, et. al 2014
- 167 *Ibid*, p.65
- 168 *Ibid*, p. 64
- 169 *Ibid*, pp.76-7
- 170 ER-PIN, p.16
- 171 *Ibid*, p.17
- 172 *Ibid*, p.70, This is based on Decree n°2005/481 of 16 December 2005 which calls for the transcription of all land titles.
- 173 *Ibid*, p.71
- 174 *Ibid*, p.26
- 175 Ngendakumana et al. p.12
- 176 Schwartz, et.al 2012