

## Community & Forest Platform (CFP)

June 15, 2016

### Position Note on the elaboration and validation process of the Emission Reduction Program Idea Note in Cameroon

Cameroon will submit a new version of its Emission Reduction Program Idea Note (ER-PIN) during the upcoming Carbon Fund meeting (CF14) which will take place in Paris, France in June 20-22, 2016. The new submission is the second after the first version was rejected at CF13 in October 2015.

After the analysis document shared with CF13 members and at the national level on the 2015 Cameroon's ER-PIN version, The Community and Forest Platform (CFP), a Platform of more than fifty national, local and community based civil society organizations working on forest and peoples' rights issues in Cameroon, made a follow up<sup>1</sup> of the responses given to the recommendations of CF13 members and those of the civil society to improve the Program Idea Note.

After months of activities, the new version of Cameroon's ER-PIN has been released. Even if we recognize that some area of improvement exists, however, some issues remain problematic and make us believe that no fundamental changes have been registered from the former version. Unfortunately, the gaps registered in the current version of the ER-PIN are as follow:

#### **I. Issues of participation and consultation in the ER-PIN development and validation process**

- ***Failure in the implementation of the National Free Prior and Informed Consent (FPIC) Guidelines***

The ER-PIN process failed to implement the FPIC Guidelines which has been elaborated and validated at the national level as the main consultation tool of local and indigenous communities for all REDD+ activities. Since no consultation process at the community level has been led, communities didn't had the opportunity to directly participate to the development of the ER-PIN, though, based on the National FPIC Guidelines principles, it is said that their consent has to be prior to any REDD+ development project/program (National FPIC Guidelines, page 8). With the current ER-PIN, it is clear that even if the consultation process is realized after the validation of ER-PIN as stated in the document (Paragraph 6.2, page 48-49), communities' consent will be biased since their consent would be limited to the fact that they have to accept activities already validated in the ER-PIN, without any possibility of rejecting the ER-Program or some its activities as it should be expected from an FPIC consultation process.

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<sup>1</sup> CFP formally sent a letter to the Minister in charge of Environment, Nature protection and sustainable Development requesting for an audience before the new submission of the document. Unfortunately we did not have the opportunity to meet him in order to clarify our fears toward the ER-PIN document.

- ***Limitations in the implication and participation of the Civil Society organisations (CSOs)***

The development of Cameroon's current ER-PIN document failed to ensure the full and deep participation of CSOs. Even if the National REDD+ Platform endorses the current version of the ER-PIN, and that sensitization workshops and consultation campaigns have been organized in the covered by the ER-Program and a validation workshop organized at the national level as stated in the document (page 44-45), the document presented has been shared among CSOs for comments just for a period of one week. Most of organisations criticized the initiative of asking only for constructive comments within a one week time frame as a way for the Government to negatively influence the participation of all the stakeholders. In fact, the Government took eight months to improve the document but just gave one week for comments from CSOs on a technical document of more than a hundred pages and only written in English when a lot of CSOs do not always have high level of English proficiency staff to fully understand it. How then can CSOs have a fundamental contribution? How can such a document be validated without a certain level of participation? Why didn't the Government take time to consult and ensure the participation of the CSOs and build a robust ER-PIN for a resubmission at the CF15 instead of CF14?

## **II. An ER-PIN without robust basis?**

- ***No study of the drivers of deforestation and forest degradation at the national level***

As far as the analysis of the drivers of deforestation are concerned, Cameroon is still finalizing that study. On this basis, we find it really hard to imagine that emissions can be reduced, effective measures of mitigation identified and the ER-PIN be efficient when the drivers are not yet identified based on rigorous results of a robust study. Although it is stated in the current ER-PIN document that an in-depth analysis of the drivers of deforestation and forest degradation was carried out in the ER-Program area as prelude to the national study that has been contracted, no numeric data presents the scale and importance of each of the drivers. And the measures proposed seems not to be different from all what is been done currently. So what will be the added value of the ER-Program, and thus what will be the guarantee of its success? At last, we wonder how solutions will be found to all the proposed interventions within the ER-Program since they have always been considered as issues for the entire government for years now: is it realistic?

- ***No fundamental changes in the readiness process: proof a low REDD+ political commitment?***

Talking about the Readiness process, we will recognize that a National Strategy Draft has been shared among stakeholders for comments. However, what we notice is that, most of the studies which had to sustain a REDD+ national strategy are still ongoing (drivers of deforestation, consultation Plan) or are still at their early stages (Benefit sharing mechanism). Some of those studies have been finalized but their implementation are still questionable (Communication Plan, National FPIC Guidelines). And the period for the end of development of the national strategy is always delayed, primarily at the end of 2016, and now, in the ER-PIN document we can notice that the final reference scenario activities are planned for 2017 and those related to MRV for February 2018 (page 15). Can we talk in this case of a Draft National Strategy Plan since the document shared refers to very partial or nonexistent results and is not based on fundamental scientific studies?

This is understood as a lack of political commitment because, even if Cameroon is actively engaged in the implementation of some international conventions protecting environment as stated in the document (page 10), and has also engaged the ratification of the Paris Agreement on Climate Change, the country has also engaged highly deforestation and forest degradation activities in the

area by the ER-PIN since these activities are considered as helpful to achieve the Cameroon's 2035 Vision of an emergent country and are checked off the Growth and Employment Strategic in which a clear priority is given to mining and agribusiness development. The inter-sectorial coordination is still problematic since the master plan and the Land use plans are still awaited, are developed independently and thus, are not necessarily in coherence with the REDD+ process. The cases of overlapping of titles are still a reality in the area covered by the ER-Program<sup>2</sup>. The working group which it is referred to in the current ER-PIN document (page 8-10) is more a technical group than a political one. Thus the political commitment is still questionable.

### III. Inexistence of a Benefit sharing mechanism

The benefit sharing mechanism has not yet been developed. It is considered as an upcoming activity and is planned for April 2017 latest (Table 2, page 14). The existing benefit sharing mechanisms have shown their limits. However, what will be the incentive for affected communities? How then will communities benefit from the ER-Program apart from the non-carbon benefit? If such a point is not clear, it might increase the risks of the ER-Program and be source of leakages.

Cameroon's 2035 Vision of an emergent country and are checked off the Growth and Employment Strategic Document with clear priority given to mining and agribusiness development. Thus the political commitment is still questionable.

Based on all these elements and in the light of the points above mentioned, CFP recommends the following:

- We strongly believe that, at this stage, Cameroon ER-PIN is still not enough developed and will not help to resolve deforestation and forest degradation issues and thus reduce Green House Gas and protect indigenous and local communities in the area covered by the ER-Program;
- Since no changes have been observed in current version, all the recommendations made in the previous version of Cameroon's ER-PIN remain relevant here;
- The National FPIC Guidelines have to be implemented prior to any successful submission of Cameroon's ER-PIN in order to acquire the legitimacy from communities in the area covered by the ER-Program;
- Participation of CSOs to the process should become a full reality and not just limited in the frame of validation of documents;
- The Government should finalize all the studies and develop a proper draft version of the National Strategy prior to the ER-Program so that the Program could be used as a test framework for the options proposed in the National Strategy.

*For the Community and Forest Platform (CFP)<sup>3</sup>*

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<sup>2</sup> Schwartz, B., Hoyle, D., and Nguiffo, S (2012) Emerging trends in land-use conflicts in Cameroon: Overlapping natural resource permits threaten protected areas and foreign direct investment (2012) RELUFA, WWF and CED. Yaoundé, Cameroon

<sup>3</sup> The Community & Forest Platform (CFP), is a platform of Civil Society Organizations (CSOs) in Cameroon active in forestry and related fields, and representative of the regions of dense rainforests of Cameroon. Previously called European Community Forest Platform (ECFP) because it was established in July 2002 in order to ensure

*The signatory members of the current Position Note:*

AAFE BEN, ABAWOMI, ADEBAKA, AFDECDH, AJDUR, AJESH, APED, APRIAATE, ASBAK, ASTRADHE, BACUDA, CADDAP, CADER, CAFT, CAFER, CAJAD, CARFARD, CED, CeDLA, CEFAID, CEREP, CENDEP, CERUT, CIEFE, COMINSUD, CRADIF, EEATH CAMEROON, FAJOID, FCTV, FODER, GDA, Nature Cameroon, ONED, PAPEL Cameroun, PERAD, ROCAME, ROLD, RUDEC, SAILD, SEFE.

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that aid from the European Commission should have a positive impact on forests and their populations, the new name, Community & Forest platform (CFP), was adopted at the plenary meeting in August 2014, to further reflect the dynamic of response of the platform and its affiliation. E-mail : [plateformecfp@gmail.com](mailto:plateformecfp@gmail.com) ; Blog CFP: <https://plateformecfp.wordpress.com>