

Independent TAP Review of the R-Package prepared by Uganda
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INTRODUCTION: THE CORE TASK OF THE TAP REVIEW

This document provides a review of the R-Package Self-Assessment Report prepared by Uganda, through a participatory self-assessment process, between the months of May and July 2018, facilitated by its REDD+ Secretariat in conjunction with an External Assessment Expert. It involved 108 REDD+ Stakeholders, which included government ministries, agencies and departments, as well as Civil Society Organizations (CSO)/Non-Government Organizations (NGOs), Private Sector. In addition all the three, REDD+ Taskforces, National Technical Planning Committee (NTC), National Climate Change Advisory Committee (NCCAC) and REDD+ donors, also participated.

1. The process of preparing the R-Package is quite useful to any set of national stakeholders because it offers a unique forum for any country's REDD+ participants to self-assess the progress on REDD+, demonstrates their commitment to REDD+ Readiness; and generates feedback and further guidance. As in Uganda and other participating countries, it is important to recognize key milestones in the context of REDD+ Readiness. In that context Uganda prepared a National REDD+ Strategy in October 2017 and produced draft documents on, a Strategic Environmental and Social Assessment (SESA), Benefit Sharing and Access and on Feedback and Grievance Redress Mechanism (FGRM), all of which it wants to test going forward.
2. The purpose of the review is primarily to assess both progress and achievements of REDD+ Readiness in the country using a Readiness Assessment Framework (<http://www.forestcarbonpartnership.org/sites/fcp/files/2013/July2013/FCPC%20frame>

work%20text%207-25-13%20ENG%20web.pdf), which consists of a set of 34 readiness criteria, distributed under four main readiness components, and their respective sub-components.

TAP ASSESSMENT FRAMEWORK

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

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

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

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

Self-Assessment process according to the R-Package guidelines

4. The R-Package starts with a comprehensive introductory section which describes Uganda's involvement since 2008 in the REDD+ process with support from the FCPF. The developments started from the preparation of a Readiness Plan Idea Note (R-PIN) in 2008 when it joined the FCPF Process, a revised R-PP in 2012, received grant funding for its Forest Investment Program (FIP) in 2012, a Readiness Grant in 2013. Following a mid-term review of its progress in 2016 further funding was provided to support further activities between July 2017 and December 2019 when it is expected to have tested the activities it had presented in its draft REDD+ Strategy produced also in 2017. Support from the FCPF and other donors for readiness activities have been

presented in a comprehensive summary table, and so far the key donors have been the FCPF itself, UN-REDD and Australia Development Cooperation; with early funding provided by Norway as well.

5. The R-Package as submitted is well-structured, adequately comprehensive and generally compliant with the R-Package Assessment Framework. The progress made against each of the 34 assessment criteria are well described and the self-assessment scores are presented according to each of the stakeholder group; Core Team and the respective Technical Working Group. Uganda has clearly stated its challenges, such as, technical capacity of key institutions, dealing with land tenure and resettlement policies and the current deficiencies to develop a National Forest Monitoring System (NFMS) guided by an agreed institutional and collaborative framework.
6. The document is also clear on the various kinds of funding it has received from both bilateral and multilateral sources to support its REDD+ Readiness Process

Facilitated Self-Assessment Process

7. From the description of the process, Uganda has made it clear that it was guided by the FCPF Readiness Assessment Framework. The process was facilitated by nationals and an External Assessment Expert, and was based on the 34 assessment criteria and a set of diagnostic questions, which have been clearly presented in component-by-component summary assessment tables in the entire report.
8. The self-assessment was conducted between May and July 2018, and was facilitated by the REDD+ Secretariat and an External Assessment Expert, using FCPF Assessment Framework. It involved 108 REDD+ Stakeholders including government ministries, agencies and departments, Civil Society Organizations (CSO)/Non-Government Organizations (NGOs), Private Sector, REDD+ Taskforces, National Technical Planning Committee (NTC), National Climate Change Advisory Committee (NCCAC) and REDD+ donors.
9. The initial assessment results were discussed with relevant experts and with the REDD+ Taskforce and lead agencies. Thereafter, the REDD+ Strategy and action plan were validated by the National Technical Committee (NTC) and endorsed by the National Climate Change Advisory Council (NCCAC) in November 2017.

Time frame and development of the Readiness Process in Uganda

10. Summaries of a few key processes and milestones are hereby provided as a background to the R-Package itself.
11. Uganda first engaged in the REDD+ readiness process in 2008, when it joined the Forest Carbon Partnership Facility (FCPF). Its readiness preparation process started in earnest in the period 2010-2012 under coordination by the National Forest Authority (NFA) which established a REDD+ Secretariat and 3 Technical Working Groups. In the process an R-PP was produced in June 2012. Since July 2013 coordination of the REDD+ Process shifted from NFA to the Forest Sector Support Department (FSSD) under the Ministry of Water and Environment. In 2017 it produced its first

National REDD+ Strategy Uganda also joined the Forest Investment Program (FIP), through an official Expression of Interest in 2015 as one of its pilot countries. It produced a FIP Document in 2016 and tabled it in June 2017, to the FIP Sub-Committee of the Climate Investment Fund, where it was endorsed.

National ownership for REDD+ Readiness Process

12. The self- assessment report provides a clear picture of stakeholder participation , presents and discusses shortcomings and concludes with a first set actions listed as ‘next steps’. While the list can be made more elaborate to reflect what is in the main body of the R-package more accurately, it is clear and relevant.
13. Another interesting evidence of national ownership, is that Uganda is one of the few countries in the FCPF Group of Countries, that has created budget lines within its Central Government Budgets to support REDD+ and influence both its sector planning and local funding thereof. It is to have reduced illegal timber exports by 75% since its promulgation.
14. As reported in the section dealing with REL and RL, Uganda appears to have had a strong participation through its academic and research institutions in this technically challenging process. This is quite refreshing since most countries tend to rely solely on foreign technical expertise.

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

An overview

15. Part I of the R-Package typically describes a set of processes and achievements in chronological order, key donor support, REDD+ Coordination arrangements and Technical Support entities, as well as the key participants in the self-assessment process that produced the document under review. Most importantly, sections 1.2-1.5 of Part I describes the objectives, modalities and a summary of results of the self-assessment process. It is also stated that in Uganda, the development of the forestry sector is clearly seen as a national priority, in that Uganda's Vision 2040 has a target of restoring forest cover to 24% of Uganda's land area by 2040⁵¹, while NDP II proposes the restoration of forest cover to 18% by 2020. In this context, it is noted that Uganda produced a REDD+ Strategy and Action Plan in November 2017, National Reference Emission Level, Benefit Sharing Arrangements, Strategic Environmental and Social Assessment Management Framework and a Feedback Grievance Redress Mechanism. In addition it completed a Forest Investment Programme (FIP) which was endorsed by the Climate Investment Fund in 2016. It sees the FIP as a critical mechanism to implement its REDD+ Programme in line with the National REDD+ Strategy
16. The key achievements that have been registered between 2007 and 2017 are listed herein as follows:
- Development of an R-PP in 2012 which laid the foundation for the national REDD+ Strategy
 - Preparation of a National REDD+ Strategy in 2017
 - Draft Strategic Environmental and Social Assessment (SESA)
 - Draft Benefit Sharing Arrangements
 - Draft Feedback and Grievance Redress Mechanisms
 - Establishment of a Forest Reference Emission Level (FREL)/ Reference Level (RL) and two submissions of the same to the UNFCCC in January 2017 and a modified one in April 2018

Key Gaps identified and a work plan up to 2020

17. The bullets below represent the areas under each of the five components where Uganda would like to do more work. However, the actions under 'next steps' do not have a time frame attached to each.

National and Provincial REDD+ Management Arrangements

The self-assessment arrived at the conclusion that the processes of institutionalizing REDD+ Secretariat into FSSD/MWE is constrained by low staffing levels in the department, hence a capacitation plan for the Forest Sector Support Department within the Ministry of Water and Environment was needed.

In addition it was also agreed that information sharing needed to be considered a continuous process, since it had been constrained by fact that there are diverse stakeholders, which would require the 'packaging' of information into appropriate formats and in many local languages, recognizing the fact that some stakeholders have no access to e-communication facilities.

It was also apparent that there is need to streamline feedback mechanisms between the National REDD+ Secretariat and the participatory structures, as well as between the structures and the different stakeholders they represent

REDD+ strategy and interventions

Based on the analysis of direct and underlying drivers of deforestation and degradation, which were used to design the draft REDD+, strategy, it was concluded there is need to build capacity (human/skills and financial resources) to ensure continuous assessment of drivers of deforestation and forest degradations, so that mitigation actions would keep up with the dynamic nature of some drivers..

Alongside the mitigation strategies to address the drivers;, it was also pointed out that actions to influence or integrate development strategies, priorities and plans for key sectors such as infrastructure development (roads, rail), agriculture (livestock development, commercial agriculture) and refugee policies, would be critical to achieving emission reductions. This is an issue in which virtually all FCPF Countries have had to contend with.

Under Section 3.2.1. of the R-Package, drivers and potential options were analyzed for their policy and legal implications and implementation requirements. Hence under each strategic Option (Section 3 of the REDD+ Strategy) policy implications and requirements were assessed and presented.

While there was a conclusion that on the over-all, the policy and legal environments are conducive for REDD+, later in the document policy coordination between forestry and other sectors was identified as weak and presumably because of 'barriers' that would require comprehensive strategies and actions to overcome. These seemingly contradictory observations require some clarification.

Implementation Framework

Whilst these frameworks have been developed and ready for application, the lack to date, of legal definition of rights to carbon or carbon tenure is considered a significant gap that needs to be addressed to facilitate and incentivize implementation.

Some of the respondents were of the view that there is slow progress in adopting policy, legislation and/or regulations related to REDD+ programs and activities. This is an important observation since the National Forest Policy and the National Climate Change Strategy are considered to be generally supportive of REDD+

Social and Environmental Impacts

With regards to resettlements, the SESA recognized that the national policy for resettlement provisions in Land Act and its application in the case of oil, roads and infrastructure developments is not suited to the forestry sector and hence a need to develop policies to address people's voluntary and involuntary resettlements within forestry sector has been recognized. In this regard, The SESA also identified a need for settling historical injustices such as evictions of forest-dependent indigenous people evicted from forest reserves in early 1990's when these forest reserves were made national Parks.

While respondents on the self-assessment acknowledge and appreciate the presence of an Environmental Social Management Framework (ESMF), it has yet to be tested so that its value has yet to be fully appreciated

Reference Emission Level and Monitoring Systems

While significant progress has been made on Reference Emission Levels (REL) and Reference Levels (RL) a few areas for improvement have been identified. These include:

- Use of high satellite imagery to improve the collection and updating of activity data
- Inclusion of additional carbon pools – soil carbon, litter, dead wood and gases
- Updating the data series, data collection and analysis, strengthening national capacities for MRV system
- Piloting community-led forest monitoring with a gender-responsive approach

Monitoring Systems for Forests and Safeguards

The assessment notes that "although the NFMS and its Monitoring, Reporting and Verification (MRV) functions is not complete, institutional mandates of NFA over forest monitoring and reporting are well defined and that forest and emissions data has been disclosed and accessible from NFA and UBOS." Nonetheless, not all institutions that have the capacity and interest in monitoring and handling of data have been included.

The proposed NFMS has a useful feature in that it clearly recognizes and links a safeguards information system to that which includes the monitoring of multiple benefits and others, such as governance.

Summary of the self-assessment process shown by component

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

Proposed REDD+ Readiness Preparation Action Plan

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

PART B2. ASSESSMENT BY THE TAP

COMPONENT 1. READINESS ORGANIZATION AND CONSULTATIONS

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

- 1) Accountability and transparency
 - 2) Operating mandate and budget
 - 3) Multi-sector coordination mechanisms and cross-sector collaboration
 - 4) Technical supervision capacity
 - 5) Funds management capacity
 - 6) Feedback and grievance redress mechanism
19. The institutional arrangements that Uganda has described are clear in terms of the management of REDD. However some changes may be necessary if for example, the private sector and local government are substantively included in specific jurisdictions within the country.
20. From the self-assessment, stakeholders appreciate the level of accountability and transparency on REDD+ that is addressed under Criterion 1, even though some local community groups would like to see more.
21. Criterion 2 on operating mandates and budget has been well described in the R-Package and seems to have satisfied stakeholders during the self-assessment process.
22. On Criterion 3 which addresses the critical issue of coordination, the self-assessment has recognized its challenges, since REDD+ requires unprecedented levels of cross-sector coordination which starts with policies, laws, mandates and sector plans, which should support emission reductions or not work against it. The aspects of coordination and policy reviews to inculcate the principle of low emissions in development programming is a common challenge among many REDD+ counties. A comprehensive strategy to effect functional co-ordination with a low-emissions policy framework is needed and sectors such as; as agriculture, mining, energy transport infra-structure and others are important in that regard.
23. On Criterion 4, on technical supervision capacity, the self-assessment by Uganda has observed that technical supervisory capacity for both the National Forestry Authority (NFA) and the Forest Sector Support Department needs to be built to enable them to effectively oversee implementation of emission reduction activities. A clear time bound capacity building plan is therefore required.
24. On Criterion 6 it has been noted that a draft Feedback Grievance Redress Mechanism (FGRM) has been produced and what remains is for it to be tested as the self-assessment process has also recommended.

1b. Consultation, Participation, and Outreach (Criteria 7-10, Green)

- 7) Participation and engagement of key stakeholders
- 8) Consultation processes
- 9) Information sharing and accessibility of information
- 10) Implementation and public disclosure of consultation outcomes

25. The self-assessment process described in the R-Package demonstrates a clear and structured system of consultations that Uganda has conducted at all levels for the purposes of awareness. The document asserts that a wide range of consultations were conducted during the preparation of forest and REDD+ sector programs and processes. These include the R-PP, FIP, BSA, SESA, ESMF, the National REDD+ Strategy.

On Criterion 7 on participation, the R-Package has stated that private sector involvement and local government participation has not been adequate. As such an engagement action plan is required since in Uganda the Private Sector is strong in sectors such as ecotourism, infrastructure, commercial agriculture and forestry, oil and gas, etc. In addition local governments are crucial to political ownership of programme, implementation, monitoring and others.

26. On implementation and public disclosure of consultation outcomes, what is significant is that stakeholder concerns and opinions expressed in consultations, such as in the SESA review process were considered and reflected in the design or modification of strategy options. However examples of how stakeholder concerns were used to design or review policy documents, programme documents and even laws, have not been provided but would have been useful.

COMPONENT 2. REDD+ STRATEGY PREPARATION

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

- 11) Assessment and analysis of land use and land use change drivers
- 12) Prioritization of direct and indirect drivers/barriers to forest enhancement
- 13) Links between drivers/barriers and REDD+ activities
- 14) Action plans to address natural resource rights, land tenure, governance
- 15) Implications for forest law and policy

27. On Criteria 11, 12 and 13 is on drivers, and the in that regard, the R-Package states that comprehensive analyse of direct and underlying drivers of deforestation and degradation, were done and used to design the draft REDD+, Strategy Options. Furthermore, it was concluded that there is need to build capacity (human/skills and financial resources) to ensure continuous assessment of drivers of deforestation and forest degradations, so that mitigation actions would keep up with the dynamic nature of some drivers. This is an interesting observation which is quite relevant to drivers, since in some case a particular driver will have different effects and even trajectories depending on which geographical area it is operating in.

28. On Criterion 14, the R-Package has stated that a major gap is the absence of a carbon rights law which is also a crucial part of an implementation framework. In addition and elsewhere in the document, the issue of land resettlement and land tenure issues cannot be addressed through REDD+ Strategy Options.

29. On Criterion 15, it has been stated that the policy and legal implications of the proposed strategy options were done but no summary on what those are, or a few examples, are not provided in the R-Package.

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

- 16) Selection and prioritization of REDD+ strategy options
- 17) Feasibility assessment
- 18) Implications of strategy options on existing sectoral policies

30. Criteria 16 and 17 clearly state that it is the understanding of the stakeholders that the strategy options are feasible (going by the self-assessment rating) for implementation, but this is not associated with any economic analyses of the options.

31. On Criterion 18 the TAP notes that the R-Package states each driver and a corresponding strategy option were analysed for their policy and legal implications and implementation requirements. In addition it is stated that the overall policy requirements were assessed and presented and it was concluded there is a good policy and legal environment for REDD+. However in the same section on page 29 it has been stated that an assessment of strategic options for tackling drivers suggests that there is room to integrate policies of other sectors (infra-structure development, agriculture and livestock, refugee policies) to support REDD+. This suggests that the policy environment is not all supportive of REDD+. The policy implications of a REDD+ Strategy and its options at a national level needs to be stated more clearly, so that areas that need review are clearly spelt out.

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

- 19) Adoption and implementation of legislation/regulations
- 20) Guidelines for Implementation
- 21) Benefit sharing mechanism
- 22) National REDD+ registry and system monitoring REDD+ activities

32. On Criteria 20 and 21, the R-Package has a clear understanding of the key issues that constitute an implementation framework, and has clearly stated that the adoption of policies and laws on REDD+ has not been fully achieved and the fact that the legal definition of Carbon Rights has not been done. These are critical issues that should be clarified since they form a core part of an implementation framework

33. On Criterion 21, the draft Benefit Sharing Mechanism (BSM) , also referred to as Benefit Sharing Arrangements (BSA) is a worthwhile milestone but like other drafts, it will need to be tested and then reviewed accordingly in line with policies, laws and stakeholder interests

34. The need for a REDD+ registry has been recognized as a gap. It now needs a time-bound road map to establish a geo-referenced National Registry as Uganda has put it. .

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

- 23) Analysis of social and environmental safeguard issues
- 24) REDD+ strategy design with respect to impacts
- 25) Environmental and Social Management Framework

35. On criterion 23 dealing with analysis on safeguards, the R-Package has clearly stated Uganda's comprehensive SESA review process which produced a document which has made specific recommendations mostly on social safeguards, including engagement of IPs, dealing with historical land injustice and the potentially the problematic issue of resettlements.

36. On criterion 24 and also 25, the social and environmental safeguard assessments has provided inputs and feedback which are supposed to be taken up and implemented under the auspices of the environmental and social management frameworks (ESMF).
37. Despite years of voluntary carbon projects in Uganda R-Package has not shared any experiences that could yield lessons that the ESMF could use going forward.

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

- 26) Demonstration of methodology
 - 27) Use of historical data, and adjusted for national circumstances
 - 28) Technical feasibility of the methodological approach, and consistency with UNFCCC/IPCC guidance and guidelines
38. On Criteria 26, 27 and 28. In the R-package, Uganda is of the opinion that it has achieved significant progress in terms of methodology development under Component 3, despite the observation by the National REDD+ Task Force that there is limited capacity within the country on REL/RL.
39. On Criterion 26 and 27, on demonstration of methodology, and use of historical data respectively, the self-assessment rated this as well done. This is supported by the fact that Uganda has collected data sets on forest change from 2000 to 2015, together with emissions derived from past inventory. The same data sets were used to derive the national RL It has also submitted REL and RL to the UNFCCC in both 2017 and 2018; a process which has been undertaken by a local university with support from FAO.
40. While Uganda seems bent on adding more carbon pools to its system, including soil carbon it is not clear that they have critically examined methodological challenges associated with the estimation of soil carbon.

COMPONENT 4. MONITORING SYSTEMS FOR FORESTS AND SAFEGUARDS

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

- 29) Documentation of monitoring approach
 - 30) Demonstration of early system implementation
 - 31) Institutional arrangements and capacities - Forests
41. On Criterion 29, it has been noted that Uganda has clearly stated and used its forest definitions consistently and has a well-documented national land cover classification.
42. On criterion 30 Uganda has not shared any experiences on the applicable of social and environmental safeguards. This may be because the REDD+ Strategy is a first at the national level. However some experiences from existing Voluntary Carbon Projects could yield useful information on safeguard issues.

43. On Criterion 31, on institutional arrangements, Uganda has rightly stated that it needs an institutional framework to implement a National Forest Monitoring System (NFMS) and also include those institutions with capacity for monitoring, but which have not been brought on board. In line with that it will need to agree on the necessary modalities for multi-institutional collaboration.

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

32) Identification of relevant non-carbon aspects, and social and environmental issues

33) Monitoring, reporting and information sharing

34) Institutional arrangements and capacities – Multiple Benefits and Safeguards

44. In general, Criteria 32 to 34 has been identified as ‘work in progress’ but the good thing is that what is missing has been presented, a road-map is in place and a comprehensive monitoring systems for multiple benefits, safeguards, governance should be in place by December 2019.

SUMMARY ASSESSMENT AND RECOMMENDATIONS TO THE PC

Based on the TAPs assessment of the R-Package self-assessment report, and accompanying documents, namely the R-PP, the Mid-Term Review and the FIP, the process as described in the document was well organized and conducted over a 3 month period, between May and July 2018. The areas that need further work have been stated by the Country Team and as such the TAP commends the process, the clarity of reporting and the identification of the remedial actions. The TAP has just a few comments that could be considered to improve the R-Package.

45. On matters regarding the coordination of REDD+ at a national level and in the long-term, policy coordination across sectors that will affect the implementation and success of Uganda’s REDD+ Programme and the FIP which is one of its key mechanisms, should be stated more explicitly than is currently the case.

46. In addition to what the self-assessment observed, inclusion of local governments and the private sector as partners in the implementation of the REDD+ Strategy is and worthwhile and should be supported by a clear objective-led action plan.

47. The economic feasibility of strategy options and their carbon abatement potentials could also be included in the R-Package.

48. While adding additional carbon pools to generate a further improved REL and RL, Uganda should critically assess the current methodologies for soil carbon assessment in order to overcome the technical challenges associated with that.

49. The development of a National Forest Monitoring System (NFMS) will require a clear and agreed collaborative framework, protocols and processes for collecting and handling data and information. As mentioned in the R-Package more institutions will need to be brought on board to support FSSD.