

Comments from the Climate, Community and Biodiversity Alliance (CCBA) on the draft FCPF Carbon Fund Methodological Framework (September 5, 2013)

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The CCBA is a partnership of five leading conservation and development non-governmental organisations: Conservation International, CARE, the Rainforest Alliance, the Nature Conservancy and Wildlife Conservation Society.

The following comments were prepared by the CCBA secretariat, with the support of the member organizations, based on the alliance's ten years of experience designing and managing the leading social and environmental standards for REDD+: Climate, Community & Biodiversity Standards for land-based carbon projects and the REDD+ Social & Environmental Standards for government-led REDD+ programs. The comments are focused on the safeguards requirements for the social and environmental quality of qualifying ER Programs.

We welcome the opportunity to provide comments on the Methodological Framework and believe that a few changes to the language in the framework explained below would be very helpful in clarifying for countries what they have to demonstrate and achieve in relation to safeguards, without changing the apparent intent of the Carbon Fund participants.

In addition, the REDD+ SES Initiative provides guidelines for a multi-stakeholder, inclusive and transparent process for monitoring and reporting on safeguards and non-carbon benefits performance so the CCBA would be pleased to provide input to the plans for a 'good practices annex' mentioned on p.18.

Proposed text changes and additions (highlighted in red):

Indicator 23.1 just repeats the criterion and does not clarify what the ER Program has to do to meet the indicator. It would be greatly strengthened by adding

Indicator 23.1 The ER Program **demonstrates that it** meets the World Bank social and environmental safeguards, and promotes and supports the safeguards included in UNFCCC guidance related to REDD+, by paying particular attention to Decision 1/CP16 and its Appendix 1 as adopted by the UNFCCC **through the implementation of adequate Safeguards Plans and provision of relevant safeguards monitoring information.**

Indicator 23.2 Safeguards Plans **address** (not just consider) social and environmental issues **and define** (again, not just consider) related risk mitigation measures....

Indicator 24.1 is particularly weak as there is no guidance on what constitutes 'appropriate' monitoring arrangements for safeguards. This would be greatly strengthened by adding **'to show how the ER Program meets the World Bank social and environmental safeguards and addresses and respects the safeguards included in UNFCCC guidance related to REDD+'.** Note that here it should say 'addresses and respects' since this is the UNFCCC language for safeguards information.

Indicator 24.2 should also require **provision of information on the results of monitoring arrangements for safeguards** and not just information on implementation. This is a major shortcoming as there is currently no requirement to share results of monitoring.

It would be very much clearer, and consistent with Carbon Fund Methodological Framework treatment of benefit sharing plans, if the same language used for Criterion 29 is repeated for Safeguards Plans ie. **designed in a consultative, transparent and participatory manner appropriate to the country context**'. At present, there is only a requirement for disclosure of Safeguards Plans, but not for an inclusive process for their design. There should also be a requirement for **transparent** implementation of the Safeguards Plans, as is required for the implementation of benefit sharing plans.