



*for a living planet®*

Bureau National du Programme WWF en RDC  
14, Avenue Sergent Moke  
Commune de Ngaliema  
Kinshasa  
République Démocratique du Congo

Tel. (243) 998913773-  
(243) 976006100  
B.P. 2847 Kinshasa I  
Fax: +243 81 261 6169  
E-mail : [wwfrdc@wwf.panda.org](mailto:wwfrdc@wwf.panda.org)  
Website : [www.panda.org](http://www.panda.org)

February 29, 2016

To Mr. Victor KABENGELE WA KADILU  
REDD National Coordinator DRC  
N°63 Bis, avenue Colonel Mondjiba à Kinshasa/Ngaliema  
(Réf : Concession COTEX)

Réf: WWF-RDC/DN/FY16/526/bp/JCM

Concern: Draft program of ERPD to the FCPF

<b>CN REDD</b>	Ministère de l'Environnement Conservation de la Nature et Tourisme
Reçu le:	03/03/2016
N°d'enreg:	
Heure:	
Par:	Fec [Signature]
Signature	[Signature]

Dear CNREDD Coordinator,

WWF would like to take this opportunity to provide comments on the draft program document (ERPD) recently submitted to the Carbon Fund at the World Bank's Forest Carbon Partnership Facility (FCPF). The draft ERPD has been assessed by a Technical Advisory Panel (TAP) contracted by the FCPF, and will now be considered by Carbon Fund Participants to identify any fundamental concerns before a final ERPD is submitted for consideration by the Fund.

The prospective Mai Ndombe REDD+ program would include the entire Mai Ndombe province and its growing population of over 1.5 million people. WWF DRC is the Executing Agency for the related Forest Investment Program (FIP) PIREDD project in the Plateau District and has contributed with other stakeholders to the design of the proposed Carbon Fund program. We believe this program represents an unprecedented opportunity to advance a green growth model that benefits both people and nature in Mai Ndombe and that could potentially be replicated to advance sustainable development elsewhere in DRC and Africa. More specifically, our hope is that this program will strengthen local governance across the program area, provide enhanced opportunities for sustainable livelihoods to Mai Ndombe's communities, help to conserve the region's globally unique biodiversity and provide important climate adaptation and mitigation benefits by reducing deforestation and degradation.

The proposed program is highly ambitious and could present significant risks if there is not a clear enough roadmap for implementation; utmost transparency and inclusiveness in implementation; consistent application of Free, Prior and Informed Consent (FPIC); and robust implementation and monitoring of social and environmental safeguards throughout the life of the program. Even if considerable progress has been made during the last year, we think the draft ERPD should still be improved.

15



*for a living planet®*

Bureau National du Programme WWF en RDC  
14, Avenue Sergent Moke  
Commune de Ngaliema  
Kinshasa  
République Démocratique du Congo

Tel. (243) 998913773-  
(243) 976006100  
B.P. 2847 Kinshasa I  
Fax: +243 81 261 6169  
E-mail : [wwfrdc@wwf.panda.org](mailto:wwfrdc@wwf.panda.org)  
Website : [www.panda.org](http://www.panda.org)

As one of the first examples of a jurisdictional emission reductions program in Africa, it is also essential that the Mai Ndombe program is built on a transparent forest carbon baseline and monitoring system. Emission reductions achieved during the program should be clear and irrefutable in order to demonstrate the integrity of results from jurisdictional REDD+ programs and to attract needed additional political and financial support for REDD+ implementation in DRC and beyond.

Consistent with the purpose of the Draft ERPD review, we outline a number of fundamental issues below that should be addressed and incorporated into the final ERPD before Carbon Fund approval of this program. Be assured that these views are submitted in support of a final program design that has the greatest potential to succeed and reap important benefits for Mai Ndombe in the coming years.

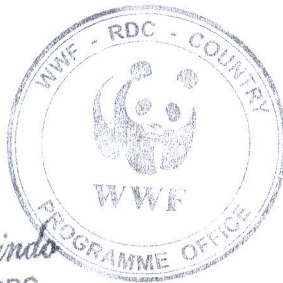
We look forward to continue working together with partners and stakeholders in Mai Ndombe to make this program as successful as possible.

Sincerely,

Jean Claude Muhindo

WWF DRC Nation Director a.i.

*Jean Claude Muhindo*  
Country Director WWF - DRC  
WWF Regional Office for Africa







*for a living planet®*

14, Avenue Sergent Moke  
Commune de Ngaliema  
Kinshasa  
République Démocratique du Congo

(243) 976006100  
B.P. 2847 Kinshasa I  
Fax: +243 81 261 6169  
E-mail : [wwfrdc@wwf.panda.org](mailto:wwfrdc@wwf.panda.org)  
Website : [www.panda.org](http://www.panda.org)

## WWF Comments on DRC DRAFT ERPD (dated January 15, 2016)

### Reference level

1. For the UNDEF/UNDEG REL, the ERPD shows an annual deforestation rate of 1.12%. This is approximately 500% of the national deforestation rate based on the FACET data (0.23% for 2000-2010) and approximately 400% of the national deforestation rate provided in the ERPD (0.30% for 1990-2010; page 119, section 9.6; source unclear). We acknowledge that Mai-Ndombe may have a higher deforestation rate compared to the national average and that the results of manual classification approach cannot be compared directly to FACET and other products because of the different methodologies used. However, given these discrepancies and the need for a forest monitoring approach that withstands scientific scrutiny and demonstrates climate integrity, the program should a) make the data used for estimation of REL publicly available (Methodological Framework Criterion 6) and b) conduct a comparative analysis of the results between studies (e.g., FACET, FAO/DIAF) to explain and resolve discrepancies, including a comparison of uncertainties of different products available.
2. In line with the comments from the TAP, we consider the inconsistency of UNDEF/UNDEG MRV with UNDEF/UNDEG REL to be problematic; however, if the sampling approach is used for MRV, the program will not meet the requirement to align the program MRV methodology with the National MRV approach, which is a wall to wall /spatially explicit. A methodology should be selected that is consistent both internally (between REL and MRV) and with the national approach (Methodological Framework Criteria 9 and 10).
3. We view it as potentially problematic that the program identifies DRC as an HFLD-country based on a low national deforestation rate, but then rationalizes the adjustment based on the much higher deforestation rate of the program area. Given that the UNDEF/UNDEG clearly shows an increase in emissions over the reference period (doubling in 2010-2012 from previous intervals; Winrock report), it is also not clear that Methodological Framework Indicators 13.2 and 13.3 are met. Further clarification is needed regarding what known/documented changes in program circumstances will increase emissions beyond those reflected in the historical average.

### Description of the actions and interventions

4. The operational implementation process of the different interventions and their estimated contribution to total expected emission reductions should be clearer. The document should provide additional details with respect to responsibilities for the implementation of specific mitigation activities and their estimated carbon benefits, monitoring of the implementation process and the mechanisms for financial flows through the different institutional levels. This should include how



14



*for a living planet®*

Bureau National du Programme WWF en RDC  
14, Avenue Sergent Moke  
Commune de Ngaliema  
Kinshasa  
République Démocratique du Congo

Tel. (243) 998913773-  
(243) 976006100  
B.P. 2847 Kinshasa I  
Fax: +243 81 261 6169  
E-mail : [wwfrdc@wwf.panda.org](mailto:wwfrdc@wwf.panda.org)  
Website : [www.panda.org](http://www.panda.org)

they provide financial incentives down to community level (e.g., through further elaboration of the PES proxy program). WWF will be available to support the further development of these aspects.

#### **Entities responsible for the management and the implementation of the ER Program**

5. The provincial government is assigned primary responsibility for implementation of the programs with support of a program management unit and a multi-party steering committee. WWF supports this orientation. However, the terms of the "agreement protocol" (Section 1.2, p. 23) between the provincial and national governments are not clear. More specific information is needed to clarify relative roles of national and provincial bodies to deliver this function.

#### **Benefit Sharing**

6. Benefit sharing plan needs additional elaboration providing the required transparency before the program is approved and launched (Methodological Framework Criteria 29 and 30, and comments by Carbon Fund Participants reflected in Chair Summary of 9<sup>th</sup> Meeting of Carbon Fund). Clear mechanisms and criteria for benefit sharing and finance flows are essential for active participation and buy-in by local communities and stakeholders. WWF is available to work with other program implementers to advance the benefit sharing arrangements before program launch.

#### **Evaluation of land tenure systems and access to resources**

7. Land tenure insecurity in Mai Ndombe is identified as an important indirect cause of deforestation and degradation. Therefore, it should be carried forward into the program activities (Methodological Framework Criterion 28). Relevant elements of the road map/action plan of the suggested governmental activities referenced in DRC's Readiness Package should be advanced further as part of the ER program.

#### **Safeguards**

8. The description of safeguards and non-carbon benefits are vague and mainly conceptual. The viability and sustainability of this program hinge on inclusive, fair and transparent implementation. Safeguards and non-carbon benefits therefore demand a more explicit and integrated approach including specific indicators and adequate monitoring plans and roles/responsibilities that are clearly demarcated for the success of the program. WWF will be available to further support the development of safeguard procedures.

