Synthesis Review of Dominican Republic, R-PP November 2013

Forest Carbon Partnership Facility (FCPF) Readiness Mechanism
Readiness Preparation Proposal (R-PP) External Review Template
(internin, December 13, 2012, from Program Document FMT 2009-1, Rev. 6)

Guidelines for Reviewers:

1) FCPF REDD Country Participant R-PPs will be reviewed and assessed by the FCPF Participants Committee, the FCPF’s governing body, taking TAP comments into account. External (Technical Advisory Panel or other) and Bank reviewers may provide recommendations on how a draft R-PP could be enhanced, using this template on a pilot basis until a process is approved by the PC.

2) One set of criteria should be used for review: specific standards each of the current 6 components of an R-PP should be met.

3) Your comments will be merged with other reviewer comments (without individual attribution) into a synthesis document that will be made public, in general, so bear this in mind when commenting.

4) Please provide thoughtful, fair assessment of the draft R-PP, in the form of actionable recommendations for the potential enhancement of the R-PP by the submitting country. A REDD Country Participant would be allowed three submissions of an R-PP to the PC for consideration.

Objectives of a Readiness Preparation Proposal (condensed directly from Program Document FMT 2009-1, Rev. 3)

The purpose of the R-PP is to build and elaborate on the previous Readiness Plan Idea Note (R-PIN) or a country’s relevant comparable work, to assist a country in laying out and organizing the steps needed to achieve ‘Readiness’ to undertake activities to reduce emissions from deforestation and forest degradation (REDD), in the specific country context. The R-PP provides a framework for a country to set a clear roadmap, budget, and schedule to achieve REDD Readiness. The FCPF does not expect that the activities identified in the R-PP and its Terms of Reference (ToR) would actually occur at the R-PP stage, although countries may decide to begin pilot activities for which they have capacity and stakeholder support. Instead, the R-PP consists of a summary of the current policy and governance context, what study and other preparatory activities would occur under each major R-PP component, how they would be undertaken in the R-PP execution phase, and then a ToR or work plan for each component. The activities would generally be performed in the next, R-PP execution phase, not as part of the R-PP formulation process.

Review of R-PP of: Dominican Republic
TAP Team: Gisela Ulloa and Ben De Jong

Summary of findings and recommendations

The TAP finalized the review of the first formal version (September 10th 2013) of the Dominican Republic R-PP on October, 2013.

Recommendations were sent and November 8th a revised version is received, the new version the R-PP improvement and we welcome the great deal of effort, invested by the Dominican Republic team in the development of the document.

Overview:
Dominican Republic is a country with a population of 9.2 million from which 68% is urban, their service sector represents 64% of their GDP followed by its industry sector with 29%, and the forest cover has increased 12.2% in the last 15 years due to a shift to services and industry from an agriculture oriented economy. The forest sector can become a net carbon sink.

**RPP Strengths:**

The RPP is well written and includes all the major elements, and the proposal is robust as it is but requires minor improvements, most of the components are considered largely met.

The RPP and REDD+ early discussion in DR is extensive and has started since 2012

**RPP Challenges:**

A participatory approach for REDD+ strategy development requires a solid conflict and grievance resolution mechanism for its success. The Dominican Republic TAP review process applies a classification scheme as follows:

- **Standard Met** (no further work needed to describe the actions proposed under this standard)
- **Standard Largely Met** (proposed work is acceptable, but can be enhanced with additional information)
- **Standard Partially Met** (some additional information is required before the proposed strategy fulfills the terms of the standard)
- **Standard Not Met** (information is incomplete and does not fulfill the terms of the standard)

The findings for the initial Belize TAP review are summarized in the table below:

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<td>2a: Land Use, Forest Law, Policy and Governance</td>
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<td>3: Reference Level</td>
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<td>Largely Met</td>
<td>Met</td>
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<td>5: Budget</td>
<td>Largely Met</td>
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Component 1. Organize and Consult

Standard 1a: National Readiness Management Arrangements:

The cross-cutting nature of the design and workings of the national readiness management arrangements on REDD, in terms of including relevant stakeholders and key government agencies beyond the forestry department, commitment of other sectors in planning and implementation of REDD readiness. Capacity building activities are included in the work plan for each component where significant external technical expertise has been used in the R-PP development process, and mechanisms for addressing grievances regarding consultation and participation in the REDD-plus process, and for conflict resolution and redress of grievances.

The RPP provides background information describing the many intuitions participating in the preparation of the REDD+ program. Four key and very important points are raised regarding the institutional arrangements to prepare the program implementation:

a. The creation of a special organization backed by required instrument and enough political decision-making drive.

b. The effective "anchorage" the REDD Strategy on different government sectors and institutions.

c. A coordinating mechanism for all government, private and social participating institutions have being designed.

d. An effective administration and coordination of the organizations financing the REDD+ program, Figures 1 and 2 clarify the way in which all participating institutions will be synchronized.

A Mesa de Dialogo Forestal (Forestry Dialogue Bureau) is proposed as the permanent coordinating body of participating institutions. This is a well thought instance to supervise and coordinate the design and execution actions, policies and concrete proposals.

The preparation of the proposal has been carried out with a wide participation of various stakeholder groups, as can be derived from the long list of participants in the elaboration of the document. The results of 7 informative workshops are available in the internet, which were used to develop meetings with stakeholder, in particular representatives of communities and other actors of the REDD+ Bureau. These activities indicate that the REDD+ R-PP is widely accepted as a work plan by the important stakeholder groups. Key issues that have to be treated during the Readiness phase are identified and the proposed mechanisms include extensive consultations with the stakeholder groups, putting emphasis on developing a true appropriation of the REDD+ strategy by the whole society. The proposed plans of action are extensive and put special attention to a participatory approach in all stages.

The RPP have include in the Mesas Nacionales y Regionales REDD+ the additional role to receive complaints and grievance but a mechanism for grievance and conflict resolution needs to be neutral to a discussion, consultation and information process therefore require a separate structure.

The document restates Dominican Republic does not have "indigenous ethnic" groups and vulnerable groups had and will continue participating in the REDD+ process.

Recommendations:

The grievance and conflict resolution mechanism needs to be better described by including the
discussion already taken place and potential courses of action for its design and implementation.

Fig 1. Requires a better explanation to add value to the document.

The REDD+ process requires full and effective stakeholder participation, specifically from IPs and vulnerable groups. The DR R-PP should lay out clearly the process to be followed to ensure such participation, including how IP claims will be dealt with.

Dominican Republic should carefully read the advice from the Indigenous Peoples TAP expert as suggested during the TAP-Government conference call held in October, as a way forward to be presented in the R-PP.

**Conclusion: Largely Met**

**Standard 1b: Information Sharing and Early Dialogue with Key Stakeholder Groups:**

The R-PP presents evidence of the government having undertaken an exercise to identify key stakeholders for REDD-plus, and commenced a credible national-scale information sharing and awareness raising campaign for key relevant stakeholders. The campaign’s major objective is to establish an early dialogue on the REDD-plus concept and R-PP development process that sets the stage for the later consultation process during the implementation of the R-PP work plan. This effort needs to reach out, to the extent feasible at this stage, to networks and representatives of forest-dependent indigenous peoples and other forest dwellers and forest dependent communities, both at national and local level. The R-PP contains evidence that a reasonably broad range of key stakeholders has been identified, voices of vulnerable groups are beginning to be heard, and that a reasonable amount of time and effort has been invested to raise general awareness of the basic concepts and process of REDD-plus including the SESA.

Although various stakeholder groups already participated in the elaboration of the document (see the long list of participants), in this section it is pointed out that in the preparation phase special attention will be given to include as much groups as possible to develop the national REDD+ strategy. In the document it is mentioned that in recent years about 30 workshops were held about REDD+ with participation of representatives of various organizations, in which various questions were raised that will be handled during the preparation stage.

Considerations of gender inclusion in this subcomponent (1b1 and 2) reflect the importance the government has given to the identification of key stakeholders to ENREDD + and has initiated an exchange of information with the public.

Note that the group of actors involved in REDD+ exceeds the 20 public and private institutions related to forest farmers (1b4), giving this participation in GTN-REDD+.

**Conclusion: Met**

**Standard 1c: Consultation and Participation Process**

Ownership, transparency, and dissemination of the R-PP by the government and relevant stakeholders, and inclusiveness of effective and informed consultation and participation by relevant stakeholders, will be assessed by whether proposals and/or documentation on the following are included in the R-PP (i) the consultation and participation process for R-PP development thus far.

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3 Did the R-PP development, in particular the development of the ToR for the strategic environmental and social assessment and the Consultation and Participation Plan, include civil society, including forest dwellers and Indigenous Peoples representation? In this context the representative(s) will be determined in one of the following ways: (i) self-determined representative(s) meeting the following requirements: (a) selected through a participatory, consultative process; (b) having national coverage or networks; (c) previous experience working with the Government and UN system; (d) demonstrated experience serving as a representative, receiving input from, consulting with, and providing feedback to, a wide scope of civil
**Reviewer's assessment of how well R-PP meets this standard, and recommendations:**

The results of 7 informative workshops are available in the internet, which were used to develop meetings with stakeholder, in particular representatives of communities and other actors of the REDD+ Bureau. These activities indicate that the REDD+ R-PP is widely accepted as a work plan by the important stakeholder groups. Key issues that have to be treated during the Readiness phase are identified and the proposed mechanisms include extensive consultations with the stakeholder groups, putting emphasis on developing a true appropriation of the REDD+ strategy by the whole society. The proposed plans of action are extensive and put special attention to a participatory approach in all stages.

**Recommendations:**

Expand on the process and mechanisms to address grievances and recommendations of relevant stakeholders, grievances relating to consultation and participation and for resolution of conflicts and compensation claims.

The REDD+ process requires full and effective stakeholder participation, specifically from IPs and vulnerable groups. The DR R-PP should lay out clearly the process to be followed to ensure such participation, including how IP claims will be dealt with.

Dominican Republic should carefully read the advice from the Indigenous Peoples TAP expert as suggested during the TAP-Government conference call held in October, as a way forward to be presented in the R-PP.

**Conclusion: Standard Largely Met**

**Component 2. Prepare the REDD-plus Strategy**

**Standard 2a: Assessment of Land Use, Land Use Change Drivers, Forest Law, Policy, and Governance:**

A complete assessment is presented which identifies major land use trends; assess direct and indirect deforestation and degradation drivers in the most relevant sectors, recognizes major land tenure and natural resource rights and relevant governance issues; documents past successes and failures in policies implementation and measures to address drivers of deforestation and forest degradation; identifies significant gaps, challenges, and opportunities for REDD+; and sets the stage for development of the country’s REDD+ strategy.

The component gives sources of information of the process of historical land-use change, that indicate that the country is converting from a high deforestation country into a net reforestation country in terms of area change, but in certain areas there is still gross deforestation occurring. **This means that the process of forest degradation or loss of carbon stock is an important issue in the RD.**

The current legal situation, from which the governance situation can be assessed, seems to indicate that broad participation in land-use based decision making is guaranteed by law, although some institutions seem not to function yet. The RPP identifies the current shortcomings in the legislation and regulations and put special attention on the outstanding issues, to be treated during the Readiness stage.

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society including Indigenous Peoples organizations; or (ii) Individual(s) recognized as legitimate representative(s) of a national network of civil society and/or Indigenous Peoples organizations (e.g., the GEF Small Grants National Steering Committee or National Forest Program Steering Committee).
One important issue is the land-tenure situation in the RD, where 50% of the rural population has no access to land and the additional 40% that have access to land, own less than 1.2 has each. This can put a heavy constraint on a future success of REDD+ activities and the component does not indicate how this will be coped with in the readiness stage.

The component gives an explanation why the country is changing from a net deforestation to a net reforestation country, among others the success of the establishment of protected areas, forest management plans and plantations. The component gives an outline of actions that need to be developed during the readiness stage to improve the knowledge about the processes and their effects, in order to improve decision making in the REDD+ national strategy.

A major policy initiative like the ongoing formulation of a national land management plan, which could become an important opportunity to address REDD+ and to engage key stakeholders, is not considered in the assessment presented in the R-PP, where land planning is approached almost entirely from a forest management driven perspective.

**Recommendations:**

**Key Recommendations:**

1. Include information and linkages to National Land Management plan discussion
2. Describe how the policies, decisions, and institutions have influenced the attitudes and interactions of stakeholders in relation with land use trends and deforestation and degradation drivers.
3. Compare the successes and failures in implementing policies for addressing deforestation and forest degradation, contrasting command and control vs. other policies, and their impacts on forest governance and on the trends shown in different tables.

**Conclusion:** **Standard Largely Met**

**Standard 2.b: REDD-plus strategy Options:**

The R-PP should include: an alignment of the proposed REDD-plus strategy with the identified drivers of deforestation and forest degradation, and with existing national and sectoral strategies, and a summary of the emerging REDD-plus strategy to the extent known presently, and of proposed analytic work (and, optionally, ToR) for assessment of the various REDD-plus strategy options. This summary should state: how the country proposes to address deforestation and degradation drivers in the design of its REDD-plus strategy; a plan of how to estimate cost and benefits of the emerging REDD-plus strategy, including benefits in terms of rural livelihoods, biodiversity conservation and other developmental aspects; socioeconomic, political and institutional feasibility of the emerging REDD-plus strategy; consideration of environmental and social issues; major potential synergies or inconsistencies of country sector strategies in the forest, agriculture, transport, or other sectors with the envisioned REDD-plus strategy; and a plan of how to assess the risk of domestic leakage of greenhouse benefits. The assessments included in the R-PP eventually should result in an elaboration of a fuller, more complete and adequately vetted REDD-plus strategy over time.

**Reviewer’s assessment of how well R-PP meets this standard, and recommendations:**

The R-PP set up how the country intends to address the drivers of deforestation and degradation in the design of the strategy ENREDD+. Moreover, a plan of how they should estimate the costs and
benefits of the strategy ENREDD+, including benefits in terms of livelihoods of the rural population, conservation of biodiversity and other aspects of development, socio-economic viability, political and institutional framework of the strategy. ENREDD+ taking in consideration, environmental and social risks, addresses the potential synergies on forestry, agriculture, transport and other sectors. ENREDD+, presents a plan on how to assess the risk of internal leakage of greenhouse benefits.

This component gives an extensive list of options with which the process of deforestation and forest degradation can be tackled. It is suggested to order them according to the driver of deforestation or degradation it will attend and identify the relative importance and location of such driver as well as the options available.

The component outlines an approach to the options of a national REDD+ strategy, but you need to see the synergies between sectors, especially the biodiversity and tourism, and consider the cost-benefit plan linked to rural livelihoods.

Under “Presentacion” on page 69, there is a brief mention about safeguards (i.e actions to reduce potential emission leakages). Further elaboration on this item is recommended so as to clarify the identification of studies or any anticipated activities to consider and address safeguards as required by the RPP.

One important issue that is not mentioned is that the introduction of natural gas as a substitute for the use of fuel wood can be considered as a possible source of national leakage in terms of net GHG emissions, and how this will be attended during the readiness stage.

The Government may well propose new cross-cutting policies, but it is important to acknowledge the cross-cutting policies already established by law 1-12 in the NDS 2030, and to envision how they will be mainstreamed within the REDD-plus strategy.

Recommendations:

Key Recommendations:

- Describe the introduction of natural gas as a substitute for the use of fuel wood and how can be considered as a possible source of national leakage in terms of net GHG emissions, and how this will be attended during the readiness stage.
- Organize each option or set of options by driver including if possible government area responsible of that specific element/option.
- Elaborate on “identification of required studies” to address potential emission leakages.

Conclusion: Standard Largely Met

Standard 2.c: REDD-plus implementation framework:

Describes activities (and optionally provides ToR in an annex) and a work plan to further elaborate institutional arrangements and issues relevant to REDD-plus in the country setting. Identifies key issues involved in REDD-plus implementation, and explores potential arrangements to address them; offers a work plan that seems likely to allow their full evaluation and adequate incorporation into the eventual Readiness Package. Key issues are likely to include: assessing land ownership and carbon rights for potential REDD-plus strategy activities and lands; addressing key governance concerns related to REDD-plus; and institutional arrangements needed to engage in and track.
REDD-plus activities and transactions.

Reviewer’s assessment of how well R-PP meets this standard, and recommendations:

This component identifies the major outstanding issues that may hinder a future implementation of a REDD+ strategy, such as the land tenure issue, that have to be resolved during the readiness stage. It lists various action points that resulted from the extensive consultation workshops held previously. It indicates how REDD+ could be implemented first as a pilot project from which lessons could be learned for a subsequent national strategy. Particularly the land tenure situation in the RD needs special attention during the readiness stage. There are initiatives underway that may facilitate the registration of land property and thus reduce the procedure. The document mentions that currently a study is underway to assess the land tenure and carbon tenure situation.

**Conclusion: Standard Met**

**Standard 2.d: Social and Environmental Impacts during Readiness Preparation and REDD-plus Implementation:**

The proposal includes a program of work for due diligence in the form of an assessment of environmental and social risks and impacts as part of the SESA process. It also provides a description of safeguard issues that are relevant to the country’s readiness preparation efforts. For FCPF countries, a simple work plan is presented for conducting the SESA process, cross referencing other components of the R-PP as appropriate, and for preparing the ESMF.

**Reviewer’s assessment of how well R-PP meets this standard, and recommendation**

The component gives a brief outline of how the actors will be selected that will be key for the SESA process. It also indicates that studies may need to be defined that are required to be able to justify the discussions on possible social and environmental impacts of REDD+ alternatives. During the readiness process criteria and indicators will be defined, based on the results of the specific studies, for which a participatory approach that include all key actors is proposed. The results will be publicly available. The final report of the SESA will be the starting point to define how social and environmental impacts will be treated in the national REDD+ strategy.

**Recommendations:**

**Key Recommendations:**

1. The R-PP can be further reinforced by adding a concise description of the process that will be used to carry out the SESA, including the institutions involved, roles and responsibilities, and outputs to be produced.
2. The R-PP can be further strengthened by including social and environmental issues that have already been identified in the consultation process.
3. The document should also describe the social and environmental review process that will be used for sub-national projects.
4. Describe the country system in place for environmental and social impact assessment if available
5. Define GAP between both WB/ common approach requirements and country system
6. Define a program of work for all elements above
7. To use in the description of 2.d the World Bank’s operational policies for example Environmental Management Framework of World Bank, Indigenous Peoples Planning Framework of World Bank, Process Framework of World Bank, UN-REDD Programme Social and Environmental Principles and Criteria (SEPC), and The Cancun COP Decision 1/CP.16,
Safeguards.

8. Review and amend the budget based on the revisions made to this component (2d).

Recommendations:

**Conclusion: Standard Largely Met**

**Component 3. Develop a National Forest Reference Emission Level and/or a Forest Reference Level**

**Standard 3: a National Forest Reference Emission Level and/or a Forest Reference Level**

Present work plan for how the reference level for deforestation, forest degradation (if desired), conservation, sustainable management of forest, and enhancement of carbon stocks will be developed. Include early ideas on a process for determining which approach and methods to use (e.g., forest cover change and GHG emissions based on historical trends, and/or projections into the future of historical trend data; combination of inventory and/or remote sensing, and/or GIS or modeling), major data requirements, and current capacity and capacity requirements. Assess linkages to components 2a (assessment of deforestation drivers), 2b (REDD-plus strategy activities), and 4 (monitoring system design).

(FCPF and UN-REDD recognize that key international policy decisions may affect this component, so a stepwise approach may be useful. This component states what early activities are proposed.)

**Reviewer’s assessment of how well R-PP meets this standard, and recommendations:**

The component describes the proposed methodology to establish a national forest reference level, which indicates that RD will use a stepwise approach that will lead to a spatial referenced RL. Special attention will be given to the state of the forests in terms of C-stocks, as the existing forests may be threatened by a process of continued degradation. This is very important as there seems to be various land use and land-use change processes occurring at the same time, such as deforestation, reforestation (recovering of forests) and logging. As the country intends to develop the 5 proposed REDD+ activities, it is important to analyze all sources of GHG emissions and removals occurring in the landscape and to define the spatial variation of these. The component indicates how the LU change process will be determined from the available satellite imagery and how the emission/removal factors will be determined for the major LU types.

**Conclusion: Standard Met**
**Component 4. Design Systems for National Forest Monitoring and Information on Safeguards**

**Standard 4a: National Forest Monitoring System:**

The R-PP provides a proposal and workplan for the initial design, on a stepwise basis, of an integrated monitoring system of measurement, reporting and verification of changes in deforestation and/or forest degradation, and forest enhancement activities. The system design should include early ideas on enhancing country capability (either within an integrated system, or in coordinated activities) to monitor emissions reductions and enhancement of forest carbon stocks, and to assess the impacts of the REDD-plus strategy in the forest sector.

The R-PP should describe major data requirements, capacity requirements, how transparency of the monitoring system and data will be addressed, early ideas on which methods to use, and how the system would engage participatory approaches to monitoring by forest–dependent indigenous peoples and other forest dwellers. It should also address independent monitoring and review, involving civil society and other stakeholders, and how findings would be fed back to improve REDD-plus implementation. The proposal should present early ideas on how the system could evolve into a mature REDD-plus monitoring system with the full set of capabilities.

(FCPF and UN-REDD recognize that key international policy decisions may affect this component, so a staged approach may be useful. The R-PP states what early activities are proposed.)

This component describes well the major constraints the country currently faces in terms of MRV capacities and gives an outline of the capacity building and information requirements needed to be able to develop a robust MRV system. It gives an outline of the institutions that will be involved in the MRV and the personnel required. It describe how local communities and other local actors may get involved in the MRV process in the component there is a detailed description how the proposed work plan will evolve into a robust and mature MRV system. Future adjustments to the MRV due to requirements of UNFCCC and other international policy decisions related to MRV for REDD+ is envisioned.

**Conclusion: Standard Met**

**Standard 4b: Designing an Information System for Multiple Benefits, Other Impacts, Governance, and Safeguards:**

The R-PP provides a proposal for the initial design and a workplan, including early ideas on capability (either within an integrated system, or in coordinated activities), for an integrated monitoring system that includes addressing other multiple benefits, impacts, and governance. Such benefits may include, e.g., rural livelihoods, conservation of biodiversity, key governance factors directly pertinent to REDD-plus implementation in the country.

(The FCPF and UN-REDD recognize that key international policy decisions may affect this component, so a staged approach may be useful. The R-PP states what early activities are proposed.)

**Reviewer’s assessment of how well R-Plan meets this standard, and recommendations:**

The component describes how a baseline will be developed to evaluate the social and environmental impacts of future REDD+ initiatives, taking into account the lessons learned from earlier experiences. Based on this, the criteria and indicators will be developed in a participatory process to monitor the compliance of the social and environmental safeguards, as defined by WB and UNFCCC. Possible constraints to develop the national information system on safeguards are identified. The document describes how the social and environmental impacts will be monitored. The
conservation of biodiversity is considered an important element, as the DR is one of the richest islands in terms of vascular plants, with a high percentage of endemism.

**Conclusion: Standard Met**

**Component 5. Schedule and Budget**

**Standard 5: Completeness of information and resource requirements**

The R-PP proposes a full suite of activities to achieve REDD readiness, and identifies capacity building and financial resources needed to accomplish these activities. A budget and schedule for funding and technical support requested from the FCPF and/or UN-REDD, as well as from other international sources (e.g., bilateral assistance), are summarized by year and by potential donor. The information presented reflects the priorities in the R-PP, and is sufficient to track the costs associated with REDD-plus readiness activities identified in the R-PP. Any gaps in funding, or sources of funding, are clearly noted.

The DR REDD+ Strategy requires 6.97 US$ million to be implemented in a 4 year period where the DR government will contribute with 1.43 US$ million and the REDD+/ CCAD/GIZ program with 1.74 US$ million and 3.80 US$ millions are required from the Forest Carbon Partnership Facility (FCPF).

It is suggested to sum up the budget per component to have an overview of the allocation of funds for DR REDD+ strategy.

**Conclusions: Standard Met**

**Component 6. Design a Program Monitoring and Evaluation Framework**

**Standard 6:** The R-PP adequately describes the indicators that will be used to monitor program performance of the Readiness process and R-PP activities, and to identify in a timely manner any shortfalls in performance timing or quality. The R-PP demonstrates that the framework will assist in transparent management of financial and other resources, to meet the activity schedule.

This component provides an outline on how the program monitoring and evaluation framework will be developed and which institution will be responsible for it. It presents an M&E outline with the major components listed, the results and products expected in each component, the activities that will be carried out, and the indicators with which the fulfillment of the component can be assessed and the time scale required.

The R-PP of DR determines to develop an M & E plan with a high detail level, using specific logical frameworks for each component and subcomponent. The development of the M & E plan will seek not only monitor progress regarding the implementation of measures and the establishment of results and products themselves, but also verify product quality and performance, and its proximity to the compliance standards established or to establish both participatory and consultative processes.

**Conclusion: Standard Met**