

**FCPF Secretariat's reply to REDD Monitor questions on FCPF and the process of R-PP preparation in Honduras**

**From:** FCPF Secretariat/Service/World Bank  
**To:** Chris Lang <reddmonitor@googlemail.com>  
**Date:** 03/06/2012  
**Subject:** Re: Fwd: Honduras and FCPF  
**Sent by:** Benoit Bosquet

Dear Mr. Lang,

Thank you for your comments and questions on the REDD+ readiness preparation process in Honduras and the role of the FCPF. We appreciate your questions and welcome the opportunity to provide answers.

Question 1: "How is it possible that the R-PP was produced without consulting the most representative body of indigenous peoples in Honduras? Isn't this in breach of the World Bank's policy on indigenous peoples?"

Answer:

The question does not accurately reflect the nature of the R-PP or the appropriate application of Bank policy and FCPF requirements. It is important to highlight that REDD+ countries that participate in the Forest Carbon Partnership Facility's (FCPF) Readiness Fund carry out the work in two stages:

- 1) The formulation of a Readiness Preparation Proposal (R-PP), which outlines the studies and activities a government proposes to undertake to become "ready" for REDD+ including, among other things, how it plans to conduct a Strategic Environmental and Social Assessment and how it intends to consult with key stakeholders while preparing for REDD+. The Government of Honduras is currently at this stage of work.
- 2) Readiness preparation, where the government carries out the activities laid out in its R-PP to prepare to engage in REDD+, including carrying out the consultations with key stakeholders. This stage begins after the R-PP has been formally assessed by the FCPF's Participants Committee and a Readiness Preparation grant agreement has been signed with the country to support its activities.

At this point, the Government of Honduras has submitted a draft R-PP for early feedback and is still in the process of formulating its R-PP, so it is expected to be engaging key stakeholders, but not yet carrying out fuller consultations. This aspect of the R-PP process has been extensively and openly discussed and resolved under the R-PP guidelines.

Accordingly, the Government of Honduras has engaged with stakeholders in the process leading to the formulation of the draft R-PP, while clearly stating that there is a need for further outreach to more stakeholders, including to afro-descendent peoples' and Indigenous Peoples' organizations, and setting forth plans for this. The latest draft R-PP is available at <http://www.forestcarbonpartnership.org/fcp/Node/172>. Your question refers to a letter written by the Confederation of Autochthonous Peoples of Honduras (CONPAH) regarding the decision of the Government of Honduras to present the draft R-PP for early feedback (not approval – please see below) from the FCPF Participants Committee. We would like to offer the following comments on this letter.

A country may submit an R-PP either as an informal (draft) R-PP for early feedback from the PC, or as a formal R-PP for assessment by the PC at the next PC meeting. Honduras submitted the first draft of its R-PP in December 2011 for informal presentation to and early feedback from the PC at the eleventh PC meeting to be held in March 2012. However, the government then decided to postpone its presentation of the draft R-PP to the PC until a later date.

It is therefore not the case that Honduras submitted the (final) R-PP "to the FCPF for approval", as the CONPAH letter suggests. In fact, it is important to note that R-PPs are never approved by the PC. The PC assesses R-PPs and approves, as the case may be, grant allocations to support the government in carrying out the activities outlined in the R-PPs. Please also note that the FCPF Facility Management Team (FMT) responded on February 14, 2012 to a query from Mr. Joshua Lichtenstein of the Bank Information Center, that "the R-PP of Honduras is slated for an informal presentation only". At the time, the FMT was unaware of the intentions of the government of Honduras to withdraw the R-PP.

The CONPAH letter mentions free, prior and informed consent (FPIC) as mandatory by FCPF guidelines. This is not accurate. The FCPF applies the World Bank's Operational Policies and Procedures, including those on safeguards. Operational Policy 4.10 on Indigenous Peoples specifies that the Bank provides project financing only where free, prior, and informed consultation results in broad community support by the affected Indigenous Peoples. Although OP 4.10 does not expressly refer to FPIC, if the country has ratified ILO Convention No.169 or adopted national legislation that sets a higher standard than the Bank, or if the Bank is working on a project with a development partner that has a more stringent standard than its own, the Bank has agreed that will in turn support adherence to ILO Convention 169 and/or that more stringent standard. Indeed, the Common Approach to Environmental and Social Safeguards for Multiple Delivery Partners of the FCPF states that "if the environmental and social safeguard policies and procedures of the Delivery Partner are more stringent and/or protective than those of the World Bank, the Delivery Partner shall apply its policies and procedures to activities undertaken under the FCPF Readiness Fund." (See <http://www.forestcarbonpartnership.org/fcp/node/301>.) Honduras is one of the nine pilot countries where the Multiple Delivery Partner arrangement will be applied. Honduras has declared its interest in working with the United Nations Development Programme (UNDP) as Delivery Partner.

Question 2: "Why has the World Bank not posted the letter from CONPAH on the FCPF website?"

Answer:

Following agreement by the Government of Honduras, we have now posted the letter at <http://www.forestcarbonpartnership.org/fcp/node/203>.

Question 3: "The letter from the Honduran government refers to a series of comments by the Technical Advisory Panel on the R-PP. Why is the TAP report on the R-PP not available on FCPF's website?"

Answer:

Honduras submitted the first draft of its R-PP in December 2011 for a review process according to established procedures. Generally, a country's first draft R-PP undergoes two rounds of comments from an independent Technical Advisory Panel (TAP) and an additional review by members of the FCPF Participants Committee (PC). The TAP includes specialists on a wide range of topics relevant to the cross-sectoral character of an R-PP, including in-country experts, sector experts, and an expert on issues relating to Indigenous Peoples and other forest dwellers.

The preparation of a draft R-PP entails a lot of early thinking. As each draft undergoes two rounds of review, the country has the opportunity to improve it. The TAP's first round of comments allows the Government to further improve and enhance the draft document, after which the TAP conducts its second round of review and revises and finalizes its comments as needed, before the R-PP is presented as an informal (draft) R-PP for early feedback from the PC or a formal R-PP for assessment by the PC at the next PC meeting. Once the TAP conducts this second round of review, the revised, finalized comments are made publicly available on the FCPF website.

In this specific case, Honduras originally planned to present its draft R-PP to the PC for early feedback at the eleventh PC meeting to be held in March 2012. The R-PP underwent the standard review process, and an indigenous expert from one of the major Indigenous Peoples groups participated in the review. However, only a draft TAP review took place before the process was interrupted due to the government's decision to postpone its presentation of the draft R-PP to the PC to a later date. Therefore the TAP comments have not been finalized, and will not be finalized, until after the government decides to resume its R-PP submission, at which point the TAP comments will be made publicly available on the FCPF website.

Question 4: "CONPAH's letter includes a demand that "GIZ, Rainforest Alliance, USAID, UNDP and other Bilateral and Multilateral collaborators suspend all activities and financing related to the REDD processes in Indigenous and Afro-Honduran territories." How does the Bank intend to respond to this demand?"

Answer:

The FCPF has not yet provided support to Honduras. The FCPF and the designated Delivery Partner will work with the government on how best to proceed with REDD+ readiness preparation in Honduras taking into account the importance of stakeholder engagement and consultation in the process.

Question 5: "Germany is the largest funder of the FCPF. As you know, last year the German government issued a new human rights policy. This policy specifically includes the principle of free, prior and informed consent and states that Germany "endorses, promotes and advocates" that the World Bank and other multi-lateral agencies turn their attention to the issue of human rights compliance. Yet the World Bank's policy on indigenous peoples only requires free, prior and informed *consultation*. Will the World Bank ensure that the principle of free, prior and informed consent is applied in the production of R-PPs, in Honduras and elsewhere? And if not, why not?"

Answer:

The formulation of an R-PP is not yet the formulation of a country's REDD+ strategy, but rather the description of steps that the country will take to prepare itself to be "ready" for REDD+ over time. These steps will entail preparing a clear strategy, institutional framework, benefit sharing mechanism, registry, reference level, and system for measurement, reporting and verification. The participation of key stakeholders, including forest dwelling Indigenous Peoples and Afro-descendants, throughout the process is key for the future success of REDD+. It is important that governments engage with key stakeholders in the formulation of an R-PP, which includes the plan of how they intend to consult with others when preparing for REDD+. It is in the process of readiness preparation that they will then carry out those consultations.

The FCPF's *Common Approach to Environmental and Social Safeguards for Multiple Delivery Partners* (see <http://www.forestcarbonpartnership.org/fcp/node/301>) is designed to provide the World Bank and other FCPF Delivery Partners with a common platform for risk management and quality assurance in the REDD+ Readiness Preparation process, using the safeguard policies of the World Bank as a minimum acceptable standard. World Bank projects that affect Indigenous Peoples will not be approved unless it is found that there has been free, prior and informed consultation of the Indigenous Peoples leading to their broad community support. World Bank safeguard policies (see <http://go.worldbank.org/WTA1ODE7T0>) especially the Indigenous Peoples policy, explains in detail how that is achieved and documented. If a Delivery Partner working with a country has more stringent rigorous standards than the World Bank, these will apply. In countries that have ratified ILO Convention 169, the Convention will apply to readiness preparation.

The FMT appreciates your questions and takes the concerns raised seriously. We have an open and continuous dialogue with the representatives of Civil Society Organizations in the FCPF Participants Committee on the matter of participation and consultation and welcome further interaction on these issues.

Sincerely,

Benoît Bosquet  
FCPF Partnership Coordinator