Forest Carbon Partnership Facility (FCPF) Readiness Mechanism Readiness Preparation Proposal (R-PP) External Review Template

(interim, January 10, 2011, from Program Document FMT 2009-1, Rev. 5)

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 for Cambodia

Reviewer: Denmark & Nepal

Date of review: February 2011

Standards to be Met by R-PP Components

(From Program Document FMT 2009-1, Rev. 5:)

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.

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

The R-PP builds to a large extent on the Cambodia REDD+ Roadmap. The R-PP provides an excellent overview of the REDD+ process in Cambodia to date, the institutions involved and an analysis of drivers of deforestation and forest degradation. The R-PP acknowledges that REDD+ should to the extent possible be integrated in existing organisational structures and policies. The document provides a structure for future consultations and adoption of lessons learned.

It is of outmost importance that the R-PP is fully aligned to and builds on the priorities and strategies elaborated in the National Forest Programme (NFP, 2010-29) of Cambodia and the National Protected Areas Strategic Management Plan, which again link up to overall country strategies i.e. the Rectangular Strategy and National Strategic Development Plan. The NFP is further aligned to the Paris Declaration for Effective Aid Implementation (2006). The implementation of REDD+ activities through the NFP and the National Protected Areas Strategic Management Plan (NPASMP) will facilitate effective basket funding and avoid unnecessary parallel organisational structures.

The R-PP links up with the new NFP in many places (p. 42, 53, 80, 108) but in other places the message is somewhat more blurred or ambiguous. The R-PP should consistently acknowledge its integration into the NFP and the NPASMP. Parallel structures, organisations and activities should be avoided (see further below). It is particularly noteworthy that the role of fishing communities has been highlighted.

The proposed National Coordination Arrangement is vast in terms of bodies and members of the specific bodies: the NCCC -Taskforce, Taskforce Secretariat, Advisory Group, Consultation Group, four Technical Teams, Forestry Administration (MAFF) and General Department of Administration for Nature Conservation and Protection (MoE) (p.16-20). It is questioned whether such heavy organisation is needed and whether it can indeed effectively coordinate across government and produce results on the ground.

The suggested organisational structure results in numerous consultations, meetings, minutes, reports etc. This is reflected in the budget, in which substantial financial resources, 1.5 million USD, are allocated for meetings/administration (Table 1a) plus another 600.000 USD for consultations and participation activities (Table 1c). This is likely to divert efforts from the objective of conserving and enhancing carbon stocks on the ground. For comparison, designing and implementing strategies to address drivers from outside the forestry sector has a budget of 110.000 USD (Table 2b).

The role of the National Climate Change Committee appears limited or in competition with that of the new proposed REED+ Taskforce (p. 13). It is stated on p. 18 that "the Taskforce sends reports to the NCCC" where it could be more logical and efficient if the Taskforce in fact reported to the NCCC. It could be considered whether the NCCC should play a stronger role.

It is recommended to consider:

- a) establishing a simpler REDD+ readiness structure by:
 - o reducing the number of members in all bodies (while maintaining the cross government memberships in the REDD+ Taskforce);

- o abandoning the REDD Advisory Group such that development partners and experts provide inputs to REDD+ consultation group and/or technical teams;
- o operate with a minimum of technical groups (less than four);
- o an effective secretariat of 2-3 staff with support functions (and not with representatives from many organisations);
- o convert a considerable part of the management activities and consultation budgets to actual on the ground activities (baseline, MRV, mitigation of key drivers and demonstration projects).
- b) avoiding "administrations within the administration".
 - o Number of secretariats: The R-PP lists the role of the TWG F&E Secretariat and possibly a new TWG Secretariat on environment and climate under the GDANCP as well. We suggest that the REDD operations are considered executed through the already established secretariats instead of building additional secretariats.
 - o It should be made clear that REDD+ activities are part of the NFP and NPSAMP and monitoring is to be undertaken by existing monitoring/FLEG mechanisms/units in the Forestry Administration and the GDANCP respectively, possibly under supervision by the REDD+ Taskforce. This to avoid parallel systems for monitoring of natural resources.
- c) establishing a regular external and independent review of the monitoring and safeguards.

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.

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

As noted above, the REDD roadmap has constituted a framework for national consultations and dialogue with key stakeholders for the preparation of the R-PP in 2009 and 2010. A national forum and other workshops have been organised. It appears that a wide range of different voices have been heard in these processes. Nonetheless, there does not appear to have extensive consultation at local, district and provincial levels. Organising such "sub-national" consultations will be essential.

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 far³ (ii) the extent of ownership within government and national stakeholder community; (iii) the Consultation and Participation Plan for the R-PP implementation phase (iv) concerns expressed and recommendations of relevant stakeholders, and a process for their consideration, and/or expressions of their support for the R-PP; (v) and mechanisms for addressing grievances regarding consultation and participation in the REDD-plus process, and for conflict resolution and redress of grievances.

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

In the R-PP it is envisaged that government institutions will take the lead in REDD+ process and membership of the task force is limited to Government institutions. <u>It is recommended</u> that the R-PP acknowledges the importance of further engaging civil society in decision-making (not only in consultations). The expertise and voices of non-governmental organisations are crucial, so "space" should be created for their participation in decision making.

CSOs listed are specific to the climate and REDD network (p. 29, Table 5). The inclusion of CSOs with broader interests in natural resource management should be considered. NGOs, especially those that are closely affiliated with and dependent on collaboration with a government institution can hardly represent CSOs in any body (p.14) and neither can NGOs represent Development partners (p. 14). Indigenous peoples' territories are closely linked to areas of highest carbon density within Cambodia (p.103). Therefore, indigenous peoples' representation should be actively pursued.

<u>It is recommended</u> to provide options for involvement of CSOs with both direct and indirect interests in REDD+. The particular interest and vulnerability of indigenous groups in the REDD process should be acknowledged by securing their representation in both consultation groups and technical teams (on e.g. the application of safeguards and benefit sharing arrangements). <u>It is also recommended</u> to engage INGOs, local universities and international knowledge institutions as needed and as indicated (p. 22; 101).

Component 2. Prepare the REDD-plus Strategy

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

A completed assessment is presented that: identifies major land use trends; assesses direct and indirect deforestation and degradation drivers in the most relevant sectors in the context of REDD-plus; recognizes major land tenure and natural resource rights and relevant governance issues; documents past successes and failures in implementing policies or measures for addressing drivers of deforestation and forest

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 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).

degradation; identifies significant gaps, challenges, and opportunities to address REDD; and sets the stage for development of the country's REDD strategy to directly address key land use change drivers.

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

The R-PP lists key drivers of deforestation and forest degradation (Table 6). Corruption ought to be mentioned as driver. It is unclear how the main drivers (economic land concessions, in-migration and roads/mines) are to be mitigated other than through existing management strategies. Land grabbing is specially mentioned as an indirect driver of deforestation.

<u>It is recommended to identify</u> counter measures to the key drivers of deforestation and forest degradation listed. This would include elaboration on efforts to reduce corruption associated with concessions granted in forested land and in former forest concessions, as well as infrastructure development (roads/mines) in forested land.

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:

A range of different options are outlined in the R-PP, pertaining to improved management of the permanent forest estate, protected areas and "flooded forests and mangrove areas in the fisheries domain." Clarifying management rights of local people is mentioned as critical. However the strategy does not outline how this will be undertaken and achieved. Various approaches to innovative financing models, law enforcement and governance, forest protection, ecosystem service payments, etc. are identified. As noted above, the roadmap appears to constitute an important foundation for the REDD+ strategy.

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:

Conflicts are central in sustainable forestry and natural resource management in Cambodia. The R-PP addresses conflicts many places but refers only to the "Commercial Arbitrage Council" or the "National Committees for Land Disputes", "National Authority of Forest Land Conflict Resolution" (p. 52). Such committees are however not geared to deal with ongoing natural resource conflicts.

Furthermore, recent research highlights that REDD+ may increase natural resource conflicts. With reference to the many conflicts over natural resources in Cambodia, the lack of conflict management capacity by Forestry Administration and the GDANCP is seen as an indirect driver to deforestation.

<u>It is recommended</u> that the R-PP addresses how to build capacity in conflict management in natural resource management (including in REDD+ activities).

The R-PP states on p. 46 that the Forestry Administration will not launch additional REDD demonstration/pilot projects before the ongoing ones are completed. However, this appears to contradict the need expressed on p. 55 for piloting for example new payment for environmental services (PES) projects.

<u>It is recommended</u> to consider how the present R-PP can be more practically oriented with a larger proportion of efforts and budget going to direct carbon sequestration activities in the field.

The R-PP should clearly support innovative conservation projects (PES, conservation concessions, etc. which include elements of REDD+). Site-based approaches have so far proven most effective in mitigating drivers of deforestation. Learning by doing from such projects is a promising approach to integrated natural resource management.

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

The proposal includes a program of work for due diligence for strategic environmental and social impact assessment in compliance with the World Bank's or UN-REDD Programme's safeguard policies, including methods to evaluate how to address those impacts via studies, consultations, and specific mitigation measures aimed at preventing or minimizing adverse effects. For countries receiving funding via the World Bank, a simple work plan is presented for how the SESA process will be followed, and for preparation of the ESMF.

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

The R-PP includes a reasonably thorough outline of social and environmental impacts, though it is noted that the section needs to be updated. In this connection it may also be worth re-considering the budgetary allocation for SESA work; 100,000 USD may be insufficient to undertake all the tasks indicated (p. 60-61).

Component 3. Develop a Reference Level

Standard 3: 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 (MRV 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 R-PP has the right approach and describes most important components in developing a national reference level. It is advised to ensure harmonisation and joint analysis of the carbon plot data, which seems to be based on a number of different projects. This will be mandatory to be able to report using Tier 2 or Tier 3. The costs of this are not directly indicated in the budget.

Preferably the reference level should be closely linked to the development of Component 4 - as the reporting will have to be consistent with the Reference Level data. In the COP 16 papers inclusion of harvested wood products have been mentioned. This is not addressed in the R-PP. The historical emissions and removal factors may be difficult to assess with mainly remote sensing data as sources - as interpretation from different years may vary significantly. On the other hand the reference level has to be estimated on best available data and in a transparent way. This may be obtained by the suggested approach.

The budget for the overall Reference Level Activity is reasonable, even though the activity "Quantify activity data (land-use change assessments)" may lead to higher costs, as the uncertainty of the change detection based on satellite imagery requires in depth analyses.

Component 4. Design a Monitoring System

Standard 4a: Emissions and Removals:

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.

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

The component has the right approach and describes most important components in developing a national monitoring system. The uncertainties in securing consistency and identification of changes over time from remote sensing are challenges facing REDD+ in general and will apply to Cambodia as well. The monitoring should be independent from the REDD +Task Force and central REDD+ bodies. It should be an integrated part of the NFP monitoring system; potentially developed in tandem with FLEGT. In some countries the development of baselines and monitoring of carbon stocks is placed within the university sector. This could be considered.

Monitoring should be mandated to focus on main drivers of deforestation, i.e. economic land concessions, illegal logging, roads/mines. If the monitoring unit is placed within FA and MoE as suggested, it should be submitted to independent review (annually).

It is wise to develop guidelines for on-the-ground surveys as part of the National Forest Inventory (NFI) p. 77. For carbon stock measurements it is recommended to limit sampling to trees > 5 or 10 cm dbh. Large trees make up more than 95% of the biomass. It is very time-consuming to include herbs, seedlings, saplings, and there is little in-country botanical capacity to identify to species level.

Major training needs p. 78: It is recommended to specify training of communities to undertake field measurements of carbon stocks. Research has shown that community based monitoring of carbon stacks have the same accuracy as scientist executed monitoring. At the same time community based monitoring is faster, cheaper and often leads to local initiatives to conserve carbon stocks. Universities should be mentioned as important partners in training component.

Standard 4b: Other Multiple Benefits, Impacts, and Governance:

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:

A preliminary work plan for the design of monitoring system covering environmental benefits (biodiversity, water quality, etc.) socio-economic indicators and governance is included in the R-PP. However, further specification of the monitoring arrangements (baselines, data collection, etc) will be required. It is envisaged that this will be done by one of the technical teams.

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 meet the costs associated with REDD-plus readiness activities identified in the R-PP. Any gaps in funding, or sources of funding, are clearly noted.

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

The total budget is very large, nearly 11 million USD. As noted above, there may a case for reducing the allocation for coordination and administration (component 1) and increasing the amount available for SESA work (component 2).

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.

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

A risk log is provided, which is commended. Seven risks (institutional) are identified and so are their counter measures and "owners" (p. 94-96). Management response and owners to take action are largely identified as external entities; Task Force, UN agencies and advisors. Risks regarding failure to reduce emission levels are not included. There are shortcomings on transparency, engagement and accountability in monitoring, whether commitments to community benefits are fulfilled.

<u>It is recommended</u> to consider whether the Government agencies having the authority, the decision power should be the major responsible owner of risks and responsible for taking counter measures. The role of UN-agencies could be to monitor.

<u>It is recommended</u> to integrate conflict management capacity and mechanisms into the REDD+ development design and budgets. Alternatively, resource conflicts should be listed as high probability and impact in the risk log.

<u>It is recommended</u> to include key drivers of deforestation in present or additional risk-log (ref. to earlier comments on strategy to tackle key drivers).

<u>It is recommended</u> to describe an accountable and transparent monitoring system to assess whether commitments to community benefits are fulfilled.