

Review of the revised R-PP of: Madagascar

Reviewer : Stephen Cobb and 4 other TAP reviewers

Date of synthesis of reviews : 7 May 2014

Date of revised synthesis: 13 June 2014

Standards to be Met by R-PP Components

(From Program Document FMT 2009-1, Rev. 6:)

Overview

An update of the R-PP has been undertaken and presented by the Government of Madagascar, introducing the activities implemented in the REDD+ process between the assessment by the TAP in January 2013 and this present submission. The update takes into account some of the recommendations of the TAP from January 2013. **A revised R-PP was submitted by Madagascar on 9th June 2014 and the changes in the TAP assessment are included here in red.**

Strengths of the R-PP

Despite the political crisis, which ended in January 2014 (but which is not yet fully resolved), the Malagasy team was able to conduct business not only in terms of implementation of REDD+ projects but also in launching its related processes, including discussions started on the baseline, the MRV and the mechanisms of benefit sharing. These efforts, which are mentioned in the document are commendable, under the difficult circumstances faced by the country. Related legal texts have meanwhile been passed, for example creating the national REDD+ coordination unit.

In particular, a great deal of work has been put into the analysis of the causes of deforestation and degradation, but that was in a domain whose standard (2a) had already been met.

One thing deserving of a mention here is the excellent Executive Summary that has been provided (and updated in this latest round).

The reviewers are very conscious of the long time that has elapsed between Madagascar's first submission and the present one, and of the strength of purpose that lies behind it. We believe that attention to the detail of our comments over the next few weeks should make it possible for the majority of the remaining unmet standards to be reached.

Key issues

The TAP has reviewed Madagascar's submissions to the PC on two (three?) previous occasions. The TAP review of the 2010 R-PP draft stated that most components met the

standard except 1a, 2b, and 5, noting that the standard for components 3 and 4 were largely met. In the review of the R-PP of January 2013, there was extensive new material in components 2 (2a, 2b, and 2d), 3, and 4. Component 5 had not changed very much.

As we show in the table below, the R-PP has not made as much progress as it might have done since then. Although in 2013 seven of the standards had been met, and five of them had been partially or largely met, that situation has not actually changed in the April 2014 submission. The technical areas still in need of further work are 1a, 1c, 2b and 4b, just as they were in January 2013. Component 5 also needs to be worked on.

We have taken the view that if a standard was met in the previous submission, we cannot go back on that assessment now (even though some new reviewers might have wished us to do so).

Despite the excellent improvements to the analysis of the causes of D and D (Component 2a), and the clear efforts that have been made to modify the strategies to be put in place to deal with them (Component 2b), the TAP reviewers still feel that the strategic approach is somewhat divorced from the reality of the agricultural and land-use practices that have to be confronted, halted and reversed if REDD+ is to be an effective instrument of carbon-stock management.

A general feature of the R-PP is that the work proposed and the institutions involved have given the TAP review team a strong sense of being both rather centralized and still too heavily concentrated around the forest sector. The national policies of decentralization, so important to REDD+, need to be backed by a clearer pathway describing the constitution and powers of the proposed decentralized REDD+ commissions.

A related issue, that occurs at many points throughout the document, is that the involvement of local communities appears to have been marginalized: both in the preparatory thinking and consultations and as participants in the future programme. This R-PP remains weaker than that of many countries in this respect, even though this same comment was also made a year ago.

Key recommendations

Although seven of the twelve standards have been met, we have taken the opportunity to point out areas of improvement that would assist Madagascar to have a better thought out and better planned document, to take their work on REDD preparation more rapidly and assuredly to the next stage. We encourage the team to take these comments (for those seven Components where the standard has already been fully met) as seriously as is possible, though they are not mandatory.

For the other five components (there is one where the standard is only partially met and a further four where they are largely met), there is clearly work still to be done.

Specific recommendations for those five components where further work is needed are as follows (more detail is to be found, and should be responded to, under each component in the following pages):

Component 1a requires two principal remedial actions. The authors need to explain more fully how the decentralized commissions are going to become an

effective part of this multi-disciplinary development process; and they should spell out more clearly how they propose to engage the agriculture sector more fully in the management and decision-making structures that are outlined in the R-PP. **The first of these comments has been given reasonable treatment, while the second is slightly more equivocal: important roles in the advisory and management structures of REDD+ are given to the Minister of Agriculture, but it remains to be seen whether this will be enough.**

Component 1c lacks a convincing description of the elements that would be included in a future communications strategy and a convincing and inclusive consultation plan, that clearly defines the roles of the different institutions involved (including the Civil Society platform). **Much work has been done to improve this component and although the text does not yet contain perfect answers to these points, the component is now much more convincing.**

Component 2b describes a wide range of issues as being important for arresting losses due to Deforestation and Degradation, yet no effort has been put into ordering them into a ranked set of priorities (ranking by proportion of loss, or endangerment of ecosystems, or some other metric). Too much is deferred to pilots and studies, when in fact much is already known and could be converted at once into strategic policy directives. The authors are urged to tighten up the arguments and to link them more coherently to the causes of Deforestation and Degradation identified in the previous component. Rather few changes have been made to the Strategic options, but enough to elevate the assessment by one notch. **The final judgment is, though, that the standard is only largely met; what prevents it being fully met is that the strategic options under consideration seem too strongly focused on improving the REDD+ capabilities of the conventional forest sector, and not enough on confronting the fundamental causes of deforestation and degradation, which are to be found in rural households and agricultural practices.**

Component 4b needs to be more explicit about the institutions responsible for monitoring the various component parts of the programme, and in particular, what types of indicator would be used to measure performance and how those indicators would be measured. **Although neither of these points has been fully addressed, enough other new information has been provided to reassure us that the expectations of the standard have been met.**

Component 5 on the budget and work programme still needs quite a bit of work, in particular to reveal the other sources of finance that are expected or sought, to enable the funding gap between the FCPF contribution and that from other partners, to be met. The planning, timing and interconnectedness of activities generally needs a good bit of additional thought and attention, and clarity is required on whether this is a two or three-year programme. The budget tables (and the implicit workplans) must correspond, between the tables at the end of each component, and the combined table here in Component 5. **Most of this has now been attended to, with the exception of the identification of other funding sources. This prevents it from fully meeting the standard.**

With goodwill and energy, we believe that these shortcomings could be fairly quickly

remedied, since most of them lie within the competence of the editorial team and do not require further external consultation.

| Standard | Initial evaluation by TAP (October 2010) | Revised evaluation by TAP (January 2013) | Current evaluation by TAP (April 2014) | Final evaluation by TAP (June 2014) |
|---|---|---|---|--|
| 1a. National Readiness Mgmt. Arrangements | Standard not met | Standard largely met | Standard largely met | Standard met |
| 1b. Information sharing, Stakeholder Dialogue | Standard met | Standard met | Standard met | Standard met |
| 1c. Consultation and Participation Process | N/A | Standard largely met | Standard largely met | Standard met |
| 2a. Land Use, Forest Law, Policy and Governance | Standard met | Standard met | Standard met | Standard met |
| 2b. REDD+ Strategy Options | Standard not met | Standard partially met | Standard partially met | Standard largely met |
| 2c. Implementation Framework | Standard met | Standard met | Standard met | Standard met |
| 2d. Social & Environmental Impacts | Standard met | Standard met | Standard met | Standard met |
| 3. Reference Level | Standard largely met | Standard met | Standard met | Standard met |
| 4a. Monitoring - Emissions and Removals | Standard largely met | Standard met | Standard met | Standard met |
| 4b. Other Multiple Benefits, Impacts and Gov | N/A | Standard largely met | Standard largely met | Standard met |
| 5. Schedule and Budget | Standard not met | Standard partially met | Standard partially met | Standard largely met |

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|--|--------------|--------------|--------------|---------------------|
| 6 Monitoring & Evaluation Program | Standard met | Standard met | Standard met | Standard met |
| <p>Component 1. Organize and Consult</p> <p>Standard 1a: National Readiness Management Arrangements:</p> <p>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.</p> <p>Reviewer's assessment of how well R-PP meets this standard, and recommendations:</p> <p>Observations:</p> <p>The R-PP for Madagascar, submitted by the General Directorate of Forestry in the Ministry of Environment and Forests, identifies three tiers of national management of the REDD+ readiness process: the Interministerial Environment Committee (CIME, a body which is already operational) which will have responsibility for national strategic and political decision making; the Pilot Readiness Platform for REDD+ Preparedness (Plateforme REDD+), which will have responsibility for formulating the national REDD+ strategy and guaranteeing participation of diverse sectors and stakeholders as well as having responsibility for intersectoral conflict resolution and presiding over the development of necessary reforms for REDD+ implementation; and the Office of National REDD+ Coordination (BCN-REDD+), which will have responsibility for implementing the programme and assembling technical reports and methodologies (MRV, Reference Scenario, SIS) as well as for operational management (Strategic Social and Environmental Safeguards (EESS) and legality) and coordination of the national REDD+ readiness process (communication, evaluation). A Financial Agent will also be selected, possibly from an existing national financial institution, such as the Fondation Tany Meva, set up as part of a previous World bank-funded national environment programme, to provide secure funding for small-scale community development enterprises on the periphery of protected areas.</p> <p>A recent positive step has been taken in the formalization, by a Ministerial text, of the existence of the National REDD Coordination Office (the BCN-REDD).</p> <p>The R-PP outlines the diverse composition of the Pilot Readiness Platform with 32 representatives, including public administrators from the forests, environment, water, agriculture, animal husbandry, fishing, energy, mining, water, land, and finance sectors, Malagasy civil society, COBA regional community representatives, private sector, technical and financial sector, national environmental organization representatives, other regional representatives, and research and university representatives. How the representatives of these interest groups will all be nominated, is not made clear.</p> <p>TAP reviewers remain concerned by the relative lack of engagement in the process and the structures, of the Ministry of Agriculture, despite the clear evidence that is later presented in Component 2a, that agricultural practice (and malpractice) is at the root of most forest loss in Madagascar. This must be given more serious thought, if the programme as a whole is to succeed.</p> | | | | |

The structures that will resolve grievances, particularly at a local level, are not sufficiently clearly described.

Recommendations:

The list of recommendations which follows is very similar to that in the TAP review of January 2013, and the recommendations all still need to be attended to. They are as follows:

- Although the list of participants in the REDD Pilot Readiness platform appears long, there are notable absences, such as the agencies already implementing REDD pilot projects, agents of deforestation such as the mining companies themselves. No role is apparent in the organigramme (or in the text) for important agencies such as the Office Nationale de l'Environnement (ONE) and Madagascar National Parks (MNP). **This needs to be clarified.** The composition of the Platform as presented in the main text does not match that in Annexe 1a; **this needs to be edited. Both of these have now been attended to.**
- Later in the document, much attention is given to the need to decentralize the REDD+ process, yet here, there is no indication at all that the Pilot Readiness Platform is anything but a very centralized body. How this transition is to be managed, to meet the nation's decentralization policies, really **needs to be explained. There is a new paragraph that goes some way to explaining this transition towards a more decentralised approach.**
- The Ministry of Environment and Forests contains both a Directorate of Climate Change and a General Directorate of Forestry. It is this latter which will be in charge of the overall process, through housing the BCN-REDD+. The relationship with the Directorate of Climate Change (which includes a REDD service) is nowhere mentioned. **It needs to be. This does not seem to have been done.**
- The R-PP reports that CIME and Plateforme REDD+ will be responsible for resolving "intersectoral conflicts"; however a clear outline of mechanisms for addressing grievances associated with the REDD-plus process **should be more clearly specified.** Although there is an opportunity to do this again in Component 2c, the conflict resolution mechanisms are not spelt out there, either. So we would advise that it be done here. **A very minor modification to the text has been made, which does not throw much light on this.**
- The R-PP does not clearly delineate what process or criteria will be used for election or appointment of Plateforme REDD+ representatives; nor is it clear how the BCN Coordinator will be appointed: by nomination from within the civil service, or by public open recruitment? The reviewers have a preference for the latter, but whichever is the case, it **should be stated. This is now stated, the choice being within the sole power of the D-G of Forests, with a right of non-objection by FCPF's Implementation Partner for Madagascar.**
- CIME is not listed as having been consulted in the preparation process and it is therefore not certain that the Committee will be ready to take on the responsibilities ascribed to it in the RPP. **This needs to be clarified. This does not seem to have been done**
- It is not clear whether the BCN-REDD+ will provide secretariat services to the CIME on REDD matters, and to the REDD-Platform, for all its work. **This should be stated, but does not appear to have been.** Nor is it clear what professional skills will be represented in the

BCN-REDD (ie the structure of it), which makes it hard to judge how the budget was arrived at for this component. **This has not been changed, but on re-reading the original, the description is in fact adequate at this stage.** The budget figure given in Table 1a does not match that in Component 5: **this needs to be sorted out.**

- The R-PP indicates that its development spanned 4 years due to “political constraints” and a period which saw a significant change in the composition of the national REDD Technical Committee (CT-REDD). The R-PP **should address any important considerations** associated with the forthcoming political elections in Madagascar, including the potential role of donors after a new political settlement in the country. **The R-PP is quite forthright, particularly in the Executive Summary, about the political events that have been unfolding in Madagascar and no more need be said.**
- The budget Table 1a 2, and all budget tables at the end of each component after this one, **need to have a breakdown** of what part of the proposed budget will be funded by FCPF, and what other sources of funding have been identified to meet the difference. This is important. If the funding has not been identified yet, there should be a narrative to explain what steps have been taken to find the money with other donors **There is now a breakdown, though in the main the role of the other potential donors has not yet be pinned down. Few other countries have been able to do very much better at this juncture, however.**

This standard is now 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.

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

Observations:

This component met the standard in October 2010. New material was added, prior to January 2013, to take account of the continuing communication and consultation process in the two intervening years. It was appropriate therefore, that it still met the standard in January 2013. We believe that it would still help the quality of the document to pay attention to the comments below, though we do not insist on it.

The R-PP reflects significant effort towards identifying key stakeholders, establishing early dialogue, and commencing national-scale information sharing and awareness for key relevant stakeholders. The 2012 workshop convened to finalize the R-PP for submission involved, among other groups, a civil society platform coordinated by Alliance Voahary Gasy, concerned with

ensuring good governance and legality across the environment, private and public sectors. This latest part of the process shows a commendable intent to work transparently at all stages, even though the actual numbers of people reached is small by comparison with some countries' efforts.

Given this commitment to open working methods, it is slightly surprising that there is not more mention of participation by women, youth groups and minorities, and in particular the representation and participation by indigenous peoples' groupings. This sets the Madagascar R-PP apart from that of other countries, most of which have gone to some lengths to ensure that an adequate voice is given to indigenous peoples. It would be **appropriate to say more both about indigenous peoples' groups and participation by women (and youth groups, too)** and to demonstrate better, how they will be involved in the process at all stages, not just in early consultations.

We note that the Alliance Voary Gasy is getting an increasing voice (since 2012, only), perhaps filling a void left by the weakened state institutions over recent years; this civil society initiative is in itself a good sign of improved sharing of responsibility for communications between the public sector and civil society. The Alliance has proved willing to make public a number of very sensitive issues in relation to the breaking of environmental laws and the abuse of powers. This is proving to be an extremely powerful voice for improved forest governance. Reviewers note that the R-PP is much more cautious about describing these abuses than the Alliance has been. Transparency is not as obvious as it has been in the R-PPs of a number of other countries.

Relatively little penetration into local communities has been achieved at this stage. What is not entirely clear is how the meetings handled the many divergent opinions that were expressed, nor what means were used to listen and react (the dialogue), as well as to inform (the information-sharing). In fact, most of the sensitization of local populations that has taken place in relation to REDD+ has been done by NGOs working in different areas of the country (not particularly related to the R-PP process); this has been an important part of the decentralization process and **mention should be made of this fact.**

A list of specific stakeholders/groups consulted at the national and local, regional and municipality levels through workshops and meetings should be added to the appropriate Annexe (1 (b) 5?) to reinforce general participation statistics provided, and hopefully, to confirm that forest-dependent rural communities have been sufficiently engaged in communication efforts during the process of R-PP development.

The R-PP expresses general commitment to transparency and accountability, and recommends emerging strategies such as a "green line" telecommunication system to convey information and collect feedback from the broader public including underrepresented groups (though reviewers feel that this possibility is virtually unknown at local level at the moment). The R-PP **should more clearly outline its formal strategy for analyzing diverse stakeholder feedback** for integration into future REDD+ decision-making.

Figure 1b-1 is illegible and this **needs to be dealt with.**

Mention is made on p.23 of the Vice premiership in charge of decentralization and land-use planning: in fact these have now been separated and lie elsewhere in the structure of government.

The Annexes (there are several) give the results of the 2010 consultations; **it would be reassuring to add the results of the 2012 consultations**, presumably as Annexe 1 (b) 6.

Recommendations:

None, since the standard was already met in 2010 and 2013

There have been quite a few modifications to the text of this component, largely in the form of reporting on recent changes in structures, committees and other actions taken by the Government in recent months. The changes do not, by and large, address the comments above, but these were purely advisory, since the standard had already been met.

Standard is 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 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.

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

Observations:

The consultation and participation process for R-PP development thus far is clearly articulated. Consultations at the regional level have reportedly been conducted in seven regions around Madagascar identified to represent high rates of deforestation and to represent all relevant ecosystem types on the island. Stakeholders from the agriculture, livestock, mining, energy, transport, and private sectors, as well as civil society groups, natural resource managers and forest-bordering communities are reported to have been consulted and their concerns documented. Approval by these stakeholders of activities, approaches, methodologies, principles and policy options for getting prepared for REDD+ was obtained in national workshops in 2010 and another in 2012. A role in this is defined for the civil society platform, with the Alliance Voahary Gasy taking a leading role: whether or not the Alliance has the capacity to do this nationwide is not yet clear.

The R-PP adequately represents the extent of ownership within the government and stakeholder community at the national and regional levels, although the extent of ownership at the local level, particularly within rural communities, is less well documented. Reviewers are generally

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).

rather doubtful about the degree of understanding by local communities of the implications for them of REDD+. They point out that for a high proportion of the rural population, illiteracy and a general fear of the Administration are strong inhibitory factors against adequate participation in the REDD+ process. Those reviewers most familiar with the situation on the ground in Madagascar, are concerned that much information has been imparted through a well-structured process, but that its implications are not widely understood. **It would be helpful if the R-PP could say more about this.**

The R-PP clearly represents concerns expressed and recommendations made by relevant stakeholders (at the national level, at least), and the process by which these were considered and addressed in readiness workshops. Appendix 1b-1 and 1b-2 clearly detail proceedings of consultations with diverse stakeholders at the national level in the workshops that were convened, elaborating on questions asked and answers provided. Annex 1b-5 summarizes discussion areas and answers provided in workshops in the seven regions that were targeted.

Recommendations:

- It is noted in the R-PP that women may have been underrepresented in regional-level stakeholder consultations. More ways of overcoming this barrier to engaging rural female stakeholders **should be included** in the R-PP. As in the previous component, there is inadequate attention given to indigenous peoples,. Absence of this has been a major obstacle in other FCPF countries, attracting widespread concerns. The history and demography of the occupation of the island is such that the term is slightly misleading in Madagascar anyway; but what is beyond contest is that there are small, ethnically identifiable groups living in and dependent on the forest, who are vulnerable in the extreme, and whose concerns need to be properly taken into account. **This entire topic needs to be more clearly described. A substantial new text has been written to describe how women and vulnerable groups will be included in numerous ways in the flow of information, in consultation and in planning of future activities in such a way as to take proper account at all times of their concerns. While the text is rather general, the authors have certainly responded as best they can at this stage, to the concerns expressed by the TAP.**
- More needs to be said about the subject matter of REDD+ and how it is to become central to the consultation and participation process. The numerous additions to the text of this section do touch on this issue, without specifically spelling it out.
- The R-PP should say more about the Alliance Voahary Gasy, which, as the recognized civil society Platform, has an obvious responsibility in the consultation and participation process. What the terms of reference are for their role should be better described as well as making it clear whether the budget will support their activities financially. **The authors clearly feel they have done this, since there are seven mentions of Voahary Gasy in sections 1b, 1c and 2b. There is not a specific response to this recommendation, though. This is not a serious omission.**
- The R-PP should be clearer about how the national REDD structures will treat the two-way flow of information. The document spells out the topics about which it expects to impart information, but is not clear how it will receive, handle and react to information it receives in reverse, notably from local communities and through the provincial commissions. **It goes to some lengths to describe a dialogue and a permanent flow of information. It is not at all specific in how this will be done, but the principle of listening as well as transmitting knowledge, now seems well anchored in the approach.**
- The Consultation and Participation Plan for the R-PP implementation phase is outlined in

Table 1c-3. In addition to noting principal activities, sub-activities, and budget lines for the three readiness years of the R-PP Consultation and Participation Plan, Table 1c-3 could usefully include a column that indicates the implementers and (where appropriate) stakeholder groups associated with each activity. A further point is that 90% of the proposed consultations are planned for the first year; this is unrealistic, since it will be necessary to keep on communicating as the programme evolves during the three years. This table and the planning of activities **need further work**, a consequence of which is likely to be a modest increase in the budget. **These points have now been dealt with, in a perfectly satisfactory way.**

The standard is now met

Component 2. Prepare the REDD-plus Strategy

Standard 2a: Assessment of Land Use, Land Use Change Drivers, 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 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:

Observations:

This component met the standard in October 2010 . By comparison with some other countries, it is a thorough and well organized presentation of the facts and has indeed been getting better with each revised submission of the R-PP. Nonetheless, our team of reviewers have plenty of comments for improving it further. It still met the standard in January 2013, so the comments below do not need to be attended to, though of course we think it would be to Madagascar's benefit, if they were.

Component 2a has been extensively revised and much new material added. It is an improvement over the previous version, and greatly assists in providing the background for policy decisions and the development of appropriate strategies.

Considerable effort has gone into summarizing the many studies and multitude of reports that have emerged from the \$400m investment by bilateral and multilateral donors over the past 20 years. This willingness to base the thinking about the future on the evidence gathered in the past, is a most welcome approach, and one missing from the R-PPs of many other countries. Nonetheless, the past can provide yet more useful experience and it is expected that a more critical look will be taken at some of these data, as this programme advances, to learn from the failures and disappointments as well as the successes.

It is also important to acknowledge, as the proposal does, that there are different drivers and great differences in the magnitude of drivers among the different regions and biomes (generally referred to as "ecosystems" in the proposal). An early and careful assessment and ranking of drivers in the areas where deforestation and degradation are most acute would be in order. Figure 2a-4 p 46 gives a good summary of the range of drivers that are operational in various places.

The R-PP identifies three major land use trends associated with persistent deforestation and degradation of Madagascar's forest systems: the conversion of forests for agriculture, their erosion

due to the impact of livestock-rearing and fuelwood harvesting, and legal and illegal mining. In fact, these issues are much more complicated than they are presented to be, and **further, clear thinking about this is needed**, in order to ensure that well-targeted strategies for dealing with these drivers are developed. This refers in particular to dissociating the direct and indirect causes of deforestation.

Poor governance and lack of enforcement capacity in relevant sectors are identified in their turn as major drivers of these land use changes. The analysis of successes and failures in the implementation of measures to address the causes of deforestation and degradation is pretty basic, even though good studies on these matters do exist. Root causes of these failures are not mentioned, particularly those linked to alternative pressures.

In its review of past and current systems of centralized forest governance and management, the R-PP provides a basic overview of major land tenure and natural resource rights challenges and relevant governance issues. It helpfully distinguishes between the official and traditional systems of tenure. There are currently two different systems, both legal, operating in parallel, with the old system of the granting of land title still the predominant one.

There is extensive experience in the classification of land and the causes of its degradation, that has been developed during the different phases of the internationally funded environment programmes of the last two decades; reviewers feel that not enough is made of the wealth of methodological and analytical detail that is to be found in this previous work.

Despite recent efforts to decentralize through participatory management programs, the R-PP explains that many challenges still persist. In Table 2a-3: “Lessons learned from different approaches to forest management”, the R-PP documents past successes and failures associated with measures to address drivers of deforestation and forest degradation. Establishing rural land offices and participatory land law reform in remote areas, as well as implementing regional development plans and regional forest zoning to reduce conflicts between sectors in forest areas, are identified as necessary tools for establishing local tenure and achieving REDD+ readiness.

Despite this description, there is still **scope for a more in-depth discussion of different land tenure systems in relevant regions around the island**, including an overview of existing legal frameworks and possible barriers to legal recognition of informal or customary systems of land tenure. It would be **helped by being presented graphically**: as would a presentation of the different strategies for forest governance being tried out and proposed in different parts of the country.

Attention needs to be given to the position of the management of forest resources in the National Land-Use Strategy and to ensuring that it is in conformity with the Regional Land-Use Strategies. They are mentioned, but the means by which they are linked is not and this is very important to REDD+.

The success and impact of different forest governance regimes is touched upon (p.47) but it would be a **great help to look a little more critically** at the existing evidence, to compare outcomes from land under delegated local management and nearby forest lands under the direct control of the Administration. Reduction in the rate of deforestation is reported from the former, but more detail would be a help.

Figure 2a-2: “Previous Studies on historical deforestation” should be revised such that orientations of study author/institution names for plotted data points more clearly represent which

author/institution is responsible for each set of data points. The map of deforestation (Figure 2a-3 is, unfortunately, out of focus and unintelligible.

Appendix 2a-2 “Ecosystem evolution by region for the 2000-2005 period (Source: ONE)” and “National level ecosystem change for the 2000-2005 period (Source: IEFN)” tables should be reformatted to avoid column overlap and to enable legibility of entries (Annex p 37-38).

References and bibliography generally, are inadequate and when they occur, lack necessary precision.

More thought needs to be given to the links between the different studies (on p.66) and the possibilities of economies of scale by joining some of them together. Not all the studies appear to be covered by the budget. But on the other hand, the cost of the National REDD Coordination Office described in Component 1a has increased enormously since the previous submission, and one wonders whether there is not a duplication between its costs, and those of the studies envisaged here.

Recommendations:

None, since the standard has already been met

No changes have been made to this component, nor were they necessary, since the standard has already been met (more than met: this is an exceptionally thorough and well-conceived analysis, of which the team of authors can be justly proud).

Meets the standard

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:

Observations:

The TAP review of October 2010 noted that the mainstreaming of REDD+ in the country’s overall development framework should be considered as an important component of the REDD+ strategy. TAP also stated that since most of Madagascar’s deforestation comes from slash and burn agriculture, the local people’s needs and aspirations need to be sufficiently taken into account. In addition, the review stated that the means for bringing on board local people was not

sufficiently described.

This present proposal shows a welcome effort to switch the strategic attention away from being purely oriented on the forest itself. Nonetheless, our review team is united in believing that the strategic approach needs to be even more focused on agriculture and agricultural practices, if REDD is to make progress in Madagascar. At present there are four strategic options explored, but we feel that they do not go to the heart of the root causes of deforestation that were exposed in section 2a.

The revised proposal rightly identifies governance failure due both to lack of capacity and, to some extent to instability and fragility of national government leadership: these constitute a key crosscutting driver of deforestation. The programme needs to find ways to buffer against that risk. This may be in the form of greater emphasis on local or perhaps in some regions provincial authorities as well as establishing sound programme ownership within local communities. There may be some good lessons emerging from the pilot REDD projects that could have broader application.

While there is wide discussion of the range of drivers in the proposal there is little discussion of a plan to do economic analysis - cost-benefit or otherwise - during R-PP implementation. There is strong recognition of the environmental values (biodiversity in particular but also water and forest resources) that could benefit from a well-designed and implemented national REDD+ strategy.

As far as addressing the drivers, the main approach at this stage is to develop a plan for more sophisticated and focused analytical work. That is fine and undoubtedly necessary, but in many areas (like where all of these pilot projects are located) the causes of deforestation are relatively obvious and well known.

The proposal expresses the aspiration that REDD will provide more stable and long term funding for alternative less environmentally destructive livelihoods, but it is going to have to demonstrate that through solidly designed and “justified” local actions.

Other than the creation of the large multi-sectoral committee, there is little acknowledgement, and even less discussion of how the REDD+ strategy will dovetail with the national development agenda, agricultural policies, etc. This rather suggests that those from other sectors who are responsible for major areas of policy relevant to REDD+, did not participate enough in the design process that led to the writing of this document. More broad exploration into these instruments would have produced a better informed document at this stage. Just as an example, there is no mention even of the Biodiversity Strategy and Action Plan that has been under development although the potential overlap and necessity for cross linkage among the road maps for implementing 2 “Rio” conventions should be obvious.

The R-PP outlines a five-step process over three years for REDD+ Strategy formulation at national and regional levels. Four strategic policy options for REDD + are outlined in the R-PP as the basis for developing a national REDD + strategy, which include:

- improving the overall policy framework of the forest sector Policy option 1 does include more integration of REDD+ into other key sectors such as agriculture, livestock, and mining, and sub-option 1.3 focuses on the issue of integration. This has to be given greater prominence, since it is our view that the problems that are driving D & D are as much a question of agriculture and land-use practices permitted, or at least not proscribed, under other sectors’ laws than forestry.
- creating incentives for the sustainable management and efficient use of forest resources. Not enough thought is given, however, to approaches such as PES;
- strengthening monitoring and control and forest law enforcement (not enough is made of the possibility of improving the monitoring of corruption); and
- developing alternatives to deforestation and degradation of forest resources. Policy option 4 focuses on developing alternatives to deforestation and degradation of forest resources, and mentions slash and burn techniques, in particular for rice-production. Much of this is at

the very heart of Madagascar's land-use challenge, and the challenge of implementing REDD+, but it is not as deeply discussed as could have been hoped. If not addressed head-on, REDD+ will not make much headway in arresting forest loss in Madagascar. There is a paragraph, not enough, on support for local community development .

The TAP reviewers have a general feeling that the process that has produced this R-PP has focused more on the means and methods for implementing the strategy, than the intended results of it. And even so, the assumptions underlying these methods are not thoroughly examined. Also, the strategy options are still very focused on forests, and restoring their integrity, rather than tackling the causes of deforestation that are at the heart of the problem. We recognize that this present submission reflects further thinking on this, but we still feel that it has not gone far enough.

Agriculture itself, and mining, seem peripheral to the strategy options, rather than at their centre. The reviewers are concerned that the measures proposed will not adequately tackle the problems. A final, general point about the strategy options is that they sidestep the issues of indigenous peoples, disadvantaged groups such as women, and the articulation with rural households more generally.

The R-PP evaluates six pilot REDD projects currently in-place in Madagascar as existing strategies: Makira (VCS Verified with a system of revenue-sharing that serves as an example for other initiatives), CAZ, PHCF, FORECA, AfD-ONE, and a combined ecoregional pilot (joint-initiative launched with funding from World Bank to develop a reference scenario as the first step in a nested approach to REDD+). We would have expected these pilot projects to have provided more answers, that might have sharpened up the policy options; but perhaps they paint an inconclusive picture at the moment.

Madagascar is a country with a large extent of mangroves and the carbon sequestered by these formations is very stable. Blue carbon is a great opportunity for the country, and mangrove conservation is in line with ICZM policy. Mangrove protection is not among the REDD+ options. More thought should be given to this.

Recommendations:

- **There needs to be a fuller treatment** of how it is proposed not only to document leakages, but also how to reduce them, during the readiness preparation phase. **This has not really been done here, but there is a good treatment of the topic in Component 4a, so it does not matter if it is missing here.**
- A general analysis of strengths and weaknesses of each system is included as a basis for assessing these various REDD+ strategy options. The R-PP calls for analytic studies (ToR for these studies included in Appendix 2a-5), including a vertical and spatial analysis of causes of deforestation and degradation, as well as determination of areas of intervention in the short- and medium-terms. **The step-by-step process that is outlined, for testing and evaluating the merits of the different strategy options, has been well done (though is in fact unchanged from the previous submission)**
- The R-PP should provide a basic analysis of the challenges and benefits associated with each of the four strategic policy options outlined for REDD+, as well as a plan to do more detailed analysis of the challenges and benefits of the political and institutional feasibility of the emerging REDD+ strategy, during implementation. **In point of fact, there is a good analytical table assessing the challenges and benefits associated with each of**

the strategy options. This has not been changed, but the analysis in the previous version was in fact quite logical.

- The options need to be given a sense of priority, with some idea of which are going to bring the biggest gains, the greatest rewards. This has not been done in this way, though the process of evaluation of the options is in fact clearly described.
- The R-PP should present a more strategic stepwise plan for how it proposes to address and overcome deforestation and degradation drivers in the design of its REDD+ strategy. Particularly, a clearer plan should be communicated for overcoming opportunity costs to rural communities of foregoing fire-associated agricultural production systems (of rice in particular) and fuelwood collection/charcoal production in managed forest stocks. This has not been done.

This component is in fact very thoroughly and logically treated, and for that reason it deserves to be elevated to “largely met”. What prevents it still from meeting the standard is that the analysis in component 2a clearly points the finger at anarchic agricultural practices, as being the main cause of forest degradation and deforestation in Madagascar. Yet of the four strategy options which are outlined, only the fourth is concerned with rural households and agricultural practice. The first three are more conventional attempts to improve the fitness of the forest sector to meet the challenges of a future REDD+ regime: not bad objectives in themselves, but not addressing the fundamental problem. For this reason, we feel we cannot go the final step in the assessment of this component.

Standard is 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:

Observations:

The standard was met in October 2010 and again in January 2013. We cannot reverse this judgement and do not propose to do so, so once again, the standard is still met for component 2c. The suggested changes we have made below would improve the document, but we do not insist on them

The proposal provides a good overview of the challenges associated with establishing individual land rights and acknowledges the considerable work to be done to harmonize the large number of policy, legislative and regulatory instruments (most very weakly implemented or enforced) that Madagascar has on the books. It also acknowledges the problem of overlapping allocation of mining, drilling and sometimes timber rights that plague the current system of protected areas.

Tables 2c-1 and 2c-2 present a summary of activities and a general work plan and budget for institutional arrangements and issues relevant to REDD+ in Madagascar over three years. It would

be helpful if the agencies, organizations and actors engaged in each activity were listed. The R-PP acknowledges that Madagascar currently lacks clear capacity to legislate carbon rights, customary land rights and tenure issues, and that these priorities will require resolution to enable implementation.

The description of the grievance and conflict resolution mechanisms are so short of detail as to be rather unconvincing. More information about who would do what and under what authority, would be a help.

Relevant studies are proposed to further define needs and propose strategies for overcoming these. Annex 2c-1 outlines proposed studies for necessary institutional and legislative reforms in Madagascar. In Appendix 2c-2, the R-PP outlines systems applied to-date for the transfer of payments to management and stakeholders in Madagascar National Parks DEAP, Makira (WCS), Foundation TANY MEVA, and FORECA projects, presenting these as possible models for institutional arrangements to engage and track REDD+ activities and transactions.

In addition to recommending relevant studies, the R-PP **should more clearly explore** how the State and judiciary in Madagascar might build **capacity for formal delegation of carbon rights**, as well as prioritizing transference of customary rights to formal rights where appropriate. No reference is made to the existing work already available, on carbon rights in Madagascar. Nothing is said about a transitional phase in which, on a project-by-project basis, formal arrangements for benefit sharing of carbon might be made, while waiting for the law to catch up. This could be an important confidence-building measure. There is already at least one study in Madagascar, showing the way for this.

The R-PP **should include** in one of its proposed studies how **carbon investments** in areas under different management regimes such as community managed forests and co-management arrangements, might be considered.

Another financial management issue is that the management of **revenues from transactions must be separated** from the management of funds for REDD implementation (management of a pilot project in a protected area, for example).

During R-PP implementation, Madagascar has to **design its carbon registry system** (not only for REDD, but also for all carbon credit transactions). The system must be aligned to international standards. Thus a special study is necessary for identify an appropriate institution which will host the carbon registry, and to set it up (this has recently been done, most effectively, as part of the REDD+-readiness work in DRC).

The R-PP **would benefit from a more extensive comparative analysis** of advantages and disadvantages and costs and benefits associated with each existing system of sharing of revenues and transfer of payments to management and stakeholders, presented as models for institutional arrangements to engage and track REDD+ activities and transactions. Hence a work plan for carrying this out is recommended for inclusion in the R-PP. It is necessary to distinguish between carbon ownership, and the right to benefit from the revenues from carbon transaction. On p.86 it is implied that the legislation on this will be reformed: but there is no relevant legislation to reform. It has to start from scratch.

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Recommendations:

None, since the standard was already met in previous submissions

No changes were made to this component, nor was it essential to respond to the suggestions made above, since the standard had already been met.

Standard is 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 recommendations:

Observations:

The standard was met in October 2010 and again in January 2013. We cannot reverse this judgement and do not propose to do so, so once again, the standard is met for component 2d. The suggested changes we have made below would improve the document, but we do not insist on them.

This R-PP includes a detailed description of commitment to the development of a Strategic Environmental and Social Assessment tool (SESA/EESS) for assessing environmental and social risks and impacts associated with REDD+. Table 2d-3 outlines a summary of activities and budget for the SESA process. A simple work plan is proposed which would involve the Ministry of Environment and Forests (MEF), National Office for the Environment (ONE), World Bank, and relevant consultants. Roles of stakeholders are considered to ensure public participation and consultation in a strategy informed by Madagascar's existing regulatory framework on public participation in the process of environmental impact assessments. Reference is made to World Bank safeguards as guiding this work.

The Ministry of Environment is proposed to have a dual role here, since it is both the arm of government responsible for launching a SESA (through ONE) as well as being the host of the REDD+ Secretariat. Such an arrangement has been proposed in other countries, too. It is also stated in different places that both the BCN and the Ministry will commission and supervise the work of consultants in undertaking SESA work. This needs to be clarified. There is now a long history of the production of EESS/SESA studies in Madagascar, in particular in relation to programmes financed by the World Bank, and yet the **methods and protocols**, already well documented, do not seem to have been fully absorbed in the R-PP. More needs to be said about the development of an Environmental and Social Management Framework

It is **not clear how local communities will be involved** and empowered to contribute to any SESA process. This should be clarified.

It is **not clear** either, how the application of SESA to components of the programme, would be used to provide **feedback that would modify the programme**. Yet there is an established process for the preparation of a REDD+ SESA, with readily available flowcharts, that describes how such feedback can be incorporated. Another aspect requiring clarification is of which institution would supervise the SESA process. If it is to be ONE, as already established by law and precedent, this should at least be said.

Recommendations:

None, since the standard has already been met.

No changes were made to this component, nor was it essential to respond to the suggestions made above, since the standard had already been met.

Standard is 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:

Observations:

The standard was largely met in October 2010 and progressed to being fully met in January 2013. We would advise that the comments in bold, below, be taken into account in the revision of the R-PP over the next few weeks, since a number of them will really help the future planning of the work

The latest R-PP expands on the earlier versions in this component. On the whole the plan appears to be reasonable, and most of the issues have been addressed. This section displays a broad and comprehensive knowledge of relevant literature and methodologies for carbon stock estimates deployed within Madagascar and elsewhere. The work plan displayed in Table 3-8 (p. 121) provides the major elements and actions to be followed in developing a reference scenario, though it does not specify in detail which of the methodologies discussed will be used.

The historical deforestation will be established by use of Landsat satellite images, referring to three dates over the last ten years - and minimum of 2 years between the dates - covering the whole country. In addition, high resolution images (like SPOT) will be used for control areas. For the baseline, predictive models will be developed based on socio-economic data related to causes and drivers of deforestation, and the historical deforestation level. These models will be based on ecological regions. These stages rely on the currently available capacity and experiences gained from current pilot projects.

Two options are mentioned for measuring forest degradation: direct measurement through appropriate satellite imagery for vegetation analysis and field measurement (ground truth) through a network of observation sites. Specific references are provided on currently available data and accurate allometric equations. In addition, the available capacity, data requirements and capacity building requirements are described. It is also expected that data collected and analysis of results will feed the evolving REDD+ strategy development process.

Given that there is still active debate and discussion within the UNFCCC and linked bodies like SBST and IPCC it is probably wise to remain “flexible” in the choice of methodologies at this stage. The decision to take a “no regrets” approach to data acquisition at this stage seems reasonable given these uncertainties.

We agree that it is unrealistic to achieve a Tier II approach with belowground biomass, but also note that it is probably unrealistic to achieve a Tier III approach with the mapping of national carbon stocks. Starting with Tier II here, with the ultimate goal of Tier III, is probably the best approach.

The future reference level will depend on projected activity, but there is not much detail about future projections here: these will need to be added as the program develops.

It is indicated that throughout this period, 5 studies will be commissioned to confirm best policies for implementing strategies for inter-sectoral collaboration, spatial monitoring, forest carbon ownership, allocation of funds for REDD+ implementation, and revenue-sharing. Regular and affordable access to high-resolution imagery and lack of historical trend data are identified in the R-PP as significant challenges in the detection and monitoring of degradation and forest cover change on the island. The R-PP provides a workplan and budget in Table 3-8 for a system of determining reference levels by ecoregion, including funding of forest inventories and training of rural COBAs. The R-PP reports that domestic offices are currently undergoing capacity building to enable measurement and analysis of biomass and soil carbon stocks. A national workshop on the establishment of a national reference level and deployment system for MRV was reportedly held in 2011 in Madagascar, and a technical group GT-REL/MRV/SIS has been assembled under the coordination of BCN-REDD+.

One thing that is missing is a clear exposé of the different institutions that will be involved in all of this work, and the range of responsibilities that each would be expected to carry. **This needs to be remedied.** So, too, is the fact that a very wide range of institutions, national and international, already hold data sets that will be essential to this work. The R-PP should say something about **the need to make those agencies want to share their data** with the BCN REDD, and the need to establish a **framework agreement for data sharing**.

Maps included in the R-PP for current vegetative cover extent and historical change are limited in that they represent data only up to the year 2005. **It is important that the R-PP acknowledge** estimated deforestation and forest degradation in the period of political instability/relaxed governance in recent years, as well as describe any anticipated future land use changes such as any known concessions granted by the government for mining or other uses.

Verification by an external expert of estimates presented in the R-PP in Table 3-3 (2012 ONE et DGF inventory) for carbon stocks in aboveground biomass in different vegetation types on the island, is recommended.

The R-PP should provide **more detailed descriptions for the studies proposed to build capacity** for the development of a domestic carbon accounting system by the third year of the readiness plan.

It would be helpful, too, to provide some information on the projects already under way, some of which are approaching their end, which will have accumulated data, experience and advice that

will be very helpful during R-PP implementation.

In component 4b, a study is scheduled for the definition of a conservation baseline. However, many studies were carried out during the identification of key biodiversity areas, for protected area expansion. Shortfalls and gaps in these studies are not mentioned, as justification for a new study for establishing a conservation baseline.

The work plan and the associated budget do not give a clear picture of the interrelatedness of these successive stages of data gathering and analysis: **it would be very helpful (to Madagascar, as well as to readers) to spell this out with more precision.**

The budget table, and associated text, should really say what parts of this are already financed by, or will be **financed by the support from AFD and the PE3 programme.**

Recommendations:

None, since the standard has already been met.

No changes were made to this component, nor was it essential to respond to the suggestions made above, since the standard had already been met.

Standard is 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.

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

Observations:

The standard for component 4a was met in the January 2013 submission, though we would nevertheless recommend attending to the comments in bold below, including the development of an outcome chain to help guide the MRV development.

This component was substantially rewritten for the January 2013 submission, and is almost twice as long as the original version. With the expanded material, most of the requirements for this component were indeed met. A participatory and stepwise system of national monitoring, reporting and verification will be piloted by the GT-REL/MRV/SIS technical group, which will ensure methodological consistency between the national Reference Level system and system for MRV. A nested approach to monitoring is described, with national level monitoring complemented by data collection at the REDD+ project-level. The replicable system proposed would include internal validation as well as validation by independent third parties such as UNFCCC and VCS. The R-PP explains that a geoportal/website will be developed for information-sharing on REDD+ monitoring in Madagascar.

The R-PP **should more clearly identify** which entity/entities will host and maintain this geoportal/website and how it will promote stakeholder access to information. This is referred to again below. The type of platform for the geoportal deserves some comment, even if a decision is not necessary at this stage (for example the terraAmazon platform is already freely available). A data-gathering and management exercise of this scale could be very useful beyond the limits of REDD+ MRV work (in monitoring land-use and its change, for example, at different spatial levels), and this is worthy of mention. The architecture of national forest monitoring is described in the proposal. It includes monitoring of forest cover by the use of high-resolution images, and monitoring of degradation of forests by the network of observers. Community participation in monitoring is described in the document, from simple dendrometric measurements to monitoring of carbon stock changes. Monitoring tools will be developed for communities.

Surprisingly, there is no mention in this component, nor in component 3, previously, of a role for the Madagascar Cartographic Institute (FTM). **This omission should either be rectified, or adequately explained.**

Appendix 3-1 of the R-PP gives an overview of the SEAS-OI Project (Satellite-Aided Environmental Monitoring in the Indian Ocean) responsible for remote sensing and management of territories in the southwest Indian Ocean, which will provide a platform for image processing, dynamic mapping of land use, and technical support for monitoring resource management.

The authors have adopted a stepwise approach, as recommended in the earlier TAP review. There is a good analysis of the different kinds of satellite data available, although in the budget, funds are only provided in year 3 for satellite data acquisition (access to Landsat and Sentinel images being free).

The TBE and TBS dashboards for monitoring large amounts of different kinds of information are interesting and useful ways to organize and present data. This could be a useful model for other countries. Creation of a database, to include demographic, social and environmental data and indicators as described on p 128 is a desirable element. One thing which remains unclear is just **which institution is going to be responsible for the substantial job of data management?** This is not just a technical challenge, but quite a diplomatic one, since it is a fact that institutions, projects, agencies are all of them likely to be jealous of the data that they have accumulated, and may have neither the resources nor the inclination to devote to getting their data into a format suitable for sharing. The capacity of the ONE in this regard should be referred to. This is a nettle to be grasped, however, and the editorial team of the R-PP should say something about how it proposes to go about this. There is an element of international obligation attending this (under the Kyoto protocol, for example).

The analysis showing which Tier and Approach will be used is reasonable, starting with Tier I and eventually moving to Tier 3, with an early commitment to Approach 3. The intention to begin with an objective of IPCC Tier II level precision and moving up to Tier II when data, tools and methodologies make that cost effective is a prudent approach. (See Table 4a-3 p 127 for details)

There is not much information on permanent plots, and it would be **good to be told where these should be installed** to monitor the remaining forest biomes. There is also not much in the way of scenarios for how MRV would be used - these would be useful in helping to set priorities for the work plan. The R-PP describes local-level data collection and verification via participatory monitoring of forest areas, modeled after systems applied in the Makira area. The R-PP should further **elaborate on the recommended system for compensating local monitoring teams** for time and resources invested. The R-PP should also more clearly **outline a plan for engaging and training rural COBAs** in forest regions not covered by existing project management arrangements, to ensure standardization of data aggregated at the national level.

The emphasis on institutional capacity building is both good and relevant, though how this will be achieved **could be more clearly indicated**. The description of how national capacity could be developed and enhanced in terms of remote sensing data collection and analysis is good as far as it goes but it still leaves open the question of what systems for data acquisition (and processing) will be used.

The work plan as presented is a fairly simple list of items - it would be better, as the plan develops, to **have a true outcome chain** as noted in Component 3, that shows how some elements of the plan will proceed independently, and some will depend on others. Good examples of such outcome chains have been presented in the Ethiopia and Kenya R-PPs, available in the FCPF website.

The R-PP indicates that regional monitoring systems might rely on an early warning system for bush and forest fires through national scale analysis of satellite imagery modeled after a service generated by Conservation International for other countries. In such a system, local leaders would be informed and consulted on how to proceed. The R-PP should **clearly describe a mechanism** for ensuring measured and appropriate local enforcement responses will result from such an early warning system.

Recommendations:

None, since the standard has already been met.

No major changes were made to this component (other than clarifying the role of ONE), nor was it essential to respond to the suggestions made above, since the standard had already been met.

Standard is 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:

Observations:

The R-PP identifies multiple non-carbon benefits associated with REDD in Madagascar, including watershed protection, non-timber forest products, biodiversity benefits, and enhanced governance, and acknowledges the importance of monitoring and evaluation of these benefits. Important cultural benefits are also foreseen, as REDD sustains resource bases for rural livelihoods and endemic biodiversity. The emphasis on “locally relevant” monitoring on the socio-economic status of human populations and the ecological integrity of natural environments is relevant and appropriate.

The R-PP presents an Information System on Safeguards (SIS) to be responsible for designing and ensuring respect for social and environmental safeguards. Monitoring of “factors contributing to deforestation/degradation, multiple benefits, other impacts, governance and guarantees” is integrated into the Table 4b-1 “Summary of activities and budget for MRV” (R-PP p136). The R-PP talks of monitoring forest governance, but does not mention the forest governance review of 2012; this was already a complex enough exercise, which surely can serve as a baseline for the R-PP implementation and does not need repeating. **This therefore needs a bit of further explanation.** The proposal to monitor corruption as a part of the forest governance work is to be commended.

Recommendations:

- The authors should **explore the potential for cross linkage with monitoring of biodiversity** that may be under way or contemplated under the updated Biodiversity Strategy and Action Plan. Also experience from some of the pilots being developed by NGOs with a strong biodiversity focus, particularly those working in and around protected areas, **needs to be worked into this plan.** But the R-PP should recognize that the design and implementation of any monitoring system that is capable of producing data of sufficient precision that they can be used to detect change of any kind, is a major undertaking in itself. Consideration should be given to **how these additional elements will be incorporated in the MRV** and how the data quality will be controlled. **This has not been precisely done, but the revised text draws attention to work within protected areas, so it is probably not a big issue.**
- In view of the complexity of such a monitoring system and the number of institutions that would need to be involved to encompass all that is to be monitored, the R-PP **should prepare a table** or some other indication of the organizations that would be involved, what types of data they would be collecting and how they would be coordinated (by which institution?). The participation of INSTAT in this process should be considered and mentioned.. **This has not been done, but there are indications now mentioned, of a great deal of cross-institutional collaboration, which makes it all but certain that it would quickly be done during implementation. The budget and workplan contain a lot more information about this, which is welcomed.**
- While a budget is included over three years for participatory rural monitoring in-line with SIS, capacity for effectively monitoring multiple associated benefits may present a real challenge and should be carefully considered. The French Development Agency (AFD) has already earmarked technical assistance to both ONE and DGF. The budgetary support secured for MRV and SIS is already above US \$1million. **Some more details are provided about the activities supported by the French programme.**
- This section of the R-PP would benefit from a more extensive **description of the process**

by which additional benefits would be generated, how they would be valued, and an analysis of their relative importance. **This was not done.**

- Madagascar is already participating in the World Bank-initiated WAVES programme (Wealth Accounting and Valuation of Ecosystem Services), an approach to national (and natural) wealth accounting, with a particular emphasis on the value of ecosystem services. This is obviously of great interest to any REDD+ programme and **should be mentioned** as a point of linkage. **The WAVES programme is now mentioned, if fleetingly.**
- More thought should be given to the huge challenge of developing indicators for such a monitoring system; all the more daunting because of the numbers of topics to be monitored, by a wide range of institutions with very different approaches to data and its management. **This has not been done.**

Although many of the recommendations have not been followed up, some of them have been, and there is little doubt that, on careful reading of the expectations of the standard, the standard has been met.

Meets the standard

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:

Observations:

Although the budget presentation seems detailed and well thought out in terms of the activities and their timing, care needs to be taken to ensure that the same information is presented here as is summarized at the foot of each previous component.

We note that the budget has increased, since October 2010, and indeed we have made recommendations earlier that would increase it still further. We have no particular objection to this, since the overall sum of money sought is not extreme, by comparison with other countries and in the light of the size and logistical complexity of Madagascar.

The TAP team has noted that the budget has increased since January 2013: it would be helpful to draw attention to why this is, and where it is intended to invest the additional resources requested. Some budget lines have increased considerably (the operating costs of the BCN-REDD, for example) and it would be reassuring to understand why this is and how it is justified.

Recommendations:

- The major shortcoming of this budget is that there is, as is to be expected, a substantial funding gap, but no indication as to how this should be filled. The Madagascar team **needs**

to add rows at the foot of each component of the budget, indicating what part of the FCPF grant would be attributed to each component, and which potential donors might fill that gap, or already have programmes in place that would do so. This same information should have been presented in the budget tables at the end of each component. Although this has been attempted, it needs to be very thoroughly done. **Much of what has been asked for, has now been done here, so that the attribution of the FCPF monies is clearly spelt out, and the contribution of other donors has been indicated. What is not made clear is whether the money sought from other donors has been identified, negotiated, promised or what. It is therefore not possible to judge what degree of risk there is, in embarking on a partially-funded enterprise of this scale. The activity tables and associated three-year budgets are quite thoroughly presented, and now seem generally welllinked to the activities described in the text of each component.**

- There should be a **narrative to accompany this**, which describes the financial support that already exists from other donors, or which is in the pipeline and which could reasonably be expected to fill the gap. For example, substantial support is currently being provided by the Agence Francaise de Developpement, but this is neither mentioned nor quantified. A few sentences are required to explain more broadly what strategy is in place for filling this funding gap, so that the FCPF can be reassured that its potential support will be deployed with enough support from other sources to make the programme as a whole a viable one. Some of the components seem seriously underfunded, and thought should be given to this in building the overall picture. **The narrative outlining the fundraising strategy has not been provided n or, as we mentioned in the previous comment, is the status of other donor participation described.**
- The whole area of pilot projects, relating to component 2b, is also absent from this component. At some stages in the text in previous components, mention is made of specific items that would need to be funded (a satellite data-capture system at the University of Antananarivo, for example), yet these gaps are not mentioned again in this chapter, which is misleading. **This is unchanged**
- There needs to be consistency between the budgets and activity plans at the end of each component, and the cumulative table presented in Component 5. **As far as we can tell, this is now resolved, though the FMT will no doubt need to examine this carefully.**
- There needs to be certainty and consistency about the duration of the grant that is requested. We would favour the realistic period of three years, which has proved to be perfectly suitable for other FCPF countries. **This has been clarified and made consistent throughout.**
- In order to meet this standard, which is not complicated, just requiring meticulous attention to detail, we would suggest that it could be done by two people, with nothing else to do for two days, going carefully through the whole proposal, and reconciling, checking, verifying, consulting others and seeking confirmation.

The work-planning component of this is good and thorough, and the attribution of costs to activities appears to have been given very careful attention. What is still missing is the reassurance needed that there are other potential funding sources that will make this (modestly-priced) proposal a feasible one. Half the money needed will, PC-willing, come from FCPF, but we have still not been told where the shortfall will come from. This prevents the standard from eing met, but it is the sort of issue that could easily be dealt with in discussion and negotiation over the coming months.

Standard is largely 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.

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

Observations:

The standard was already met in October 2010 and again in January 2013. The comments below are therefore for information only. If the Madagascar team is inclined to take them into account, so much the better

The document provides a clear and comprehensive outline of the framework for monitoring and evaluation. The table of expected results, Indicators and means of verification is clear, relevant and useful. A general description of indicators for performance monitoring is provided in Table 35 of the R-PP. In general, this M&E framework is better developed than those of most other countries' R-PPs.

It would be helpful to show how the framework of indicators for performance monitoring provided in Table 35 will facilitate transparent management of financial resources as the activity schedule is met.

Certain performance indicators outlined are vague and the R-PP would **benefit from further detail**. For example, the indicator "Legal basis for the strategy approved: Various laws on REDD + identified and developed (progressive adoption)" (R-PP p149) should add more detail on specific legislation markers necessary for moving beyond the readiness phase to REDD+ implementation.

It is proposed to base the M&E system entirely on the Logical Framework, which limits it therefore to the quality of the LogFrame, and does not take account of the classic performance measures of pertinence, efficiency, effectiveness and sustainability. These could **usefully be mentioned**.

It would be helpful to describe what corrective measures would be taken, when the performance of the project runs into difficulties, either technical or of timing.

It would also be wise to propose a broader, well-attended project planning workshop, that would more precisely design the monitoring framework, and would give the attention of people from many disciplines to the taxing issue of identifying realistic indicators, both of performance and of impact.

Recommendations:

There are none, since the standard was already met previously.

No changes have been made to this component; the advisory notes above have not been followed, but there was no requirement that they should, since the standard has already been met.

Standard is met.