

Forest Carbon Partnership Facility (FCPF)

Technical Assessment of the Advanced Draft ER-PD-Indonesia

I General Approach of the Review

The Draft ER-PD of Indonesia was delivered to the TAP on July 16. The first comments of the desk review were delivered to the Focal Point representing the Forest Carbon Partnership Facility (FCPF/World Bank) for Indonesia on July 31, to adjust the agenda for the country visit. The first comments contained the most important observations of the TAP in relation to the major strengths and non-conformities of the Draft ER-PD. In the preliminary report, the TAP also indicated where the information was incomplete and which persons or institutions the TAP would like to interview or visit. During the country visit the main observations of the TAP regarding the ER-PD were discussed with the Indonesian authorities and stakeholders. At the end of the country visit the main outcome of the TAP assessment was presented and a scheme was developed of how to proceed with the second Draft and final version. At the end of the country visit the TAP report regarding the Draft ER-PD was compiled and delivered to the focal point of the FCPF for Indonesia on August 16, 2018. On Sept 4, 2018 the Advanced Draft was made available to the TAP team, which is the basis of this report. The TAP report was delivered to the focal point on September 14 and on September 19 the TAP received comments from the FMT to clarify the text of some parts, which are all incorporated in the current version of the TAP report.

PART 1 OF TECHNICAL ASSESSMENT: Summary

<p>Date of Current Assessment: September 26, 2018. ER-PD version August 31, 2018</p> <p>Name of Assessment team members:</p> <table border="1"> <thead> <tr> <th>Person</th> <th>TAP expertise</th> <th>Criteria and indicators</th> </tr> </thead> <tbody> <tr> <td>Agustin Inthamoussu</td> <td>Carbon accounting expert</td> <td>10 – 22</td> </tr> <tr> <td>Ben de Jong</td> <td>Leader</td> <td>3 - 6; 23, 27.1-27.2</td> </tr> <tr> <td>Dodik Ridho Nurrochmat</td> <td>Local expert</td> <td>Contribute to 27.1, 27.2, 28.1</td> </tr> <tr> <td>Mario Nanclares</td> <td>Social and environmental safeguards expert</td> <td>24-26.3, 29, 30.1, 31.1-32.1, 34.1-35.1</td> </tr> <tr> <td>Moritz von Unger</td> <td>Legal expert</td> <td>28.1-28.3, 33.1 and 36.1-36.3, 37.1-38.4</td> </tr> <tr> <td>Pontus Olofsson</td> <td>Remote Sensing expert</td> <td>7 - 9</td> </tr> </tbody> </table>					Person	TAP expertise	Criteria and indicators	Agustin Inthamoussu	Carbon accounting expert	10 – 22	Ben de Jong	Leader	3 - 6; 23, 27.1-27.2	Dodik Ridho Nurrochmat	Local expert	Contribute to 27.1, 27.2, 28.1	Mario Nanclares	Social and environmental safeguards expert	24-26.3, 29, 30.1, 31.1-32.1, 34.1-35.1	Moritz von Unger	Legal expert	28.1-28.3, 33.1 and 36.1-36.3, 37.1-38.4	Pontus Olofsson	Remote Sensing expert	7 - 9
Person	TAP expertise	Criteria and indicators																							
Agustin Inthamoussu	Carbon accounting expert	10 – 22																							
Ben de Jong	Leader	3 - 6; 23, 27.1-27.2																							
Dodik Ridho Nurrochmat	Local expert	Contribute to 27.1, 27.2, 28.1																							
Mario Nanclares	Social and environmental safeguards expert	24-26.3, 29, 30.1, 31.1-32.1, 34.1-35.1																							
Moritz von Unger	Legal expert	28.1-28.3, 33.1 and 36.1-36.3, 37.1-38.4																							
Pontus Olofsson	Remote Sensing expert	7 - 9																							
<p>Summary Assessment of the Quality and Completeness of the ER-PD:</p> <p>The Indonesian government has done a very good effort to develop a solid ER-PD. It focuses on one of the key islands, where deforestation and forest degradation is a serious issue and where most of the key drivers that trigger deforestation and forest degradation in Indonesia are present. The proposal is of special interest as it intends to develop a</p>		Indicators	Initial review	1st Assessment	2nd assessment (final)																				

<p>cover class where the forest was converted to. In the Draft ER-PD, the estimation of emission factors did not take into account the amount of carbon that present in the non-forest land cover to where forests are converted to, but this has been corrected in the Advanced Draft. However, the literature sources of the carbon estimations in non-forest are not presented, nor their level of uncertainty in each non-forest land cover type. Also the aggregation procedure to estimate the average C-density of non-forest is not explained. No data were available to test the assumption that biomass densities of the 6 forest types in East Kalimantan do or do not differ significantly from the national biomass data, in order to justify the TIER 2 approach, particularly for the secondary forest types.</p> <p>III (b) Uncertainties → Criteria 7 – 9</p> <p>Sources of uncertainties that are not taken into consideration include the uncertainty (confidence intervals) of all the classes of land cover change over time (as mentioned above), the uncertainty related to the emission factors of non-forest classes, including the uncertainty related to aggregating these classes to estimate the average non-forest emission factor or carbon density. It is also not clear if the same non-forest carbon density was used for all deforestation classes, or different aggregation procedures were used, depending on the areas of the non-forest classes that are derived from one of the six forest types (primary and secondary dryland, mangrove, and swamp forest). The estimation of uncertainty related to the different classes in the land cover maps, presented in annex 12.1 and 12.3, has errors in the formulas and the results are not applied correctly in the estimations of uncertainty in each land cover class (see e.g. Olofsson (2014). The estimation of degraded forest, for example, has a much higher user and producer error than primary forest or non-forest (see table in annex 12.1), which should be reflected in a higher uncertainty of area estimations of the secondary forest cover classes. Currently uncertainty in the land cover classes are all estimated at 28%, which is derived from the overall map accuracy (calculated in annex 12.1). Likewise, these uncertainties are not the same as the uncertainties that need to be taken into account for the activity data, which are related to land cover change classes (in the case of Indonesia deforestation and forest degradation of the six forest types).</p> <p>The probability of double counting emissions from the various drivers of degradation is not taken into account (e.g. data of degradation due to timber extraction comes from statistics, not from maps). The lack of uncertainties in the land cover change estimations is considered as a key omission in the uncertainty analysis. Indonesia is committed to include these in the final version of the ER-PD, all according to the methodology proposed by GFI and Olofsson (2014).</p> <p>III (c) Reference Level → Criteria 10 – 13</p> <p>The reference level is estimated in line with the national FREL submitted by Indonesia to UNFCCC, with the inclusion of new activities. Moreover, it is expected that the ER Program will generate lessons that will contribute to the next submission of the national FRL/FREL. The start and end-date of the reference period is defined as 2007 and 2016, and the forest definition is specified, which is coherent with the forest definition used in the elaboration of the national FRL. The TAP recommends that the GoI explains the unusual high deforestation of 2016, which raises substantially the average emissions from deforestation.</p> <p>There was one indicator that generated technical discussion during the country visit. It is the upward adjustment of the reference level (above average annual historical emissions), due to the emissions in peat decomposition. Indonesia has modified the</p>	12.1	YES	YES	
	13.1	NO	NO	
	13.2	*	*	*
	13.3	*	*	*
	13.4	*	*	*
	14.1	NO	NO	
	14.2	YES	YES	
	14.3	NO	YES	
	15.1	NO	YES	
	16.1	NO	YES	
	17.1	NO	YES	
	17.2	NO	YES	
	17.3	N.A	N.A	
	17.4	N.A	N.A	
	18.1	NO	YES	
	18.2	NO	NO	
	19.1	YES	YES	
	20.1	N.A	N.A	
	20.2	N.A	N.A	
	21.1	YES	YES	
	21.2	N.A	N.A	
	22	NO	YES	
	23	YES	YES	

methodology of estimation and corrected the reference level. However, the TAP finds that there is still room for improving the reference level in peat decomposition.

III (d) Reference Level, Monitoring & Reporting on Emission Reductions → Criteria 14-16

During the term of the ERPA (2020-2024) and within the REDD Accounting Area, activity data (AD) and emission factors (EF) will be monitored following the procedure defined in the NFMS (national forest monitoring system) and National Forest Inventory (NFI).

In general terms, the methodology to estimate emissions during the MRV period is the same as the methodology used to estimate the reference level. During the country visit, it could be seen that Indonesia is working in improving the methodology to estimate degradation emissions (activity data) and burnt area.

One of the main concerns is the lack of the estimation of activity data with an unbiased methodology and as such the country needs to define the proper methodology to estimate it (see criteria 7-9). Monitoring of EF (AGB) will be done with field measurement from the permanent sampling plots (PSP) of the National Forest Inventory (NFI) system. The NFI program will increase the number of PSPs for the East Kalimantan region to reduce the uncertainties. During the ERPA, monitoring and verification will be carried out in 2022 and 2024. During the country visit, the TAP noted that at the province level, there are several activities with the focus to improve the activity data and emissions factors and that Indonesia has included them as part of the monitoring activities.

In summary, the monitoring and reporting on emissions reductions is robust and responsibilities clearly defined.

III (e) Accounting for Displacement (leakage) → Criterion 17

In section 10 of the ER-PD, the explanation or justification of the assessment of the risk is briefly described. However, in other sections of the document there is more evidence to substantiate the level of risk of displacement of each driver so the TAP finds that the assessment provided in this section is incomplete.

III (f) Accounting for Reversals → Criteria 18 – 21

The ER-PD has included the identification of the risk of reversals and ER Program designs features to prevent and mitigate reversals. Despite the indicator is accomplished, all the risk factors are briefly described and it is difficult to evaluate how effective the ER Program design and implementation will mitigate significant risks of Reversals. The TAP encourages the country to incorporate additional evidence of the mitigation actions. Indonesia should also stress the long-term impact of these activities, even beyond the end of the project.

III (g) Accounting for ERs → Criteria 22 - 23

The planned registry and data management system seems to be able to avoid double-counting of ERs in the near future. It is recommended to develop clear links between the registry system at the national level and the databases that will be developed to track the compliance of each participating actor. It is suggested that this link will be established through e.g. the development plans that are required at the different scales, from the

<p>design section, such that it is clear how the proposed actions are directly related to the drivers and actors that will be involved in carrying out the activities. This will facilitate the design of the BS arrangements, safeguards that need to be developed and policy and regulatory requirements that are need for each action.</p> <p>The range of land and resource tenure rights (including legal and customary rights of use, access, management, ownership, exclusion, etc.) as well as categories of rights- holders present in the Accounting Area (including Indigenous Peoples and other relevant communities) have been adequately explored and fine-tuned in the Advanced Draft ER-PD. The document also provides a detailed analysis of several sets of land tenure conflicts and regulatory or procedural gaps concerning the recognition of <i>adat</i> communities.</p> <p>However, questions remain concerning the effectiveness and feasibility of the legal and regulatory interventions proposed as part of the Program. Only fragments of a variety of regulatory regimes – on conservation, timber production, agriculture, aquaculture, mining etc. – are mentioned, and so the robustness of the planned interventions remains vague, including with respect to the revocability of licenses and concessions – a key component of the Program. The Advanced Draft ER-PD is also insufficiently clear when it comes to options for the Program to address the substantial number of <i>adat</i> communities not yet legally recognized by state authorities.</p> <p>The relationship between tenure positions and title to emission reductions is not conclusively portrayed (see further under Indicator 36.2).</p> <p>The Advanced Draft ER-PD is deemed compliant with Indicator 28.1 and non-compliant with Indicators 28.2 and 28.3. The lack of clarity on the issues raised holds a material risk for the implementation as a whole. Non-compliance is therefore considered to be severe (major).</p> <p>V. (b) Benefit sharing → Criteria 29 – 33</p> <p>Although various criteria and indicators of this section do not need to be met at this stage, the benefit sharing approach presented in the Advanced Draft ER-PD has a series of limitations and inconsistencies that makes it non-compliant against the applicable indicators 30.1 through 33.1. The benefit sharing plan (BSP) as outlined in the Advanced Draft ER-PD fails, in particular, to:</p> <ul style="list-style-type: none"> • Explain the process of identifying and selecting beneficiaries (in particular: which villages/communities will be included and through what means; which private companies); • Clarify the principles for disbursements (grants provided at cost basis or pro rata of ERs achieved, incentive elements, or other); • Provide conceptual ideas on the operational design (how and when can beneficiaries access funds); <p>Ensure that both active contributors and those negatively affected will be rewarded or compensated, respectively; and</p> <ul style="list-style-type: none"> • Show the basic process for the BSP to be adopted and approved (including by affected indigenous communities). <p>For <i>adat</i> communities, the Advanced Draft ER-PD restricts the list of potential beneficiaries to those communities that have obtained formal recognized status by the</p>				
---	--	--	--	--

<p>Government. No mitigation actions are provided to respond to a scenario in which a community is willing to contribute to the Program, or risks being negatively affected.</p> <p>The Advanced Draft ER-PD is deemed non-compliant with Indicator 33.1. Non-compliance is considered severe (major) given the number of inconsistencies found.</p> <p>V. (b) Benefit sharing → Criteria 29 – 33</p> <p>Although many criteria and indicators of this section are not required at this stage, the approach for BSP has a series of limitations that are explained under indicators 30.1 through 33.1. The ER-PD should complete the definition of:</p> <ul style="list-style-type: none"> • The process of identifying and selecting beneficiaries (in particular: which villages/communities will be included and through what means; which private companies); • The principles for disbursements (grants provided at cost basis or pro rata of ERs achieved, incentive elements, or other); • The operational design (how and when can beneficiaries access funds); or • The process for developing the BSP and its adoption and approval process (including through affected indigenous communities). <p>The BSP will need to ensure comprehensiveness in the sense that active contributors will be rewarded for their contribution. For adat communities, the ER-PD Draft restricts the list of potential beneficiaries to those communities that have obtained formal recognized status by the Government. It will be important for the ER-PD to clarify what this means for non-recognized adat communities and how risks of arbitrary treatment can be mitigated.</p> <p>V. (c) Non-Carbon Benefits → Criteria 34 – 35</p> <p>The Advanced Draft ER-PD identifies non-carbon benefits, in addition to emission reductions actions and investments to reduce deforestation and degradation in East Kalimantan, that the ER Program will result in.</p> <p>Such non-carbon benefits include above all the improvement of livelihoods of forest-dependent communities, and the protection of ecosystem services, including: biodiversity, improved water quality, soil fertility, flooding and erosion control, and habitats of game and fish.</p> <p>It should be indicated if the identification of the Non-Carbon Benefits is related to or derived from the stakeholder engagement process. How were Non-Carbon benefits developed, opinions collected and following steps to be carried out.</p> <p>In this section 3 indicators changed from NO to YES, and now 6 indicators comply with the methodological framework, whereas 4 indicators still need to be improved, of which 3 are considered as major and 1 as minor, whereas 3 indicators are not applicable</p>				
---	--	--	--	--

<p>VI. ER Program Transactions</p> <p>VI (a) ERPA Signing Authority and Transfer of Title To ERs → Criterion 36</p> <p>The Advanced Draft ER-PD states that the ERPA may “potentially” be signed by the Ministry of Finance, but that further consultations on the matter will be held by the Government.</p> <p>As of now, the indicator 36.1 is deemed not met. Non-compliance is deemed minor, as clarification on the matter should be forthcoming in the near future. The indicator must be found to be met, however, prior to ERPA signature.</p> <p>On title to ER and the authorization for transfer: The Advanced Draft ER-PD fails to explain the nature of ER title under Indonesian law and the relevance of land tenure holdings, including customary land tenure holdings, for the generation and/or allocation of such rights. Indicator 36.2 is, therefore, not met. Non-compliance is considered to be severe (major) given the relevance of the issue of legal title for the health of the transaction.</p> <p>Non-compliance of Indicator 36.3 follows non-compliance of Indicator 36.2 in that it has the same conditions. It concerns the timing of transfer, which in the current scenario does not raise additional concerns. Non-compliance is, therefore, found to be minor.</p> <p>VI (b) Data Management and ER Transaction Registries → Criteria 37 - 38</p> <p>The indicators relevant at this stage are deemed met, except for Indicator 37.4 for which relevant information (on administrative and audit procedures) is missing in the Advanced Draft ER-PD. Non-compliance is deemed minor.</p> <p>In this section 1 indicator changed from NO to YES, and now 4 indicators comply with the methodological framework, whereas 4 indicators still need to be improved, of which 1 is considered as major and 3 as minor, whereas 3 indicators are not applicable</p>	<p>36.1</p> <p>36.2</p> <p>36.3</p> <p>37.1</p> <p>37.2</p> <p>37.3</p> <p>37.4</p> <p>38.1</p> <p>38.2</p> <p>38.3</p> <p>38.4</p>	<p>NO</p> <p>NO</p> <p>NO</p> <p>YES</p> <p>YES</p> <p>YES</p> <p>NO</p> <p>NO</p> <p>NO</p> <p>YES</p> <p>*</p> <p>*</p> <p>*</p> <p>*</p>	<p>NO</p> <p>NO</p> <p>NO</p> <p>YES</p> <p>YES</p> <p>YES</p> <p>NO</p> <p>NO</p> <p>YES</p> <p>*</p> <p>*</p> <p>*</p> <p>*</p>	<p></p> <p></p> <p></p> <p></p> <p></p> <p></p> <p></p> <p></p> <p></p> <p></p> <p>*</p> <p>*</p> <p>*</p> <p>*</p>
<p>SUMMARY SCORE and overall comment:</p> <p>The first Draft of the ER-PD-Indonesia had an overall score of the initial assessment with 25 indicators that complied with the methodological framework, which increased in the Advanced Draft to 37 indicators that comply; in the first Draft 35 indicators required improvements in various sections, of which 23 remained No in the Advanced Draft; 11 are deemed with major non-conformities and 12 with minor non-conformities. In total, 18 indicators are not applicable at this stage. In each section a summary is presented with the main topics that still need attention from the Gol.</p>				

PART 2 OF TECHNICAL ASSESSMENT: DETAILED ASSESSMENT

<p>C. 1 The proposed ER Program is ambitious, demonstrating the potential of the full implementation of the variety of interventions of the national REDD+ strategy, and is implemented at a jurisdictional scale or programmatic scale.</p>	
<p>Ind. 1.1 The ER Program Measures aim to address a significant portion of forest-related emissions and removals</p> <p>[Ambition and strategic rationale for the ER Program – 2.2]</p>	<p>YES</p>
<p>As stated in the ER-PD, East Kalimantan’s annual emissions from deforestation, forest degradation, and peat degradation are approximately 38.9 million tCO₂e/yr, which is around 6% of the equivalent emissions at the national level. Over the ERPA period (2020 to 2024) the ER Program is estimated to lead to total emission reductions of 35.8 million tCO₂e, which is equivalent to an 18% reduction in the province’s reference level emissions over that period. As such, it can be considered to aim to address a significant portion of the emissions and removals of the jurisdictional area where it will be implemented and is considered as an important contribution to achieve national significant reductions.</p>	
<p>Ind. 1.2 The ER Program is ambitious, uses new or enhanced ER Program Measures to reduce Emissions or enhance removals, is undertaken at a jurisdictional scale and/or takes a programmatic approach (i.e., involves multiple land areas, landowners or managers within one or several jurisdictions), and reflects a variety of interventions from the national REDD+ strategy in a coordinated manner.</p> <p>[Ambition and strategic rationale for the ER Program – 2.2, 2.3]</p>	<p>YES</p>
<p>As pointed out in the ER-PD, a critical next step toward national REDD+ implementation is the finalization and implementation of subnational REDD+ frameworks. The proposed program offers a comprehensive approach to REDD+ that covers policy-level changes as well as field-based activities, and that addresses drivers of deforestation that are prevalent in most of Indonesia’s forested regions. Lessons gained from implementing the ER Program in East Kalimantan will be valuable in finalizing the design of the national REDD+ framework, including the national MRV system, safeguards approaches, benefit sharing and ER registration.</p>	
<p>C. 2 The Accounting Area matches a government- designated area that is of significant scale</p>	
<p>Ind. 2.1 The Accounting Area is of significant scale and aligns with one or more jurisdictions; or a national-government-designated area (e.g., ecoregion) or areas.</p> <p>[Accounting Area of the ER Program – 3.1]</p>	<p>YES</p>
<p>Indonesia has made significant progress toward developing a national REDD+ architecture, and is at a point where a jurisdictional program will provide added stimulus and practical knowledge for finalizing the national system. The accounting area represents about 6.6% of the total country area and a similar proportion of the forest-related GHG emissions. The accounting area has been on the forefront of REDD+ activities in Indonesia, and as such the program could serve as an example from which the lessons learned could serve as valuable tool to finalize the national REDD+ framework, including MRV, safeguards, benefit sharing and ER registration.</p>	
<p>C. 3 The ER Program can choose which sources and sinks associated with any of the REDD+ Activities will be accounted for, measured, and reported, and included in the ER Program Reference Level. At a minimum, ER Programs must account for emissions from deforestation. Emissions from forest degradation also should be accounted for where such emissions are significant.</p>	
<p>Ind. 3.1 The ER Program identifies which anthropogenic sources and sinks associated with any of the REDD+ Activities will be accounted for in the ER Program</p>	<p>YES</p>

[Description of Sources and Sinks selected – 8.1]	
The program will focus on reducing emissions from deforestation and forest degradation. The national REDD+ framework does not define activities for the conservation of carbon stocks, whereas emissions and removals from sustainable management of forests and stock enhancement are not included due to lack of data (particularly emission and removal factors).	
Ind. 3.2 The ER Program accounts for emissions from deforestation. [Description of Sources and Sinks selected – 8.1]	YES
Emissions from deforestation are identified as GHG emissions from the IPCC Land Use Change category forest land to non-forest land, plus emissions from peat decomposition, peat fire, and mangrove soils that are linked to deforestation. Deforestation is defined by Indonesia as the conversion of natural forest to other land uses (including non-natural forest). In the period 2007 to 2016 deforestation contributed 80% of total emissions in East Kalimantan. Conversion to agriculture, particularly to oil palm plantations, was the major cause of deforestation, while conversion to monoculture timber plantations also contributed significantly. Disturbance of degraded forest that leads to the change of degraded forest into shrubs is considered deforestation. Thus emission due to loss of carbon from the conversion of degraded forest to shrubs is reported under deforestation.	
Ind. 3.3 Emissions from forest degradation are accounted for where such emissions are more than 10% of total forest-related emissions in the Accounting Area, during the Reference Period and during the Term of the ER-PA. These emissions are estimated using the best available data (including proxy activities or data). [Description of Sources and Sinks selected – 8.1]	YES
Emissions from forest degradation include: <ul style="list-style-type: none"> - Emissions due to the degradation of primary forest - Emissions due to degradation caused by fire - Emission from peat decomposition - Emissions from logging Forest degradation in the national FREL is defined as a change of a primary forest class to a secondary forest class. Primary forest classes include primary dryland, primary mangrove and primary swamp forests. However, the use of the definition excludes continuing losses of carbon in the degraded forest due to further disturbance. The TAP suggest to describe better how possible double counting of emissions from degradation is avoided, as many data come from different sources (maps, hotspots, statistics). This is particularly the case with forest fires and logging. Identifying the degree of forest degradation is not a simple task, especially not on a routine basis with the currently used medium-resolution satellite imagery (Landsat); at present, Indonesia has no capacity and data available to assess different levels of degradation. However, the loss of carbon in the degraded forest due to fire as well as due to logging activities by the concessionaires is included as a proxy.	
C. 4 The ER Program should account for, measure and report, and include in the ER Program Reference Level, significant carbon pools and greenhouse gases, except where their exclusion would underestimate total emission reductions.	
Ind. 4.1 The ER Program accounts for all Carbon Pools and greenhouse gases that are significant within the Accounting Area, both for Reference Level setting and Measurement, Monitoring and reporting (MMR). [Description of Carbon Pools and greenhouse gases selected – 7.2]	YES
The ER program accounts for aboveground and belowground carbon pools and soil carbon for organic soils. Although dead wood may be considered as an important pool, this pool has not been taken into account due to lack of sampling	

data. Litter is considered as an insignificant pool. The soil carbon pool in mineral soils is excluded from the accounting, since the emissions from these soils are considered as not significant, without providing the data that would support this statement. However, exclusion of any of these pools underestimate total emission reductions of the program and as such this approach can be considered as conservative (this relates to indicator 4.2).

In terms of greenhouse gases, no data are available of CH₄ and N₂O emissions from peat drainage, but are taken into consideration for forest fires, following IPCC supplement on wetlands (2013).

<p>Ind. 4.2 Carbon Pools and greenhouse gases may be excluded if:</p> <ul style="list-style-type: none"> I. Emissions associated with excluded Carbon Pools and greenhouse gases are collectively estimated to amount to less than 10% of total forest-related emissions in the Accounting Area during the Reference Period; or II. The ER Program can demonstrate that excluding such Carbon Pools and greenhouse gases would underestimate total emission reductions. <p>[Description of Carbon Pools and greenhouse gases selected – 8.2]</p>	YES
---	------------

See 4.1

C. 5 The ER Program uses the most recent Intergovernmental Panel on Climate Change (IPCC) guidance and guidelines, as adopted or encouraged by the Conference of the Parties as a basis for estimating forest-related greenhouse gas emissions by sources and removals by sinks.

<p>Ind. 5.1 The ER Program identifies the IPCC methods used to estimate emissions and removals for Reference Level setting and Measurement, Monitoring and reporting (MMR).</p> <p>[Description of method used for calculating the average annual historical emissions over the Reference Period – 8.3]</p> <p>[Measurement, monitoring and reporting approach for estimating emissions occurring under the ER Program within the Accounting Area– 9.1]</p>	YES
--	------------

The Advanced Draft ER-PD mentions the use of the most recent IPCC guidelines of 2006 throughout the document and used the 2013 guidelines on estimations of emissions from wetlands. Deforestation and forest degradation were derived from annual maps, except for the period of 2006-2011, where only three maps were elaborated (2006, 2009, 2011). Emission factors of forest classes were derived from national forest inventories and as such can be considered as TIER2. The TAP suggest to use the allometric equation of Chave (2014) to estimate the biomass of the trees measured in the forest inventory, as Chave (2014) uses much more tree sample data to construct the equations, and allows adjustments of biomass estimations according to the wood density of each species, which is directly correlated to total biomass estimation (the equation also allows adjustments to precipitation classes, as water deficits affect tree architectural characteristics, such as diameter-height relations and as such total biomass, although this may not be applicable for Indonesia). Removals from sinks are not taken into account, as the program only will account for emission reductions.

C. 6 Key data and methods that are sufficiently detailed to enable the reconstruction of the Reference Level, and the reported emissions and removals (e.g., data, methods and assumptions), are documented and made publicly available online. In cases where the country’s or ER Program’s policies exempt sources of information from being publicly disclosed or shared, the information should be made available to independent reviewers and a rationale is provided for not making these data publicly available. In these cases, reasonable efforts should be made to make summary data publicly available to enable reconstruction.

<p>Ind. 6.1 The following methodological steps are made publicly available:</p> <ol style="list-style-type: none"> I. Forest definition; II. Definition of classes of forests, (e.g., degraded forest; natural forest; plantation), if applicable; III. Choice of activity data, and pre-processing and processing methods; IV. Choice of emission factors and description of their development; V. Estimation of emissions and removals, including accounting approach; VI. Disaggregation of emissions by sources and removal by sinks; VII. Estimation of accuracy, precision, and/or confidence level, as applicable; VIII. Discussion of key uncertainties; IX. Rationale for adjusting emissions, if applicable; X. Methods and assumptions associated with adjusting emissions, if applicable. <p>[Forest definition used in the construction of the Reference Level 9.2] [Description of method used for calculating the average annual historical emissions over the Reference Period 8.3] [Activity data & emission factors used for calculating the average annual historical emissions over the Ref. Period 8.3] [Measurement, monitoring and reporting approach for estimating emissions occurring under the ER Program within the Accounting Area 9.1]</p>	<p>NO</p>
<p>The most important data to reconstruct the reference level, as required by the criterion, are not sufficiently documented or made available to the TAP or public. The data that are mentioned in the Advanced Draft ER-PD also have shortcomings that do not allow to either reconstruct the reference level or the uncertainty related to the estimations. The indicator only requires that the TAP assesses if the data are publicly available, which does not cover completely the criterion, and are commented as such.</p> <p>I The definition of the forest used in the Advanced Draft ER-PD is publicly available and is in accordance with the national approach. The ER-PD does not document the possible effect of the definition on the uncertainty of the estimation of deforestation, as deforested plots smaller than 4 hectares will not be identified (see also indicator 7.1 and 7.2).</p> <p>II The forest classes are all well-defined.</p> <p>III The activity data that are taken into account are deforestation and forest degradation. However, the processing of the activity data is not well documented and as far as can determined from the description in the ER-PD, do not comply with the IPCC guidelines.</p> <p>IV The remaining biomass after was not taken into consideration in the calculation of the emissions, but is now available in the Advanced Draft ER-PD. However, the sources of the data are not available, nor how these data were used to calculate the emissions from deforestation. As the resulting non-forest class can hold various types of land cover classes in various stages of development (at the end date of the reference period) more detail is required and made publicly available how to estimate the biomass of the non-forest class, how these were subtracted from the biomass in each forest class in order to estimate the EF as suggested by the TAP during the country visit. Also the uncertainty related to these aggregation procedures needs to be made available in the calculations of the reference level and the uncertainty analysis (as the factor will be composed of various forest and non-forest classes, this will create an additional amount of accuracy uncertainty in relation to the way the data are grouped).</p> <p>V Land cover changes and their confidence interval are not presented, only total deforestation and forest degradation. More data need to be made available in order to be able to validate the reference level.</p> <p>VI removals are not taken into account in the accounting approach, and as such no data need to be made available.</p> <p>VII The estimations of accuracy, precision and confidence level cannot be reconstructed, as no data sources are available, or data sources are not used correctly (see also indicator 7.1 and 7.2).</p> <p>VIII There are no estimations of error in land cover change classes. In annex 12.1 the overall accuracy of the land cover maps is estimated, which is not equivalent to the uncertainty of each land cover change (there are also errors in the calculation of producer and user omissions). This is considered as one of the key uncertainties, for which methodologies are available to estimate these uncertainties (GFOI; Olofsson 2014). Other sources of uncertainty that have not been taken into account include the uncertainty related to the minimum area of the forest definition and emission factors.</p> <p>IX not applicable</p> <p>X not applicable</p>	

This is considered as a major non-conformity, as the information provided does not comply with the requirements set by the indicator.

Ind 6.2 For the following spatial information, maps and/or synthesized data are displayed publicly, and reasonable efforts are made to explain how these were derived from the underlying spatial and other data, and to make key data sets or analyses publicly available:

NO

- I. Accounting Area
- II. Activity data (e.g., forest-cover change or transitions between forest categories)
- III. Emission factors
- IV. Average annual emissions over the Reference Period
- V. Adjusted emissions

Any spatial data used to adjust emissions, if applicable.

[Forest definition used in the construction of the Reference Level 9.2]

[Description of method used for calculating the average annual historical emissions over the Reference Period 8.3]

[Activity data & emission factors used for calculating the average annual historical emissions over the Ref. Period 8.3]

[Measurement, monitoring and reporting approach for estimating emissions occurring under the ER Program within the Accounting Area 9.1]

I Maps of the accounting area are presented in the ER-PD

II No maps are available with the activity data, nor transition matrices between the forest classes and non-forest classes. Only a summary of annual deforestation and forest degradation is presented. The Indonesian government is committed to present land cover change estimations including their level of uncertainty.

III No data are available to reconstruct the emission factors of the various land cover types and activities.

IV No data are available to reconstruct the annual emissions over the reference period.

V Not applicable

This is considered as a major non-conformity, as the evidence provided is insufficient to assess conformance.

C.7 Sources of uncertainty are systematically identified and assessed in Reference Level setting and Measurement, Monitoring and reporting

Ind 7.1 All assumptions and sources of uncertainty associated with activity data, emission factors and calculation methods that contribute to the uncertainty of the estimates of emissions and removals are identified.

NO

[Activity data and emission factors used for calculating the average annual historical emissions over the Reference Period 8.3]

[Measurement, monitoring and reporting approach for estimating emissions occurring under the ER Program within the Accounting Area 9.1]

[Identification and assessment of sources of uncertainty 13.1]

Only some sources of statistical errors are taken into account in the uncertainty analysis. Sources of uncertainties that are not taken into consideration include the uncertainty of the activity data, the uncertainty related to the emission factors of non-forest classes, the uncertainty related to aggregating these classes to estimate the average non-forest emission factor or carbon density. It is also not clear if the same non-forest carbon density was used to estimate the emissions from deforestation for all forest types, or different aggregation procedures were used, depending on which one of the six forest types were deforested (primary and secondary dryland, mangrove, and swamp forest).

The estimation of uncertainty related to the different classes in the land cover maps, presented in annex 12.1 and 12.3, has errors in the formulas and the results are not applied correctly in the estimations of uncertainty in each land cover class (see e.g. Olofsson (2014)). The estimation of degraded forest, for example, has a much higher user and producer error than primary forest or non-forest (see table in annex 12.1), which should be reflected in a higher uncertainty of area estimations of the secondary forest cover classes. Currently uncertainty in the land cover classes are all estimated at 28%, which is derived from the overall map accuracy (calculated in annex 12.1). Likewise, these uncertainties are not the same as the uncertainties that need to be taken into account for the activity data, which are related to land cover change classes (in the case of Indonesia deforestation and forest degradation of the six forest types). As described in GFOI (2013; 2016), to comply with IPCC guidance, activity data need to be estimated from sample data using an unbiased estimator and a confidence interval, using the corresponding variance estimator. There are several papers in the remote sensing literature that discuss the need and describe the methods for statistical estimation of activity data. It would be rather straightforward to apply the stratified estimator and the corresponding variance estimator to that sample data for area estimation of the activity data (areas of the specific land cover classes that observe change or no change over time). During the country visit, a proposal of how to develop an uncertainty analysis of activity data was explained and the RS team of the Indonesian government is committed to include this analysis in the final ER-PD to estimate the reference level and their associated uncertainties. The uncertainty estimation of the emission factors need to take into account the uncertainty related to the grouping of non-forest land-cover classes and their respective estimation of biomass density.

Also, the emissions from peat decomposition and peat fires after deforestation need to be better explained. For example, peat fire in deforested land may be considered as part of the deforestation process and as such taken into account (by means of a legacy threshold that defines when peat fire in non-forest land is considered as part of the deforestation process, e.g. 1 year after clear cut).

This is considered as a major non-conformity, as it does not comply with the requirements set by the indicator;

Ind 7.2 The sources of uncertainty identified in Indicator 7.1: are assessed for their relative contribution to the overall uncertainty of the emissions and removals.
[Identification and assessment of sources of uncertainty 13.3]

NO

There is no unbiased estimator is used to estimate activity data and variance/standard error/CI, nor an estimate of the uncertainty in grouping biomass densities of the forest and non-forest types. As such, the relative contribution of each source of uncertainty (see indicator 7.1) is not determined. Of particular concern is the lack of data on uncertainty of the land cover change data and the aggregation procedures applied to the data of EF of forest and non-forest classes. The sources of the emission factors and their uncertainty of non-forest classes are not presented.

This is considered as a major non-conformity, as the information provided does not comply with the requirements set by the indicator

C 8 The ER Program, to the extent feasible, follows a process of managing and reducing uncertainty of activity data and emission factors used in Reference Level setting and Measurement, Monitoring and reporting.

Ind 8.1 Systematic errors are minimized through the implementation of a consistent and comprehensive set of standard operating procedures, including a set of quality assessment and quality control processes that work within the local circumstances of the ER Program.

NO

[Activity data and emission factors used for calculating the average annual historical emissions over the Reference Period, 13.2]

[Measurement, monitoring and reporting approach for estimating emissions occurring under the ER Program within the Accounting Area]

<p>The ER-PD mentions in various occasions that data collection procedures follow well established QA/QC and SOP. However, the first step to minimize the uncertainty in activity data is to quantify it and as described above, the uncertainty of the activity data has not been estimated. The same applies to the estimations of emission factors, as explained in indicator 7.1. The QA/QC and SOP protocols are not available and as such it is not clear if and how systematic errors are minimized.</p> <p>Minor non-conformity as the comments are directly related to the non-conformities of indicators 7.1 and 7.2</p>	
<p>Ind 8.2 Random errors and other uncertainties are minimized to the extent practical based on the assessment of their relative contribution to the overall uncertainty of the emissions and removals.</p> <p>[Activity data and emission factors used for calculating the average annual historical emissions over the Reference Period 10, 13]</p> <p>[Measurement, monitoring and reporting approach for estimating emissions occurring under the ER Program within the Accounting Area 9.1]</p> <p>[Identification and assessment of sources of uncertainty 13.1]</p>	<p>NO</p>
<p>The ER-PD mentions that additional plot data are collected within the jurisdictional area, in order to reduce the random error in the estimations of EF. There are other emission factors that need to be estimated, their relative importance in the overall uncertainty estimations needs to be assessed, and steps have to be defined to minimize the most important factors (such as emission factors from fires that cause forest degradation and emissions from peat degradation and peat fires). The uncertainty of activity data and emission factors are not quantified completely as mentioned under 7.1, as such, measures to reduce the uncertainty related to activity data and emission factors are also not identified.</p> <p>Minor non-conformity as this is directly related to the non-conformities of indicators 7.1 and 7.2.</p>	
<p>C 9 Uncertainty of activity data and emission factors used in Reference Level setting and Measurement, Monitoring and reporting is quantified in a consistent way, so that the estimation of emissions, removals and Emission Reductions is comparable among ER Programs</p>	
<p>Ind 9.1 Uncertainty associated with activity data and emission factors is quantified using accepted international standards, for example by providing accuracy, confidence interval, distribution of error, and propagation of error. Where errors in data and methods are considered large as defined in IPCC Guidelines, Monte Carlo methods (numerical simulations) should be used to estimate uncertainty</p> <p>[Activity data and emission factors used for calculating the average annual historical emissions over the Reference Period 13.1]</p> <p>[Measurement, monitoring and reporting approach for estimating emissions occurring under the ER Program within the Accounting Area 9.1]</p>	<p>NO</p>
<p>To estimate the uncertainty associated with the activity data and emission factors, Tier 1 estimation of aggregating uncertainties is applied, which refers to error propagation. However, it is not clear that all data have normal distributions of that allows the application of this type of error propagation. Considering that many sources of data, such as biomass distribution in forests, have non-normal distribution patterns and adding the missing sources of uncertainty that are mentioned under indicator 7.1 and 7.1 to the analysis, may require the use of Monte Carlo methods to estimate total uncertainty.</p> <p>This is a minor non-conformity as this can be readily applied, once the uncertainties in activity data and emission factors become available, as mentioned in indicator 7.1</p>	
<p>Ind 9.2 Uncertainty of the estimate of Emission Reductions is quantified using Monte Carlo methods. Underlying sources of error in data and methods for integrated measurements of deforestation, forest degradation and enhancements (e.g., as in a national forest inventory) are combined into a single combined uncertainty estimate and are reported at the two-tailed 90% confidence level</p>	<p>N.A</p>

[Quantification of uncertainty in Reference Level setting 13.2]	
Uncertainties in the data to estimate the reference level were combined,using simple error propagation methods.	
<p>Ind 9.3 Uncertainty of Emissions Reductions associated with deforestation, forest degradation and enhancements are reported separately if measured through separate (i.e., non-integrated) approaches and when degradation is estimated using proxy data.</p> <p>[Quantification of uncertainty in Reference Level setting 13.2]</p>	N.A
The data of deforestation and forest degradation are estimated separately, and as such no integrated methodology was used.	
10 The development of the Reference Level is informed by the development of a Forest Reference Emission Level or Forest Reference Level for the UNFCCC	
<p>Ind 10.1 The Reference Level is expressed in tons of carbon dioxide equivalent per year</p> <p>[Estimated Reference Level 9.7]</p>	YES
<p>The Reference level is presented in chapter 8 of the ER-PD. The chapter includes the reference period, forest definition used in the construction of the Reference Level, estimation methodology, activity data and emissions factors. The Reference Level has considered the emissions from deforestation and degradation.</p> <p>Non-CO2 GHG are considered since the Program includes emissions from forest fires, but weighted by their global warming potential, and the Reference level is expressed in tons of carbon dioxide equivalent.</p> <p>The TAP experts recommend reviewing the different tables in ER-PD with final estimation of emissions because there is a rounding problem in table 8.5 and others.</p>	
<p>Ind 10.2 The ER Program explains how the development of the Reference Level can inform or is informed by the development of a national Forest Reference Emission Level or Forest Reference Level, and explains the relationship between the Reference Level and any intended submission of a Forest Reference Emission Level or Forest Reference Level to the UNFCCC</p> <p>[Relation between the Reference Level, the development of a FREL/FRL for the UNFCCC and the country's existing or emerging greenhouse gas inventory 9.8]</p>	NO
<p>In chapter 8.6 of the ER-PD the relation between the Reference Level and the national FREL, which Indonesia submitted to the UNFCCC in 2016, is explained. Both documents are aligned and have used the same approach.</p> <p>The differences between the reference level and FREL are the geographical coverage, time frame of analysis and that the reference level includes additional activities such as reduced impact logging activity (RIL), mangroves conversions to aquaculture, among others. These new activities will be included in FREL in the future.</p>	

<p>It is expected that the ER Program will generate lessons that will contribute to the next submission of the national FRL/FREL, e.g. the addition of REDD+ activities, or the improvement of activity data and emission factors. The lessons learnt can be transferred between different products, as it has been explained during the country visit.</p> <p>The TAP recommends including further explanation in the ER-PD about the process of elaboration of these products (reference level, national FREL, sub-national reference level) and how they relate to each other in chapter 8.6 of the document. The improvement could also be made by relating this chapter to section 9 (MRV) and including part of the presentation that the country demonstrated during the country visit. In the Advanced Draft of the ER-PD this chapter was not improved, although it was all marked in yellow.</p> <p>Also, check the link to FREL submitted to UNFCCC, it is not working.</p> <p>This is a minor non-conformity, as this can be attended accordingly.</p>	
<p>Ind 10.3 The ER Program explains what steps are intended in order for the Reference Level to achieve consistency with the country’s existing or emerging greenhouse gas inventory</p> <p>[Relation between the Reference Level, the development of a FREL/FRL for the UNFCCC and the country’s existing or emerging greenhouse gas inventory 9.6]</p>	<p>NO</p>
<p>Indonesia’s GHG Inventory is managed by the Directorate for GHG Inventory and MRV, which also maintains the national registry system. The ER Program (through the local Environmental Agency) will report on the emission reductions generated by the implementation of the ER Program to the national registry system (explained in section 9 of the ER-PD). Therefore, the implementation of the ER Program will also provide inputs to the development of the national GHG Inventory.</p> <p>However, the process of the elaboration of the reference level and how it will achieve consistency with the country’s existing GHG Inventory is missing in the ER-PD. The Advanced Draft ER-PD has no improvements in this section compared to the Draft ER-PD and the TAP reiterates the necessity to improve and enlarge the description of the consistency between the Reference Level and the country’s greenhouse gas inventory.</p> <p>This is a minor non-conformity as there is in system in place by the ER-PD does not provide enough information with this regard.</p>	
<p>C 11 A Reference Period is defined</p>	
<p>Ind 11.1 The end-date for the Reference Period is the most recent date prior to two years before the TAP starts the independent assessment of the Draft ER Program Document and for which forest-cover data is available to enable IPCC Approach 3. An alternative end-date could be allowed only with convincing justification, e.g., to maintain consistency of dates with a Forest Reference Emission Level or Forest Reference Level, other relevant REDD+ programs, national communications, national ER program or climate change strategy</p> <p>[Reference Period 9.1]</p>	<p>YES</p>
<p>The end-date of the reference period is clearly defined in 2016 and is two years before the TAP independent assessment (2018). The end date of the reference period is in line with the methodological framework. In that same year the county also has forest-cover data with IPCC approach 3.</p>	
<p>Ind 11.2 The start-date for the Reference Period is about 10 years before the end-date. An alternative start-date could be allowed only with convincing justification as in Indicator 11.1, and is not more than 15 years before the end-date.</p>	<p>YES</p>

[Reference Period 9.1]	
<p>The start-date of the reference period is defined in the ER-PD as 2007. The TAP team have checked the spreadsheets with the calculation of emissions and understood that the year 2007 and 2016 are included in the period, making the start date of the reference period exactly 10 years before the end-date. Although it is not clarified the exact starting and finishing day in each year, it is understood that the complete year is included (1st January 2007 to 31st December 2016).</p>	
<p>C 12 The forest definition used for the ER Program follows available guidance from UNFCCC decision 12/CP.17</p>	
<p>Ind 12.1 The definition of forest used in the construction of the Reference Level is specified. If there is a difference between the definition of forest used in the national greenhouse gas inventory or in reporting to other international organizations (including an Forest Reference Emission Level or Forest Reference Level to the UNFCCC) and the definition used in the construction of the Reference Level, then the ER Program explains how and why the forest definition used in the Reference Level was chosen.</p> <p>[Forest definition used in the construction of the Reference Level 9.2]</p>	<p>YES</p>
<p>The national definition of forest submitted to UNFCCC is a land area of minimum 6.25 ha with trees higher than 5 meters at maturity and a canopy cover of more than 30 percent.</p> <p>However, in the ER-PD the term “working definition” of forest was used. This definition is used to produce land-cover maps through visual interpretation of satellite images at a scale that minimum area for polygon delineation is 0.25 cm² at 1: 50,000 of scale which equals to 6.25 ha. This definition is in accordance with the Indonesian National Standard (SNI) 8033:2014 on “Method for calculating forest cover change based on results of visual interpretation of optical satellite remote sensing image”.</p> <p>The object identification is purely based on the appearance in the imagery. Manual- visual classification through an on-screen digitizing technique based on key elements of image/photo-interpretation was applied as a classification method. This is a very demanding work but Indonesia Government showed, during the country visit, that they have the capacity and the resources to do it.</p> <p>The definition of forest used in reference level is the same as in the National FREL and it is consistent with national GHG Inventory.</p>	
<p>C 13 The Reference Level does not exceed the average annual historical emissions over the Reference Period. For a limited set of ER Programs, the Reference Level may be adjusted upward by a limited amount above average annual historical emissions. For any ER Program, the Reference Level may be adjusted downward.</p>	
<p>Ind 13.1 The Reference Level does not exceed the average annual historical emissions over the Reference Period, unless the ER Program meets the eligibility requirements in Indicator 13.2. If the available data from the National Forest Monitoring System used in the construction of the Reference Level shows a clear downward trend, this should be taken into account in the construction of the Reference Level</p> <p>[Average annual historical emissions over the Reference Period 9.6, 13.2]</p>	<p>NO</p>
<p>The Reference Level is estimated as an average of emissions of the historical period. The only activity that is not following this methodology is peat decomposition.</p> <p>During the country visit, Indonesia team explained the assumptions taken to estimate emissions from peat decomposition in deforestation and degradation. The country is assuming that there is a minimum level of emissions</p>	

that will remain during the ERPA period, which are the emissions resulting from the peat decomposition in degraded and deforested area. The country is also assuming that additional deforestation will occur in peat lands during the ERPA period, adding new emissions to the inherited level of emissions of this activity.

During the country visit, this issue was largely discussed with the Government of Indonesia and the actual ER-PD was modified with a revised methodology to estimate future emission from the peat decomposition. Emissions from peat decomposition in the Reference Level is set to be constant with the same value as the last year of the historical period. This means that under the monitoring period no deforestation has to occur in peat forest. If there is no deforestation in peat forest, the ER Program will get zero emission reduction from the activity. On the country, if a minimum area of peat forest is deforested during the monitoring period, the ER Program will could result in lower emission reductions. The TAP considers that this could be an acceptable course of action and area of improvement as it was discussed during the TAP mission.

However, as the historical emissions from peat decomposition is not considering the emissions from peat decomposition before the year 2007, the same approach could be applied to the accounting of emissions in the monitoring period. In other words, accounting of emissions after 2020 for peat decomposition would start from zero. The Reference Level can be calculated with the average emissions of the historical period from peat decomposition, if in the monitoring period the emissions from this activity also starts from zero and neglects the inherited emissions.

Moreover, there is a spike in GHG emissions in the year 2016 which is unclear. The GoI may want to explain the unusual high deforestation that occurred in 2016, which raises substantially the average emissions from deforestation.

This is considered as a major non-conformity as the evidence provided to prove conformity is insufficient to confirm compliance

<p>Ind 13.2 The Reference Level may be adjusted upward above average annual historical emissions if the ER Program can demonstrate to the satisfaction of the Carbon Fund that the following eligibility requirements are met:</p> <p>(i) Long-term historical deforestation has been minimal across the entirety of the country, and the country has high forest cover (country or jurisdictional area);</p> <p>(ii) National circumstances have changed such that rates of deforestation and forest degradation during the historical Reference Period likely underestimate future rates of deforestation and forest degradation during the Term of the ERPA.</p> <p>[Explanation and justification of proposed upward or downward adjustment to the average annual historical emissions over the Reference Period, Quantification of the proposed upward or downward adjustment to the average annual historical emissions over the Reference Period 9.6].</p>	<p>N.A</p>
<p>Not applicable</p>	
<p>Ind 13.3 For countries meeting the eligibility requirements in Indicator 13.2, a Reference Level could be adjusted above the average historical emission rate over the Reference Period. Such an adjustment is credibly justified on the basis of expected emissions that would result from documented changes in ER Program circumstances, evident before the end-date of the Reference Period, but the effects of which were not fully reflected in the average annual historical emissions during the Reference Period. Proposed adjustments may be rejected for reasons including, but not limited to:</p> <p>i. The basis for adjustments is not documented; or</p> <p>ii. Adjustments are not quantifiable.</p>	<p>N.A</p>

[Explanation and justification of proposed upward or downward adjustment to the average annual historical emissions over the Reference Period, Quantification of the proposed upward or downward adjustment to the average annual historical emissions over the Reference Period 9.6]	
Not applicable	
<p>Ind 13.4 An adjustment of the Reference Level above the average annual historical emissions during the Reference Period may not exceed 0.1%/year of Carbon Stocks</p> <p>[Explanation and justification of proposed upward or downward adjustment to the average annual historical emissions over the Reference Period, Quantification of the proposed upward or downward adjustment to the average annual historical emissions over the Reference Period 9.6]</p>	N.A
Not applicable	
<p>C 14 Robust Forest Monitoring Systems provide data and information that are transparent, consistent over time, and are suitable for measuring, reporting and verifying emissions by sources and removals by sinks, as determined by following Criterion 3 within the proposed Accounting Area</p>	
<p>Ind 14.1 The ER Program monitors emissions by sources and removals by sinks included in the ER Program’s scope (Indicator 3.1) using the same methods or demonstrably equivalent methods to those used to set the Reference Level.</p> <p>[Measurement, monitoring and reporting approach for estimating emissions occurring under the ER Program within the Accounting Area 10.1]</p>	NO
<p>During the term of the ERPA (2020-2024) and within the REDD Accounting Area, activity data (AD) and emission factors (EF) will be monitored following the procedure defined in the NFMS (national forest monitoring system) and National Forest Inventory (NFI).</p> <p>The ER Program will apply methods for monitoring activity data and estimating emission factors for deforestation in accordance with the approach used when developing Indonesia’s FREL. This includes established standards for the interpretation of satellite imagery to estimate forest cover changes.</p> <p>During the country visit, it was explained that there will be a new method to estimate degradation and that the country is also developing a new approach for estimating the burnt areas using satellite images in combination with hotspot and verified with observed burnt area data on the ground. Both methods are not yet finished and are not incorporated in the program.</p> <p>The TAP encourages Indonesia to incorporate further information on these new methods and what is the progress towards their incorporation in future ER-PDs. In addition, in the case the methods are in place during the ERPA period, elaborate how this information will be considered in the recalculation of the reference level (if allowed by the methodological framework) and emission reductions. Also, include the description of the MRV system from the province level and how this will be merged into the national level. This is requested to have a more detailed section.</p> <p>The estimation of uncertainty of the activity data has not been performed yet, and it has neither been included in the MRV program. During the country visit, a proposal on how to develop an uncertainty analysis of activity data was explained and the RS team is committed to proceed in including this procedure in the estimation of the reference level and emission reductions. The activity data and associated uncertainties will be accounted for in the uncertainty analysis (see also indicator 7.1 and 7.2)</p> <p>Also, activity data related to logging in the logging area was derived from the annual logging plan documents from natural forest logging concessions. This is accessible in province forestry agencies. During monitoring, the selective logging area will be assessed in concessions implementing RIL. The TAP recommends incorporating more explanation in the ER-PD,</p>	

demonstrating that the activity data for emissions from logging in the MRV section is following the same approach as in the reference level.

This is considered as a minor non-conformity given that the provided evidence is insufficient but can be readily attended.

Ind 14.2 Activity data are determined periodically, at least twice during the Term of the ERPA, and allow for ERs to be estimated from the beginning of the Term of the ERPA. Deforestation is determined using IPCC Approach 3. Other sinks and sources such as degradation may be determined using indirect methods such as survey data, proxies derived from landscape ecology, or statistical data on timber harvesting and regrowth if no direct methods are available

YES

[Measurement, monitoring and reporting approach for estimating emissions occurring under the ER Program within the Accounting Area 9.1]

The paragraphs below summarize the monitoring of every activity data.

Deforestation: The activity data will be monitored annually, with the same approach as in the reference level. The methodology requires adjustments, as explained in various indicators.

Degradation will be monitored annually with the same approach as deforestation and with the reference level. However, there is an existing method to determine different levels of degraded forest (no degraded, medium degraded, highly degraded) that has already been applied in some districts in East Kalimantan, and that could be applied to the whole Province in the future. The TAP recommends incorporating this method in the ER-PD, as requested in indicator 14.1.

Monitoring of the area of mangrove converted to aquaculture follows the same procedure as described under deforestation.

Activity data related to logging during monitoring will be assessed in concessions implementing RIL, every year, but for concessions without RIL will be estimated from logging statistics.

At the moment, the Government of Indonesia is developing a new approach for estimating burnt areas, using satellite image (Landsat 7/8) in combination with hotspot data and verified with observed burnt area data on the ground. This new approach might be adopted in the future as this approach will have higher certainty. Meanwhile, the ER-PD is considering the monitoring of forest fires annually with the same method applied for the estimation of the reference level.

Ind 14.3 Emission factors or the methods to determine them are the same for Reference Level setting and for Monitoring, or are demonstrably equivalent. IPCC Tier 2 or higher methods are used to establish emission factors, and the uncertainty for each emission factor is documented. IPCC Tier 1 methods may be considered in exceptional cases

YES

[Measurement, monitoring and reporting approach for estimating emissions occurring under the ER Program within the Accounting Area 10.1]

The monitoring of Emission Factors for aboveground biomass in forests (used in deforestation and degradation emission calculations) will be done with field measurements from the permanent sampling plot of the National Forest Inventory system. Monitoring of carbon densities of non-forest classes is not considered in the current methodology. During the ERPA, monitoring, reporting and verification will be carried out at minimum in 2022 and after 2024 and the new data will be used to improve the accuracy. In the case the improvement is significant, the Reference Level will be recalculated, in case the methodological framework allows that.

Emission Factors for peat decomposition and mangrove soils will not be monitored to maintain consistency with the EF used in the development of REL.

Emission factors from logging will be monitored following the procedure defined in the Protocol on Auditing of Logging Performance (TNC, 2015) and VCS methodology VMD0047 respectively. For the construction of the RL, Griscom et al., 2014 was used, which applies the same methodology.

The Government of East Kalimantan has developed a web portal for the sub-national MRV system for managing all the processed data from the national and also from local governments. The system is to be operated by the Provincial Environmental Office (DLH) as the East Kalimantan MRV Focal Point. The system is still using a temporary server but will be migrated to East Kalimantan Province server. This MRV web portal will increase public participation of OPD to village communities or indigenous people to participate in monitoring the condition of forests and changes in the forest/land that occurs.

C 15 ER Programs apply technical specifications of the National Forest Monitoring System where possible

Ind 15.1 ER Programs articulate how the Forest Monitoring System fits into the existing or emerging National Forest Monitoring System, and provides a rationale for alternative technical design where applicable.

[Relation and consistency with the National Forest Monitoring System 10.3]

YES

Section 9 of the ER-PD provides information of the approach for measurement, monitoring and reporting. In chapter 9.3 it is also explained it's relation with the existing National Forest Monitoring System. MMR system of the ER Program will be institutionally integrated with the national forest monitoring system. As it is requested in the indicator, the ER Program is articulating how the Forest Monitoring System fits into the existing National Forest Monitoring System (NFMS), as they are fully integrated, articulation is clear and robust.

However, during the TAP's country visit, the MRV system was explained with more detail, and the relation with different institutions under the MRV were better understood. It was seen that the Forest Monitoring System was also complemented by sub-national institutions measuring and monitoring at the ground level. These institutions need to be harmonized and aggregated to the national level. The TAP recommends to quote all the relations that already exist between the MRV and the NFMS, to improve the section that explains this relation in the ER-PD

C 16 Community participation in Monitoring and reporting is encouraged and used where appropriate

Ind 16.1 The ER Program demonstrates that it has explored opportunities for community participation in monitoring and reporting, e.g., of ER Program Measures, activity data, emission factors, safeguards and Non-Carbon Benefits, and encourages such community participation where appropriate

[Measurement, monitoring and reporting approach for estimating emissions occurring under the ER Program within the Accounting Area 10.1, 10.3]

YES

Community participation play an important role in the ER Program through monitoring activities.

There are many entities (village governments, community groups, concessions) that will participate in monitoring of deforestation. Among other activities, the ER entities will be involved in conducting ground checking and in monitoring and reporting the occurrence of deforestation in the accounting area to the Working Group on REDD+. There is also a mobile application that has been developed for the monitoring of forest and that is connected to the MRV web-portal.

C 17 The ER Program is designed and implemented to prevent and minimize potential displacement

Ind 17.1 Deforestation and degradation drivers that may be impacted by the proposed ER Program measures are identified, and their associated risk for displacement is assessed, as well as possible risk mitigation strategies. This assessment categorizes Displacement risks as high, medium or low.

[Identification of risk of Displacement 11.1]

YES

<p>In section 10 of the ER-PD, risks of displacement are properly identified and assessed. Although the explanation or justification of the assessment of the risk is briefly described, the document in other sections has more evidence to understand the grade of the risk of displacement of each driver.</p> <p>During the country visit, the TAP found that there was more explanatory and supporting information to extend the analysis in this section: existing decrees, FSC certification in timber forests, amount of HCV that companies must protect, national moratoriums, plans to increase the oil palm productivity (instead of area), involvement of communities in monitoring, social forestry, among others. The TAP recommended to incorporate these aspects in the corresponding chapter. The analysis has been improved with satisfactory information.</p>	
<p>Ind 17.2 The ER Program has in place an effective strategy to mitigate and/or minimize, to the extent possible, potential Displacement, prioritizing key sources of Displacement risk.</p> <p>[ER Program design features to prevent and minimize potential Displacement 11.2]</p>	<p>YES</p>
<p>As explained in indicator 17.1, the displacement analysis is better described in the Advanced Draft of the ER-PD.</p> <p>Although the description is satisfactory, Indonesia also has to demonstrate that there is a prioritization of the key sources of possible displacement, for example, focusing on the drivers that have a “medium” and “high” risk of displacement.</p>	
<p>Ind 17.3 By the time of verification, the ER Program has implemented its strategy to mitigate and/or minimize potential Displacement</p>	<p>N.A</p>
<p>Only applicable at the time of verification.</p>	
<p>Ind 17.4 ER Programs are also invited to report on changes in major drivers in the ER Accounting Area, any Displacement risks associated with those drivers, and any lessons from the ER Programs’ efforts to mitigate potential Displacement</p>	<p>N.A</p>
<p>Only applicable at the time of verification.</p>	
<p>C 18 The ER Program is designed and implemented to prevent and minimize the risk of reversals and address the long-term sustainability of ERs</p>	
<p>Ind 18.1 The ER Program has undertaken an assessment of the anthropogenic and natural risk of reversals that might affect ERs during the Term of the ERPA and has assessed, as feasible, the potential risk of reversals after the end of the Term of the ERPA</p> <p>[Identification of risk of Reversals 12.1]</p>	<p>YES</p>
<p>ER-PD has included the identification of the risk of reversals and the ER Program design features to prevent and mitigate reversals, and as such complies with this indicator.</p> <p>The country has considered all the risk factors of reversals: “Lack of comprehensive and sustained support of the relevant stakeholders”, “lack of institutional capacities and/or ineffective vertical/inter-sectoral coordination”, “lack of long-term effectiveness in addressing the underlying causes” and “exposure and vulnerability to natural phenomena”.</p> <p>The risk factors are briefly described and difficult to interpret by an outsider. The TAP encourages the country to incorporate additional information concerning the mitigation actions, and demonstrate how the risk rating was applied</p>	

to each factor. Indonesia should also clarify better the long-term impact of these activities, even beyond the end of the project (see indicator 18.2).	
<p>Ind 18.2 The ER Program demonstrates how effective ER Program design and implementation will mitigate significant risks of Reversals identified in the assessment to the extent possible, and will address the sustainability of ERs, both during the Term of the ERPA, and beyond the Term of the ERPA</p> <p>[ER Program design features to prevent and mitigate Reversals 12.2]</p>	NO
<p>The indicator requires demonstrating how effective the ER program is. The ER program design and implementation should mitigate significant risks of reversals. However, the ER-PD section related to reversals and their mitigation actions is briefly and broadly described. As an example, the mitigation actions to reduce the risk factor “lack of long-term effectiveness in addressing the underlying causes” is described as: “The ER-PD is designed to support significant policy reforms which are supported by legal decrees and long-term planning document. The ER-PD will integrate REDD+ programs in regional and district development planning at provincial, district/city and village levels.”</p> <p>With such reduced information it is not possible to assess if and how effective ER Program design and implementation will mitigate significant risks of Reversals.</p> <p>The TAP considers that the description of the activities with their long-term impact needs to be better explained. Following the example above, there is a need to describe what is “significant policy reform”, which are the decrees mentioned, what do they says, etc.</p> <p>This is considered as a minor non-conformity given that the provided evidence is insufficient but can be readily attended.</p>	
<p>C 19 The ER Program accounts for Reversals from ERs that have been transferred to the Carbon Fund during the Term of the ERPA</p>	
<p>Ind 19.1 During the Term of the ERPA, the ER Program accounts for Reversals from ERs using one of the following options:</p> <ul style="list-style-type: none"> ▪ Option 1: The ER Program has in place a Reversal management mechanism (e.g., buffer reserve or insurance) that is substantially equivalent to the Reversal risk mitigation assurance provided by the ‘ER Program CF Buffer’ approach referred to in option 2 below, appropriate for the ER Program’s assessed level of risk, which in the event of a Reversal during the Term of the ERPA will be used to fully cover such Reversals. ▪ Option 2: ERs from the ER Program are deposited in an ER Program-specific buffer, managed by the Carbon Fund (ER Program CF Buffer), and based on a Reversal risk assessment. ERs deposited in the ER Program CF Buffer (Buffer ERs) will not be transferred to the Carbon Fund. In the event that a Reversal event occurs during the Term of the ERPA, an amount of Buffer ERs will be cancelled from the ER Pro <p>[Reversal management mechanism, Selection of Reversal management mechanism 12.3]</p>	YES
Indonesia has selected option 2	
<p>C 20 The ER Program, building on its arrangements put in place during the readiness phase and during the Term of the ERPA, will have in place a robust Reversal management mechanism to address the risk of Reversals after the Term of the ERPA</p>	

<p>Ind 20.1 At the latest 1 year before the end of the Term of the ERPA, the ER Program will have in place a robust Reversal management mechanism or another specified approach that addresses the risk of Reversals beyond the Term of the ERPA</p>	<p>N.A</p>
<p>Only applicable before the end of the ERPA term.</p>	
<p>Ind 20.2 If the ER Program has selected option 2 under Indicator 19.1, all or a portion of the Buffer ERs of the ER Program, subject to a Carbon Fund review of the Methodological Framework and a decision of the parties to the ERPA in 2019, will be transferred to the mechanism identified in Indicator 20.1 at the end of the Term of the ERPA. If the ER Program fails to meet the requirements of Indicator 20.1, all remaining Buffer ERs in the ER Program CF Buffer will be cancelled</p>	<p>N.A</p>
<p>Only applicable before the end of the ERPA term.</p>	
<p>C 21 The ER Program monitors and reports major emissions that could lead to reversals of ERs transferred to the Carbon Fund during the Term of the ERPA</p>	
<p>Ind 21.1 The ER Program Monitoring Plan and Monitoring system are technically capable of identifying Reversals [Monitoring and reporting of major emissions that could lead to Reversals of ERs 12.4]</p>	<p>YES</p>
<p>As it was seen during the country visit, there is a good MRV system and NFMS that is capable of identifying reversals. However, further explanation should be included in chapter 11.4 of the ER-PD</p>	
<p>Ind 21.2. The ER Program reports to the Carbon Fund within 90 calendar days after becoming aware of any emissions in the Accounting Area or changes in ER Program circumstances that, in the reasonable opinion of the ER Program, could lead to Reversals of previously transferred ERs by the next Monitoring event. The ER Program explains how the potential Reversals would be addressed by additional ER Program Measures or by the Reversal management mechanism described in Indicator 19.1.</p>	<p>N.A</p>
<p>Only applicable at the time a reversal occurs and at the time of verification.</p>	
<p>C 22 Net ERs are calculated by the following steps:</p> <ol style="list-style-type: none"> 1. Subtract the reported and verified emissions and removals from the Reference Level 2. Set aside a number of ERs from the result of step 1, above, in a buffer reserve. This amount reflects the level of uncertainty associated with the estimation of ERs during the Term of the ERPA. The amount set aside in the buffer reserve is determined using the conservativeness factors for deforestation listed in the MF. For estimated emissions reductions associated with degradation, the same conservativeness factors may be applied if spatially explicit activity data (IPCC Approach 3) and high-quality emission factors (IPCC Tier 2) are used. Otherwise, for proxy-based approaches, apply a general conservativeness factor of 15% for forest degradation Emission Reductions. 3. Set aside a number of ERs in the ER Program CF Buffer or other reversal management mechanism created or used by an ER Program to address Reversals 	

[Ex-ante estimation of the Emission Reductions 14.3]	YES
<p>Chapter 13 of the ER-PD presents the calculation of the emission reductions that the program has the intention to achieve (ex-ante estimations). The emission reductions under the program are estimated within each activity: deforestation, primary forest degradation, peat decomposition, mangrove soils, logging and forest fires. The final estimation of emissions reduction is considering to set aside from the uncertainty level and the risk of reversals that is calculated in chapter 11.4 of the ER-PD.</p>	
<p>C 23 To prevent double-counting, ERs generated under the ER Program shall not be counted or compensated for more than once. Any reported and verified ERs generated under the ER Program and sold and/or transferred to the Carbon Fund shall not be sold, offered or otherwise used or reported a second time by the ER Program Entity. Any reported and verified ERs generated under the ER Program that have been sold and/or transferred, offered or otherwise used or reported once by the ER Program Entity shall not be sold and transferred to the Carbon Fund</p>	
(i) [Participation under other GHG initiatives 18.1]	YES
<p>Up to now, the Emission Reduction Program, or any part of the Emission Reduction Program has not transferred and is not planning to transfer Emission Reductions to any other GHG Mitigation Initiative. It is expected that the final decision on whether to use excess ERs for domestic compliance or to engage with other GHG initiatives will be finalized by the signing of the ERPA.</p>	
(ii) [Data management and Registry systems to avoid multiple claims to ERs 19.2]	YES
<p>As stated in the ER-PD, the National Registry System (SRN) provides data management for: FREL/FRL, MRV reporting, implementation of Social and Environmental Safeguards (integrated with Safeguards Information System/SIS), implementation costs and source of costs, supporting activities, and contribution to NDC. SRN manager is responsible for maintaining consistency between data and information on REDD+ implementation at national and sub-national levels and avoidance of double counting. Implementation of SRN PPI is done by stages: registration, technical data validation, and verification of actions and resources.</p>	
<p>C 24 The ER Program meets the World Bank social and environmental safeguards and promotes and supports the safeguards included in UNFCCC guidance related to REDD+</p>	
<p>Ind 24.1 The ER Program demonstrates through its design and implementation how it meets relevant World Bank social and environmental safeguards, and promotes and supports the safeguards included in UNFCCC guidance related to REDD+, by paying particular attention to Decision 1/CP.16 and its Appendix I as adopted by the UNFCCC</p> <p>[Description of how the ER Program meets the World Bank social and environmental safeguards and promotes and supports the safeguards included in UNFCCC guidance related to REDD+ 15.1]</p>	YES
<p>It is requested by the FCPF Carbon Fund Method Methodological Framework that the design of the ER program considers and fulfills World Bank and UNFCC social and environmental safeguards requirements.</p> <p>Section 14.1.1 of the Advanced Draft ER-PD has been improved describing how the Program is being designed considering the standards of the referred safeguards guidelines in relation with the assessment of the environmental and social risks and impacts of the Program and the development of the instruments to appropriately manage those risks and impacts.</p>	

In order to mainstream environmental and social risk mitigation measures into the ER program development, Indonesia's government is currently developing the following safeguards instruments:

- the REDD+ Safeguards Information System
- the national safeguards framework
- the REDD+ Social and Environmental Standards for East Kalimantan Province
- the Strategic Environmental and Social Assessment (SESA) and subsequent Environmental and Social Management Framework (ESMF), and
- a Feedback, and Grievance Redress Mechanism (FGRM).

Safeguards instruments under development are expected to enhance the existing country systems for the management of environmental and social aspects of the ER program.

Among the development of the above mentioned safeguards instruments, MoEF and East Kalimantan Government have performed different efforts to meet the World Bank and UNFCCC safeguards requirements such as:

- (a) consultations with a broad range of stakeholders (section 5.1),
- (b) analytical work and policy development processes pertaining to REDD+ development, taking into account possible social and environmental risks and adverse impacts, and (section 14.1.2)
- (c) development of initial measures to minimize and/or offset such risks and impacts, such as on biodiversity, livelihood and land titling.

The PRISAI and SES-REDD+ Kaltim outline safeguards compliance standards consistent with World Bank safeguards principles, and include safeguards performance indicators that will need to be achieved by program entities.

The ESMF and FGRM, which are currently being finalized, will serve as reference safeguards instruments that will bring together earlier safeguards initiatives into a more comprehensive framework.

Analysis carried out during the SIS-REDD+ process, indicates that existing instruments in general provide adequate coverage for many of the Cancun Safeguards.

The Advanced Draft ER-PD adequately identifies WB Operational Policies triggered by the Program (Section 14.1.2).

A compatibility analysis has been introduced in the revised ER-PD document (Annex 14.1), identifying possible gaps is conducted on the relevant instruments of the existing Safeguards of the WB and GoI (Table 14.3), against the identified environmental and social impacts of ERP that are described in Section 14.1.2.2.

No significant gaps between Indonesian safeguards and the World Bank safeguards policies were identified, except on the FGRM. The analysis however is subject for refinement upon completion of the assessment (SESA, FGRM and BSM) currently being conducted. It is stated that identified gaps will be used to further refine the safeguards instruments.

Ind 24.2 Safeguards Plans address social and environmental issues and include related risk mitigation measures identified during the national readiness process, e.g., in the SESA process and the ESMF, that are relevant for the specific ER Program context (e.g., land tenure issues), taking into account relevant existing institutional and regulatory frameworks. The Safeguards Plans are prepared concurrently with the ER Program Document, and are publicly disclosed in a manner and language appropriate for the affected stakeholders

[Description of how the ER Program meets the World Bank social and environmental safeguards and promotes and supports the safeguards included in UNFCCC guidance related to REDD+ 15.1]

NO

The TAP finds that the Advanced Draft ER-PD adequately describes efforts that are currently being developed in order to assess environmental and social risks and impacts.

Although an initial assessment of the potential risks and impacts has been conducted (Section Annex 14.2, 14.3), SESA, ESMF and FGRM development are still being finalized.

It is expected that those documents will allow to assess the environmental and social risks and impacts related to the Program and to develop safeguards instruments to appropriately manage those risks.

Although mitigation measures to manage social and environmental risks are briefly described (Table 14.7, Annex 14.1), it is necessary to complete their development with the information that will be provided by the SESA and the ESMF.

Safeguards instruments need to include the development of RPF and IPPF in order to manage IP participation and conflicts and disputes over land rights that have been identified.

Regarding IP is particularly important that the Program development, and the IPPF that should be prepared, demonstrates how their participation is aligned with OP 4.10 requirements, specifically regarding a free, prior, and informed consultation process.

The assessment should ensure risks are minimized and impacts avoided or mitigated appropriately, considering local institutional capacity to address the identified risks.

There is no indication of the safeguards instruments that will be developed/implemented in order to manage E&S risks and impacts.

The document fails to demonstrate that:

- a) Safeguards Plans under preparation will adequately address environmental and social risks that are identified (Annex 14.2);
- b) that are being developed through a participatory process; and,
- c) how they are going to be disclosed.

This is considered as a major non-conformity given the relevance of the involved shortcomings.

C 25 Information is provided on how the ER Program meets the World Bank social and environmental safeguards and addresses and respects the safeguards included in UNFCCC guidance related to REDD+, during ER Program implementation

Ind 25.1 Appropriate monitoring arrangements for safeguards referred to in Criterion 24 are included in the Safeguards Plans

YES

[Description of arrangements to provide information on safeguards during ER Program implementation 15.2 and 6.1]

Although Safeguards Plans haven't yet been prepared, Principle, Criteria, Indicator (PCI) is the basis for the development of SIS-REDD+, which serves as an umbrella reporting and monitoring platform for safeguards compliance for the overall ER program implementation.

SIS-REDD+ is currently being piloted in East Kalimantan and necessary improvements are being sought by the Province to further operationalize the SIS-REDD+.

A Safeguards Implementation Assessment Tool was developed and provides a checklist of supporting documents required as evidence of REDD+ safeguards implementation.

Section 14.2.2 (Table 14.8) summarizes the main content of the Safeguards Information System (SIS) REDD+ .

SIS-REDD+ present the necessary information on how safeguards are managed and respected in REDD+ activities, ranging from the project sites to district, provincial and national SIS management units. An institutional structure and distribution of tasks and responsibilities for the information system from the site to national level have been established.

Error! Reference source not found. Two components were created to promote transparency and ease access to safeguards information provided in SIS-REDD+:

- 1. A database, to manage data and information on safeguards implementation; and
- 2. A website, tracking progress on safeguards implementation

<p>The SIS-REDD+ website (http://ditjenppi.menlhk.go.id/sisredd) provides a public access to REDD+ implementers or users to report their activities by filling in the checklists and uploading necessary documents as required by the APPS.</p> <p>SIS-REDD+ has been designed to receive inputs from various stakeholders and allow SIS management units at the sub-national and national levels to work with independent third parties through the establishment of a Multi-Stakeholder Forum or Institution.</p> <p>The documents properly indicate further development and improvement that are required to ensure a sound information system on safeguards that can support a full implementation of REDD+ efficiently, that includes: (a) improving the institutional and legal mandate, and (b) capacity building.</p>	
<p>Ind 25.2 During ER Program implementation, information on the implementation of Safeguards Plans is included in an annex to each ER monitoring report and interim progress report. This information is publicly disclosed, and the ER Program is encouraged to make this information available to relevant stakeholders. This information is also made available as an input to the national systems for providing information on how safeguards are addressed and respected (SIS) required by the UNFCCC guidance related to REDD+, as appropriate.</p>	<p>N.A</p>
<p>Only applicable at the time of verification.</p>	
<p>C 26 An appropriate Feedback and Grievance Redress Mechanism (FGRM) developed during the Readiness phase or otherwise exist(s), building on existing institutions, regulatory frameworks, mechanisms and capacity</p>	
<p>Ind 26.1 An assessment of existing FGRM, including any applicable customary FGRMs, is conducted and is made public. The FGRM applicable to the ER Program demonstrates the following:</p> <ul style="list-style-type: none"> i) Legitimacy, accessibility, predictability, fairness, rights compatibility, transparency, and capability to address a range of grievances, including those related to benefit-sharing arrangements for the ER Program; ii) Access to adequate expertise and resources for the operation of the FGRM <p>[Description of the Feedback and Grievance Redress Mechanism (FGRM) in place and possible actions to improve it 15.3]</p>	<p>NO</p>
<p>The FGRM is currently being developed to coordinate across existing mechanisms to address grievances and disputes.</p> <p>Under the existing internal MOEF's FGRM systems, specific coordination mechanisms, including definition roles and responsibilities are currently being developed and will be finalized as part of the development of ERP institutional arrangements.</p> <p>The ERP FGRM is currently placed under the SIS-REDD+ system, set up by the Ministry of Environment and Forestry, that is being developed further into a web-based FGRM. The Government is in the process of refining the FGRM to best address ERP, including an internal and cross-sectoral coordination mechanism and referral system (Figure 14.2).</p> <p>This Advanced Draft ER PD document includes a gap analysis of the existing safeguards against World Bank Safeguards policies that comprises an initial assessment of existing FGRM mechanisms.</p> <p>It is mentioned that under the ERP, a Program Management Unit (PMU) at the national level and provincial REDD+ Taskforce, with extension units at the district level will be established to monitor and report grievances and conflicts to relevant stakeholders in a coordinated and timely manner.</p>	

<p>The following FGRM processes are identified: a) receive and record grievance; b) screen and categorize grievances; c) acknowledge receipt and its follow up action; d) refer to the relevant ministries, for non ER P grievances, e) investigate, for ER P grievances, which includes field visit for verifying and validating grievances; f) act/follow up and g) conclude. An appeal to the court might take place, in the case of not reaching a mutually agreed resolution. It is needed to include information in order to assess them.</p> <p>An initial analysis and identification of the relevant regulatory frameworks and their roles in FGRM especially with regards to conflict handling has been conducted and it is stated that this will feed into the current initiative of FRGM refinement.</p> <p>It is understood that there are multiple mechanisms involving multiple agencies at both national and sub-national levels that comprises the ERP FGRM under the SIS-REDD+ system.</p> <p>The document does not clarify if the ER Program will develop and implement a cross-sectoral coordination mechanism and better informed their characteristics (process to be followed to receive, screen, address, monitor, and report feedback on, grievances or concerns submitted by affected stakeholders). The Advanced Draft ER-PD doesn't demonstrates how the FGRM has been made public.</p> <p>This is considered as a minor non-conformity given that it will be verified in the next verification event.</p>	
<p>Ind 26.2 The description of FGRM procedures, included in the Benefit-Sharing Plan and/or relevant Safeguards Plans, specifies the process to be followed to receive, screen, address, monitor, and report feedback on, grievances or concerns submitted by affected stakeholders. As relevant, the Benefit-Sharing Plan and/or relevant Safeguards Plans and/or ER Program Document describe the relationship among FGRM(s) at the local, ER Program, and national levels</p> <p>[Description of the Feedback and Grievance Redress Mechanism (FGRM) in place and possible actions to improve it 15.3]</p>	<p>NO</p>
<p>Although the Advanced Draft ER-PD adequately states efforts that are being made in order to develop FGRM procedures, it still lacks to provide information that allows to understand how the process to be followed to receive, screen, address, monitor, and report feedback on, grievances or concerns submitted by affected stakeholders.</p> <p>Section 14.3.1 describes the existing FGRM processes under ERP and the principles that their development will adopt, but needs to better describe the relationship among FGRM(s) at the local, ER Program, and national, provincial and district levels.</p> <p>Though the document states with regards to BSP that any grievances regarding the carbon fund payment transfer and its mechanism will be addressed through the FGRM (Chapter 14.3), it is not clear if the BSP grievances will be processed through the FGRM.</p> <p>This is considered as a major non-conformity given that no evidence was provided of the FGRM procedures to manage grievances or concerns, submitted by affected stakeholders.</p>	
<p>Ind 26.3 If found necessary in the assessment mentioned in Indicator 26.1, a plan is developed to improve the FGRM</p> <p>[Description of the Feedback and Grievance Redress Mechanism (FGRM) in place and possible actions to improve it 15.3]</p>	<p>YES</p>
<p>Section 14.3.4. outlines a Plan to improve FGRM that includes, among others, the following efforts:</p> <ul style="list-style-type: none"> • Well defined measures for monitoring, reviewing and reporting the FGRM to feed into the corrective actions such as revisiting KRP, changing mitigation plans. • Enforcement mechanisms of administrative and legal sanctions. • The President Office's LAPOR, a web-based FGRM initiative • Community consultative meetings for development planning and implementation (<i>Musyawarah Perencanaan Pembangunan/Musrenbang</i>), available at all levels, including the village level. 	

- Better defined incentives and disincentives to be used as part of a grievance handling mechanism (like incentives for the community to provide accurate reports).
- Legal mitigation and litigation technical support: These are often required especially for the communities who are in dispute with companies.
- Better community engagement in the development and refinement of FGRM through providing checks and balances.
- Translating further the national FGRM regulatory frameworks (such as on AMDAL and KLHS) in a more practical, comprehensive and appropriate manner.
- Well qualified paralegals at field levels, with skills and experience as mediators and facilitators.

C 27 The ER Program describes how the ER Program addresses key drivers of deforestation and degradation

Ind 27.1 The ER Program identifies the key drivers of deforestation and degradation, and potentially opportunities for forest enhancement

YES

[Analysis of drivers and underlying causes of deforestation and forest degradation, and existing activities that can lead to conservation or enhancement of forest carbon stocks 4.1]

The key drivers of deforestation and degradation are explained in Section 4.1. “Analysis of drivers and underlying causes of deforestation and forest degradation, and existing activities that can lead to conservation or enhancement of forest carbon stocks.”

The ER-PD reports seven main drivers of deforestation and forest degradation in Indonesia, particularly in East Kalimantan, i.e.

- 1) Mining
- 2) Conversion of natural forests to industrial timber plantations
- 3) Conversion of forest to estate crops
- 4) Deforestation due to encroachment for subsistence agriculture
- 5) Aquaculture in mangrove forests
- 6) Fire
- 7) Unsustainable logging practices

TAP finds significant improvement in the current Advanced Draft ER-PD. The document has described and explained strong arguments of the drivers of deforestation in East Kalimantan. The relation of the main drivers of deforestation and the eight underlying factors of deforestation, i.e. inadequate policies to protect remaining natural forest inside concessions, lack of incentives, unclear forest boundaries, lack of willingness and capacity on sustainable management practices, low productivity due to limited access to technology and finance, limited livelihood opportunities, lack of capacity of the supervising agency, and lack of incentives for sustainable management practices, have been explained clearly.

Overall TAP finds that the ER-DP document has accommodated inputs and comments according to the consultation process in Jakarta, Bogor, and Samarinda. However, some notes are given in the ER-PD document that several assumptions cannot be verified and may not be fully accurate, meaning that the actual impact of each driver may differ from the estimation, e.g. some of the land use designations may have been made after deforestation had already taken place. In sum, however, TAP agrees that the ER-PD has provided an indication of the relative scale of each driver and identified activities that can address deforestation in East Kalimantan.

<p>Ind 27.2 The ER Program identifies currently planned ER Program Measures and how they address the key drivers identified in Indicator 27.1, and the entities that would undertake them</p> <p>[Description and justification of the planned actions and interventions under the ER Program that will lead to emission reductions and/or removals 4.3]</p> <p>[Institutional and implementation arrangements 6.1]</p>	<p>YES</p>
<p>TAP finds that the revised ER-PD has addressed seven main drivers of deforestation, i.e. (1) mining, (2) timber plantations, (3) estate crops, (4) subsistence agriculture, (5) aquaculture in mangrove forests, (6) natural and human-induced fires, and (7) unsustainable logging practices. Besides those main drivers, the ER-PD also explains seven underlying causes of deforestation, i.e.</p> <ol style="list-style-type: none"> 1. Lack of a conducive incentives framework 2. Poor spatial planning leading to unclear land use boundaries 3. Lack of willingness and capacity to implement sustainable management practices 4. Low productivity of local farming due to limited access to technology and finance 5. Limited alternative livelihood opportunities for local communities 6. Lack of capacity for supervision of forested areas 7. Lack of incentives for sustainable management practices (sustainable forest management, sustainable plantation) <p>Those underlying causes of deforestation have been explained clearly, including institutions and persons who are responsible (in charge) for each activity to mitigate or address those causes of deforestation. The ER-PD team has restructured the document and now the revised ER-PD has shown that the proposed programs (activities) address the main and underlying drivers of deforestation.</p> <p>The ER-PD highlighted that it is very important to consider potential transformation of the institutional framework for forest governance, from the center to the local level in the form of Forest Management Units (FMU or KPH). There are also some important national and province-level efforts to address the broader land governance issues, such as overlapping land rights, lack of access for local communities, and resulting conflict. The ER-PD also mentions that there are significant changes in private sector governance with greater focus on sustainability, driven in part by market pressure. The ER-PD convinces that most activities are integrated into national and province-level strategies and development plans. In addition, the program design also considers the distribution of remaining forests, the threats to those forests, and the key stakeholders involved in the respective areas.</p> <p>The ER-PD mentions that the activities to address deforestation and forest degradation are grouped into six components. The first two components address weak land and forest governance. The second component seeks to strengthen the capacity of the government to protect remaining forests. The third and fourth components are concerned with the management practices of oil palm companies and forestry companies respectively. The fifth component seeks to address deforestation linked to encroachment and agriculture from communities surrounding forest areas, and the last component includes all activities related to program management, including monitoring and evaluation. The revised ER-PD also provides an overall summary of the different components and subcomponents of the ER Program and how they respond to the drivers of deforestation and forest degradation.</p>	
<p>C 28 The ER Program has undertaken and made publicly available an assessment of the land and resource tenure regimes present in the Accounting Area</p>	
<p>Ind 28.1 The ER Program reviews the assessment of land and resource tenure regimes carried out during the readiness phase at the national level (i.e., SESA) and, if necessary, supplements this assessment by undertaking an additional assessment of any issues related to land and resource tenure regimes in the Accounting Area that are critical to the successful implementation of the ER Program, including:</p>	<p>YES</p>

<p>I. The range of land and resource tenure rights (including legal and customary rights of use, access, management, ownership, exclusion, etc.) and categories of rights-holders present in the Accounting Area (including Indigenous Peoples and other relevant communities);</p> <p>II. The legal status of such rights, and any significant ambiguities or gaps in the applicable legal framework, including as pertains to the rights under customary law;</p> <p>III. Areas within the Accounting Area that are subject to significant conflicts or disputes related to contested or competing claims or rights, and if critical to the successful implementation of the ER Program, how such conflicts or disputes have been or are proposed to be addressed; and</p> <p>IV. Any potential impacts of the ER Program on existing land and resource tenure in the Accounting Area.</p> <p>The ER Program demonstrates that the additional assessment has been conducted in a consultative, transparent and participatory manner, reflecting inputs from relevant stakeholders</p> <p>[Description of land tenure systems, analysis of laws and regulatory framework 4.4 and 4.5, stakeholder consultation process 5.1]</p>	
<p>The Advanced Draft ER-PD has significantly improved from the Draft ER-PD. The Advanced Draft ER-PD makes reference to an earlier assessment of land and resource tenure regimes carried out during the readiness phase at the national level and in the Accounting Area. That assessment is of particular importance for the purpose of the ER Program. The range of land and resource tenure rights (including legal and customary rights of use, access, management, ownership, exclusion, etc.) and categories of rights- holders present in the Accounting Area (including Indigenous Peoples and other relevant communities) have been explored in the assessment and are presented in the Advanced Draft ER-PD.</p> <p>The Advanced Draft ER-PD gives an overview of the range of rights and categories of rights holders in East Kalimantan, as well as the Indonesia’s system of land administration is regulated by the central government constitution 1945 and basic agrarian law No. 5/1960. According to those laws, it is concluded that generally land status can be divided into three categories, i.e. state land, indigenous peoples’ land, and private land. On state land, rights can be allocated to individuals or to legal entities through concessions and licenses. State lands include the entire area designated as Forest Estate, and lands without private title that are outside the forest estate, so called APL.</p> <p>According to Decentralization Law 23/2014, the Forest Estate (with the exception of forest conservation areas) is managed by the provincial government and controlled by the national government. Day-to-day management of these areas is the mandate of the Forest Management Units (KPH). All forest conservation areas (such as Nature Reserves, Wildlife Reserves, and National Parks) are controlled and managed by the central government, i.e. Ministry of Environment and Forestry. The lands outside the Forest Estate are under the mandate of the district and provincial governments. These can issue licenses for agriculture (estate crops), mining, and public works, as well as allocated for local/indigenous peoples. The Advanced Draft ER-PD mentions that local communities in East Kalimantan manage land areas for settlement, cultivation, and for social facilities and worship. Local land-uses include the collection of non-timber forest products and various forms of agroforestry systems, while the types of land ownership claim depend on the history of each community group.</p> <p>The Advanced Draft ER-PD explains that the community generally gains verbal land ownership, with physical or written evidence. Verbal recognition is the recognition of community groups to ownership and/or control of land. Generally, knowledge is owned by the Traditional Institutions (Adat), and partly owned by the Village Officials. Recognized physical evidence can be an orchard (having various local names, such as <i>Lembo</i>, <i>Rondong/Kutai</i>, <i>Munaant/Tunjung</i>, <i>Simpukng/Benuaq</i>) or previous evidence of use in other forms. Documents that have been used as evidence for ownership include: Land Certificates from Village Heads, Letters of Declaration of Release of Land Rights from Heads of Sub-districts or Notaries, and individual or communal land certificates for land ownership.</p> <p>The Advanced Draft ER-PD mentions also that lack of clearly and formally recognized rights to customary forest areas has led to the overlap of commercial land use licenses with customary lands, often resulting in conflict or dispossession,</p>	

or both. The resulting land access regimes are often the outcome of negotiated processes, where lack of clearly codified rights often places customary communities at a disadvantage to large concession holders. The government has initiated several measures to address disputes related to land ownership. In East Kalimantan there is extensive experience in resolving conflict through conciliation, mediation, and arbitration. Also, the provincial Forestry Office has established a Forest Conflict Resolution Desk, and the provincial Plantation Office has developed an Integrated Team to resolve plantation conflict.

The Advanced Draft ER-PD states that the Agrarian Reform Program covers 9 million hectares of land nationally. In the Agrarian Reform Program, the government targets legalizing land ownership plots of 4.5 million hectares and redistributing another 4.5 million hectares to specified citizens, such as small farmers. About half of this land is currently outside the forest estate, and the other half is non-productive or non-forested land that will be released from the forest estate. The most significant area of reform, in terms of area, number of people affected, and impact on social equity, is related to legal developments that affect the ownership status of forests claimed by indigenous communities. The East Kalimantan Government has released Provincial Regulation on Guideline for the Recognition of Indigenous Peoples in East Kalimantan. Through this guideline, the recognition of indigenous and tribal peoples is done through the formation of an Indigenous People's Committee (Governor's Regulation No. 1/2015). The Advanced Draft ER-PD explains that social forestry licenses are agreements between the state and communities for accessing and using areas within the forest estate for specified purposes. The main social forestry schemes are Community Forests (Hutan Kemasyarakatan or HKM), Village Forests (Hutan Desa or HD), and Community Plantation Forests (Hutan Tanaman Rakyat, HTR) and partnerships (kemitraan).

The Advanced Draft ER-PD highlights that unclear land tenure is a major underlying driver of deforestation and degradation and that it is an important barrier to REDD+. A significant portion of the ER Program is designed to address this issue, and to support relevant ongoing reform processes to mitigate deforestation and forest degradation. The legal status of such rights, and any significant gaps in the applicable legal framework, including as pertains to the rights under customary are explained in the Advanced Draft ER-PD. The document also mentions that the areas within the Accounting Area that are subject to significant conflicts or disputes related to contested or competing claims or rights, and if critical to the successful implementation of the ER Program, how such conflicts or disputes have been or are proposed to be addressed. The drivers of conflicts have been identified and stated in the ER-PD document.

The Advanced Draft ER-PD has also discussed potential impacts of the ER Program on existing land and resource tenure in the Accounting Area. The Advanced Draft ER-PD has provided a generally good overview of different land use titles and (often overlapping) land tenure regimes, and evolving concepts of customary (adat) law. The regulatory safeguards, e.g. logging activities that are relevant with indigenous peoples and "adat" (customary community) have been listed.

The Advanced Draft ER-PD identifies the government bodies responsible for the granting of estate crops licenses on conversion land. The Advanced Draft ER-PD also contextualizes the impacts of the 2014 decentralization act (Law 23/2014) due to the shifting responsibility of forest management from the district to province, and it clarifies which government body is responsible for the social forestry licenses, ecosystem restoration forest license grant, and discussed in more detail, the implications of the landmark ruling.

Ind 28.2 The ER Program explains how the relevant issues identified in the above assessment have been or will be taken into consideration in the design and implementation of the ER Program, and in the relevant Safeguards Plan(s). If the ER Program involves activities that are contingent on establishing legally recognized rights to lands and territories that Indigenous Peoples have traditionally owned or customarily used or occupied, the relevant Safeguards Plan sets forth an action plan for the legal recognition of such ownership, occupation, or usage. Beyond what is required for the successful implementation of the ER Program, the ER Program is encouraged to show how it can contribute to progress towards clarifying land and resource tenure in the Accounting Area, where relevant.

NO

<p>[Assessment of land and resource tenure in the Accounting Area 4.4]</p> <p>[Description and justification of the planned actions and interventions under the ER Program that will lead to emission reductions and/or removals 4.3]</p>	
<p>The Advanced Draft ER-PD identifies intervention components targeted and tailored to the tenurial challenges, namely support for the development of spatial planning policies, transparency and access-to-information procedures, and the revocation of licenses and better enforcement of protection regimes, as well as facilitative help to improve dispute settlement procedures and the level of community participation, mainly in social forestry programs (see sec. 4.3.1).</p> <p>A number of issues are not yet conclusively addressed, namely:</p> <ul style="list-style-type: none"> • Legality of licensing procedures: The Advanced Draft ER-PD explains that a key intervention will consist in facilitating the revocation of licenses and permits that are not “clean and clear” (see section 4.3.1, Component 1). However, the underlying basis for such revocation remains vague. The Advanced Draft ER-PD states that 809 out of 1404 mining licenses should be revoked, but it does not explain why. It would also be helpful to understand whether or to what extent the existing (i) estate crop licenses and (ii) logging permits are equally challengeable and whether all future licenses can be considered illegal given the various moratoriums and other regulations. The Advanced Draft ER-PD does mention that some of the estate crop licenses are in areas that are “off-limit” under the respective moratorium (probably the Governor’s), and that they may be “possibly amended”, but details are missing. • Future licensing: In this context, it would seem also important to understand how the Program will impact future instances of license issuances. • Regulatory regimes: The Advanced Draft ER-PD is strong on mapping land use and licensing terms, but the underlying regulatory regimes are only described on the margins, if at all. Are national, regional or district level provisions on spatial planning in place, and how do they – or if they do not exist: how does the lack of such provisions – impact the Program? Does the Mining Code present a threat or an opportunity for the Program? Does the Forestry Code or any other legal framework provide a legal basis for certain stakeholders to legally challenge licenses – whether for estate crops, logging or mining – that are not fully clean and clear? Are there any laws that could be invoked to stop the conversion of land to aquaculture or help restore coastal wetlands? All major legal regimes impacting land use and land tenure should be covered in the chapter, at least in table format. • Furthermore, it is unclear how the ER Program will respond to the incomplete recognition process for adat communities. The Advanced Draft ER-PD states that formal recognition is needed for participation in the program, and it suggests, in sec. 14 (Safeguards), that obstacles for non-recognized communities in terms of land access may be expected from the ER Program. It would be helpful to understand how many communities will be affected and what the expectation is for the timing and outcome of the ongoing recognition process. Also, it should be explored whether there are options for the ER Program to improve the scope of eligibility/accessibility (and perhaps emancipate it from the formal recognition process under Indonesian law) or else describe why this is not possible. Negative impacts from the ER Program must be mitigated. Where mitigation fails, the risk that tenure positions are impinged on is likely to be critical. This may also impact the authority to transfer carbon title (see further on Indicator 18.3 and Indicator 26.2). <p>This is considered as a major non-conformity as the evidence provided to prove conformity is lacking or insufficient.</p>	
<p>Ind 28.3 The ER Program provides a description of the implications of the land and resource regime assessment for the ER Program Entity’s ability to transfer Title to ERs to the Carbon Fund</p> <p>[Transfer of Title to ERs 18.2]</p>	<p>NO</p>
<p>The Advanced Draft ER-PD makes reference to (i) article 33 of the Constitution, which lays down that the control of natural resources is a prerogative of the state, (ii) Law No 41 of 1999 (Forestry Code), which specifies that the Ministry of Environment and Forestry has the power to regulate forest use, including the relationship between a natural person and the forest, (iii) various other provisions that provide a legal mandate for the central government to manage carbon storage and absorption and to develop a national emissions trading scheme, and (iv) a recent Ministerial Regulation on REDD+ Procedures (P.70 of 2017).</p>	

It concludes from these provisions that the country's forests are controlled and owned by the State, a title which would extend to "carbon" given that "[carbon] constitutes approximately 50% [of] the dry mass of trees" (Footnote 59).

The argument lacks conclusiveness. First, it is not apparent that any of the provisions mentioned directly deal with the title to emission reductions. In fact, the ER-PD recognizes that the only set of rules which directly addresses REDD+, Ministerial Regulation P.70 of 2017 (which replaces earlier regulations on the matter from 2014 and 2015) does not regulate ER title. Second, the provisions listed are clear evidence for the regulatory power of the (central) Government, including the power to approve any subnational REDD+ activities (Ministerial Regulation P.70 of 2017), but it does not explain why this power would extend to ownership rights over the resource or related rights.

Third, it is not self-evident that ER title is part of the natural resource or falls within its scope in the first place. The fact that trees store "carbon" does not necessarily explain why – to use the language of Ministerial Regulation P.70 of 2017 (Art. 1, sec. 26) "verified emission reduction results" would equally be "part" of such trees.

At this stage, the ER-PD fails to provide information whether or to what extent Indonesian law defines ER title or provides legal instruments that may assume the functional role of ER title under the Methodological Framework. In this context, a discussion is needed on the question to what extent land tenure holders, including adat communities, have a claim towards the ER Program concerning participation, REDD+ results and benefits.

This is considered as a major non-conformity as the evidence provided to prove conformity is lacking or insufficient.

C 29 The ER Program provides a description of the benefit-sharing arrangements for the ER Program, including information specified in Indicator 30.1, to the extent known at the time.

Description of benefit-sharing arrangements [16.1 in ER-PD of 15 Jan. 2016]

YES

It is established that funding from the Carbon Fund will go to the Ministry of Finance, from where funds will be transferred to the Environmental Fund Management Agency, which is currently being developed and which is expected to be established by the end of 2018.

The Advanced Draft ER-PD included Annex 15 that describes how direct financial benefits will be channeled through the designated Custodian Bank, with payments based on calculations compiled and submitted by the Provincial Government, through the Provincial Environmental Service, to the Environmental Fund Management Agency (BPD LH), after it has been verified by MoEF.

All transfers, whether via BPD LH or through on-granting, will be verified by the Ministry of Environment and Forestry to ensure that they are based on performance, and meet the principles and criteria of REDD+ and the Carbon Fund.

BPD LH's REDD+ Program will serve as the central funding mechanism for the implementation of the National REDD+ Strategy in Indonesia. The BPD LH will manage and mobilize environmental funds from various sources, including donors, the private sector, international agencies, foreign governments, local governments and the central government. Funding could come from the issuance of green bonds, from proceeds from carbon trading, and non-tax revenue such as licensing fees.

Entities will be able to access the fund by submitting a concept note to the BPD LH together with proof of emission reductions that are recorded in the national registry. After the BPD LH endorses the concept note, the proponent completes a full proposal that will be assessed by the technical team. If the proposal meets the requirements, the Head of BPD LH will give approval and there will be a contractual agreement between the BPD LH, the custodian bank, and the proponent. The agreement will be a tool for MoEF to monitor the payment through the national registry, and for BPD LH to evaluate the utilization of the results-based payment.

Although it is stated that pertinent criteria and supporting documents for accessing REDD+ payments will be developed, the ER-PD will have to complete the definition of:

- a) categories of potential beneficiaries and the eligibility criteria to receive monetary and non-monetary benefits,
- b) types and scales of such potential benefits,

<p>c) the relationship between potential beneficiaries and emission reduction strategies,</p> <p>d) monitoring provisions of the BSP</p> <p>e) the mechanism under which communities (and other beneficiaries) will be selected for funding and how the Benefit Sharing Plan is adopted or approved by each participating beneficiary.</p>	
<p>C 30 The Benefit Sharing Plan will elaborate on the benefit-sharing arrangements for Monetary and Non-Monetary Benefits, building on the description in the ER Program Document, and taking into account the importance of managing expectations among potential beneficiaries.</p>	
<p>Ind 30.1 The Benefit-Sharing Plan is made publicly available prior to ERPA signature, at least as an Advanced Draft, and is disclosed in a form, manner and language understandable to the affected stakeholders for the ER Program. The Benefit-Sharing Plan contains the following information:</p> <p>The categories of potential Beneficiaries, describing their eligibility to receive potential Monetary and Non-Monetary Benefits under the ER Program and the types and scale of such potential Monetary and Non-Monetary Benefits that may be received. Such Monetary and Non-Monetary Benefits should be culturally appropriate and gender and inter-generationally inclusive. The identification of such potential Beneficiaries takes into account emission reduction strategies to effectively address drivers of net emissions, anticipated implementers and geographical distribution of those strategies, land and resource tenure rights (including legal and customary rights of use, access, management, ownership, etc. identified in the assessments carried out under Criterion 28), and Title to ERs, among other considerations.</p> <p>Criteria, processes, and timelines for the distribution of Monetary and Non-Monetary Benefits.</p> <p>Monitoring provisions for the implementation of the Benefit-Sharing Plan, including, as appropriate, an opportunity for participation in the monitoring and/or validation process by the Beneficiaries themselves</p> <p>[Description of benefit-sharing arrangements 16.1]</p>	<p>NA</p>
<p>Section 15.1.4 identifies the following beneficiaries of REDD+ and of the ER Program:</p> <ol style="list-style-type: none"> (1) The National Government, through its role in REDD+ implementation at the national level (2) Local government, through its role in REDD+ implementation at the subnational level (3) NGOs and CSOs that support local REDD+ actors (4) Private businesses that have legal permits in REDD+ areas or that support local REDD+ actors (5) Educational and research institutions that contribute to emission reductions (6) Community associations that are REDD+ actors or support those that are (7) Other institutions that meet the criteria set by the Steering Committee. <p>The Advanced Draft ER-PD includes Annex 15 that describes direct and indirect benefits and a proposed proportion of benefits to be distributed based on the performance of the beneficiary in emission reductions.</p> <p>This indicator is considered as not applicable at this stage.</p>	
<p>C 31 The benefit-sharing arrangements are designed in a consultative, transparent, and participatory manner appropriate to the country context. This process is informed by and builds upon the national readiness process, including the SESA, and taking into account existing benefit-sharing arrangements, where appropriate</p>	
<p>Ind 31.1 The Benefit-Sharing Plan is prepared as part of the consultative, transparent and participatory process for the ER Program, and reflects inputs by relevant stakeholders, including broad community</p>	<p>NA</p>

<p>support by affected Indigenous Peoples. The Benefit-Sharing Plan is designed to facilitate the delivery and sharing of Monetary and Non-Monetary Benefits that promote successful ER Program implementation. The Benefit-Sharing Plan is disclosed in a form, manner and language understandable to the affected stakeholders of the ER Program</p> <p>[Description of stakeholder consultation process 5.1]</p> <p>[Summary of the process of designing the benefit-sharing arrangements 16.2]</p>	
<p>ER-PD revised version states that the Benefit Sharing Mechanism will be designed through a consultative process involving key stakeholders.</p> <p>Further arrangement on financial management and benefit sharing will be discussed with stakeholders, including CSOs and NGOs at the district, provincial, and national level levels.</p> <p>An initial workshop, including representatives from MOEF, MOF, the East Kalimantan Government, development partners and national NGOs, were held to discuss the channeling of funding from the Ministry of Finance to the province. The meeting helped to identify on-granting mechanism as a potential component of the benefit-sharing arrangements.</p> <p>The Provincial Treasury Agency (BKAD) and provincial development planning agency (BAPPEDA) discussed the appropriate benefit sharing arrangement for East Kalimantan, suggesting that the FCPF might use the on-budget off-treasury mechanism for benefit-sharing arrangements so that it will avoid bureaucracy procedures from central to province and/or district government.</p> <p>Although it is stated that the system for benefit sharing non-carbon benefits have been discussed at national level, the document needs to include information that allows to support that affirmation.</p> <p>It is included a roadmap for the completion of the Benefit Sharing Mechanism (Section 15.2).</p> <p>It should be better informed how the development of the BSP is related and is being developed as part of a consultative, transparent and participatory process, reflecting inputs receives from relevant stakeholders (including broad community support by affected Indigenous Peoples).</p> <p>The document doesn't includes a Plan to carry out consultations with stakeholders regarding the BSP, informing how it will be disclosed in a form understandable to the stakeholders of the ER Program.</p> <p>This indicator is considered as not applicable at this stage</p>	
<p>C 32 The implementation of the Benefit-Sharing Plan is transparent</p>	
<p>Ind 32.1 Information on the implementation of the Benefit-Sharing Plan is annexed to each ER Program monitoring report and interim progress report and is made publicly available [16.1]</p>	<p>N.A</p>
<p>Only applicable at the time of verification.</p>	
<p>C 33 The benefit-sharing arrangement for the ER Program reflects the legal context</p>	
<p>Ind 33.1 The design and implementation of the Benefit-Sharing Plan comply with relevant applicable laws, including national laws and any legally binding national obligations under relevant international laws</p> <p>[Description of the legal context of the benefit-sharing arrangements 16.3]</p>	<p>NO</p>

The Benefit-Sharing Plan (BSP) is not yet drawn up. During the mission, the TAP learnt that the central government is consolidating at this moment a legal instrument which is to have the form of a Presidential Decree on the institutional and governance structure for the flow of carbon proceeds and the different institutions involved.

The Advanced Draft ER-PD outlines key aspects of the institutional and governance structure. of the BSP is to rely on the Environmental Fund Management Agency (BPDH) which was legally created in 2017, though the BPDH is not yet operational. BPDH is expected to adopt international fund management rules and be equipped with a steering committee to give programmatic guidance. It is not wholly clear who will have direct access to BPDH. The Advanced Draft ER-PD states that “entities” will be able to access the fund through submitting “concept notes”. The graph in chapter 15 seems to suggest, however, that such concept notes will be developed exclusively by the Regional Government. The latter view was confirmed during the mission.

Ultimately, the ER Program beneficiaries – the Advanced Draft ER-PD lists Government Agencies, Villages/Communities, forest management units (FMUs), private companies, and social and research organizations – will receive funding on loan (private companies) or grant (all others) basis.

The Advanced Draft ER-PD states that the mechanism for distributing is not yet established. From the MF point of view, the BSP as a whole does not yet need to be fully established. However, as the BSP is an essential element of the ER Program with implications across the overall architecture, key design principles should be readily available.

While there is initial clarity on the envisaged institutional infrastructure, the Advanced Draft ER-PD does not provide sufficient information on

- Identification and selection of beneficiaries (in particular: which villages/communities will be included and through what means; which private companies);
- Principles for disbursements (grants provided at cost basis or pro rata of ERs achieved, incentive elements, or other);
- Operational design (how and when can beneficiaries access funds); or
- Development of the BSP, its adoption process, and the modalities for ER Program stakeholders to participate in the development and to approve the BSP terms. Ultimately, from a legal perspective, it is the BSP which defines the terms for the type of contribution of stakeholders and the type of reward they will receive in exchange (provided results are achieved). Equally, where there is a negative impact (e.g. reduced access despite a valid tenure title), the BSP sets the terms for the compensation due. Hence, there needs to be a process for each contributing (or impacted) stakeholder to “sign up” to the BSP. Such a sign-up may be done through a formal contract or through other means, e.g. for a village, this may be done through a resolution by the village governance body.

The Advanced Draft ER-PD Draft restricts the list of potential beneficiaries to those adat communities that have obtained formal recognized status by the Government. As explained above (Indicator 28.2), it will be important to clarify what this means for non-recognized adat communities, how many people/communities are at risk of exclusion, to what extent such communities may still be covered by the BSP, and how the ER Program secures that de facto contributions (which give rise to ERs) will still be rewarded. The installation of a reserve fund (or set-aside) for de-facto contributions may be opportune. So far, the Advanced Draft ER-PD fails to make these clarifications.

This is considered as a major non-conformity as the evidence provided to prove conformity is insufficient.

C 34 Non-Carbon Benefits are integral to the ER Program

Ind 34.1 The ER Program outlines potential Non-Carbon Benefits, identifies priority Non-Carbon Benefits, and describes how the ER Program will generate and/or enhance such priority Non-Carbon Benefits. Such priority Non-Carbon Benefits should be culturally appropriate, and gender and inter-generationally inclusive, as relevant

YES

<p>[Outline of potential Non-Carbon Benefits and identification of Priority Non-Carbon Benefits 17.1 in the reviewed ER-PD of 15 January 2016]</p>	
<p>The Advanced Draft ER-PD identifies non-carbon benefits, in addition to emission reductions actions and investments to reduce deforestation and degradation in East Kalimantan, that the ER Program will result in.</p> <p>The expected non-carbon benefits and priority non-carbon benefits are described in Table 16.1. Such non-carbon benefits include above all the improvement of livelihoods of forest-dependent communities, and the protection of ecosystem services, including: biodiversity, improved water quality, soil fertility, flooding and erosion control, and habitats of game and fish.</p> <p>Another key expected benefit of the ER Program is improved forest governance which will lead to reduced land conflict, and to an improved investment climate. Priority non-carbon benefits, are those that are a direct outcome of reduced deforestation, such as the preservation of ecosystem services; and those that are aligned with government and local priorities and are therefore integral to the program design, such as those linked to improved forest governance and livelihoods.</p>	
<p>Ind 34.2 Stakeholder engagement processes carried out for the ER Program design and for the readiness phase inform the identification of such priority Non-Carbon Benefits</p> <p>[Description of stakeholder consultation process 5.1]</p>	<p>NO</p>
<p>Although it is stated that the system for benefit sharing including non-carbon benefits have been discussed at national level, the document needs to include information that allows to support that affirmation.</p> <p>There is no information on how the identification of the Non-Carbon Benefits is related with the stakeholder engagement process.</p> <p>It is suggested to include information about how Non-Carbon benefits were identified and informed, opinions collected and following steps to be carried out.</p> <p>This is considered as a minor non-conformity given that the provided evidence is insufficient but can be readily attended.</p>	
<p>C 35 The ER Program indicates how information on the generation and/or enhancement of priority Non-Carbon Benefits will be provided during ER Program implementation, as feasible.</p>	
<p>Ind 35.1 The ER Program proposes an approach utilizing methods available at the time to collect and provide information on priority Non-Carbon Benefits, including, e.g., possibly using proxy indicators. If relevant, this approach also may use information drawn from or contributed as an input to the SIS</p> <p>[Approach for providing information on Priority Non-Carbon Benefits 17.2]</p>	<p>YES</p>
<p>The document states that SIS REDD+ will include evidence-based information on non-carbon benefits and will include both quantitative and qualitative data collection, and will be based on consultations with target stakeholders.</p> <p>Information can be compared to the baseline information collected as part of the SESA. Information on non-carbon benefits will be collected on a regular basis, will be presented in regular progress reports, and will be made available to the public. An initial list of indicators is presented in Section 16.2.</p>	
<p>Ind 35.2 Information on generation and/or enhancement of priority Non-Carbon Benefits will be provided in a separate annex to each ER Program monitoring report and interim progress report, and will be made publicly available</p>	<p>N.A</p>

Only applicable at the time of verification.	
C 36 The ER Program Entity demonstrates its authority to enter into an ERPA and its ability to transfer Title to ERs to the Carbon Fund	
<p>Ind 36.1 The ER Program Entity demonstrates its authority to enter into an ERPA with the Carbon Fund prior to the start of ERPA negotiations, either through:</p> <ul style="list-style-type: none"> i. Reference to an existing legal and regulatory framework stipulating such authority; and/or ii. In the form of a letter from the relevant overarching governmental authority (e.g., the presidency, chancellery, etc.) or from the relevant governmental body authorized to confirm such authority. <p>[Authorization of the ER Program 18.1]</p>	NO
<p>The Advanced Draft ER-PD states that the ERPA may “potentially” be signed by the Ministry of Finance. As the possible legal basis, the Advanced Draft ER-PD lists Law No 17 of 2003 on State Finances, Regulation No 28 of 2015, as well as Article 32 of Government Regulation No. 10 of 2011 on the Foreign Loan and Grant Procedure. Law No 17 of 2003 gives the Minister of Finance the authority to “conduct international agreements in the field of finance”; Government Regulation No 10 of 2011 gives authority to conclude “loans” and “grants”. The author could not verify Regulation No 28 of 2015. For the other two, however, it is not self-evident that the authority to sign falls to the Ministry of Finance. This omission is recognized in the Advanced Draft ER-PD, and preparations are under way to receive a legal opinion or other authoritative advice in September 2018, and as such is deemed to be resolved soon. As of now, the indicator is considered as not met.</p> <p>This is considered as a minor non-conformity given that the provided evidence is insufficient but can be readily attended.</p>	
<p>Ind 36.2 The ER Program Entity demonstrates its ability to transfer to the Carbon Fund Title to ERs, while respecting the land and resource tenure rights of the potential rights-holders, including Indigenous Peoples (i.e., those holding legal and customary rights, as identified by the assessment conducted under Criterion 28), in the Accounting Area. The ability to transfer Title to ERs may be demonstrated through various means, including reference to existing legal and regulatory frameworks, sub-arrangements with potential land and resource tenure rights-holders (including those holding legal and customary rights, as identified by the assessments conducted under Criterion 28), and benefit-sharing arrangements under the Benefit-Sharing Plan</p> <p>[Transfer of Title to ERs 18.2]</p>	NO
<p>As further explained above (Indicator 28.3), the Advanced Draft ER-PD fails to explain the nature of ER title under Indonesian law, and the relevance of land tenure holdings, including customary land tenure holdings, for the generation and/or allocation of such rights.</p> <p>Should it be the case that Indonesian law does not define ER title per se, it would be important to explore to what extent Indonesian law provides mechanisms – e.g. under private law – that have functional equivalence and secure that (a) land tenure rights are protected, (b) that emission reductions achieved can be transacted to the Carbon Fund, (c) that REDD+ contributions will be rewarded and benefits shared among contributors, and (d) that the claim to the transacted ERs is exclusive (i.e. there is legal protection against the program entity or any participant raising a competing claim or selling ER title to a third party).</p> <p>It is recommended, in this context, to verify that the ERPA obligation to transfer title is binding and enforceable under Indonesian law and to explore options how the program entity can secure compliance with the transfer obligation by ER Program stakeholders/contributors. As mentioned under Indicator 33.1, formal affiliation of stakeholders with the ER Program and the transfer obligation of ER title may be achieved via the Benefit Sharing Plan.</p>	

The Advanced Draft ER-PD refers to the future Benefit Sharing Plan, in whose context “sub-arrangements” with REDD+ stakeholders, among them indigenous communities (see Annex 15), may be concluded, which in turn could regulate the transfer of carbon title.

This may be a viable way forward. While it is acknowledged that the Benefit Sharing Plan may not yet need to be fully designed at the ER-PD stage, there should be more clarity on the principles and the scope of any sub-arrangements along with clear provisions on who qualifies and what the terms would be for the transfer of title to ERs. Annex 15 to the ER-PD provides a list of stakeholders, yet the process for the establishment of sub-arrangements remains opaque.

Moreover, as explained in Indicator 33.1, concerns remain vis-à-vis indigenous communities that have not yet been recognized by the Government, and their relevance in the context of title to ERs.

A separate concern relates to the existing emission reduction projects within the Accounting Area (Berau, Satuan Tugas) and/or the existing ecosystem restoration licenses (IUPHHK-RE). The respective projects/licenses may have acquired an exclusive or competing claim to generate ERs.

It is understood, in this context, that MoEF Regulation No 70/2017 laid down new procedural rules for the establishment of “REDD+ implementers” and that existing projects must comply with these rules (as of 2019) in order to maintain recognition. While the regulation does not seem to include any instructions on ER titles, the ER-PD needs to clarify how the ER Program will respond, when current or future projects/permit holders request recognition as REDD+ implementers and when they transact ER-titles.

It would be important to clarify, in this context, whether “REDD+ nesting” approaches are envisaged and, if negative, what the risks are for the ER Program to deliver the ER titles for the entire Accounting Area.

This is considered as a major non-conformity given the relevance of the involved shortcomings related the BS arrangements, existing ER projects within the accounting area, and the unrecognized Adat communities.

Ind 36.3 The ER Program Entity demonstrates its ability to transfer Title to ERs prior to ERPA signature, or at the latest, at the time of transfer of ERs to the Carbon Fund. If this ability to transfer Title to ERs is still unclear or contested at the time of transfer of ERs, an amount of ERs proportional to the Accounting Area where title is unclear or contested shall not be sold or transferred to the Carbon Fund
[Transfer of Title to ERs 17.2]

NO

The Advanced Draft ER-PD does not provide any information on the timing of ER title transfer. Indeed, the concept of ER title under Indonesian law remains unclear (see Indicator 36.2). Indicator 36.3 is, therefore, deemed not met at this stage but the information is deemed to be provided soon.

This is considered as a minor non-conformity given that the provided evidence is insufficient but can be readily attended.

C 37 Based on national needs and circumstances, the ER Program works with the host country to select an appropriate arrangement to avoid having multiple claims to an ER Title.

Ind 37.1 Based on national needs and circumstances, the ER Program host country has made a decision whether to maintain its own comprehensive national REDD+ Program and Projects Data Management System, or instead to use a centralized REDD+ Programs and Projects Data Management System managed by a third party on its behalf. In either case of a country’s use of a third party centralized REDD+ Programs and Projects Data Management System, or a country’s own national REDD+ Programs and Projects Data Management System, the indicators below apply
[Data management and Registry systems to avoid multiple claims to ERs 18.2]

YES

<p>Indonesia has made the decision and opted for a national data management system. The system – called “National Registry System” (accessible at http://ditjenppi.menlhk.go.id/srn/) – is partially established and operational. It is meant to become the central platform for data and information management concerning both climate change adaptation and mitigation action. REDD+ activities are integrated in the system.</p>	
<p>Ind 37.2 A national REDD+ Programs and Projects Data Management System or a third party centralized REDD+ Programs and Projects Data Management System needs to provide the attributes of ER Programs, including:</p> <ul style="list-style-type: none"> i. The entity that has Title to ERs produced; ii. Geographical boundaries of the ER Program or project; iii. Scope of REDD+ activities and Carbon Pools; and iv. The Reference Level used. <p>An ER Program for the Carbon Fund should report its activities and estimated ERs in a manner that conforms to the relevant FCPF Methodological Framework C&Is</p> <p>[Data management and Registry systems to avoid multiple claims to ERs 18.2]</p>	<p>YES</p>
<p>At this moment, the National Registry System provides only data on ‘responsible party/-ies’, the location (without geographical boundaries) and two ER values (claimed and verified). It does not provide precise geographical information, details on carbon pools and REDD+ activities or the reference level.</p> <p>However, MoEF Regulation No 70/2017 foresees additional functions of the National Registry System, including the registration of information on “location, approach and REDD+ tools” as well as information on the reference level, MRV reporting, implementation of Social and Environmental Safeguards (integrated with Safeguards Information System/SIS), implementation costs and source of costs, supporting activities, and contribution to Indonesia’s Nationally Determined Contribution (NDC).</p> <p>While the indicator is deemed met, it is recommended that the final ER-PD clearly states which of the functions are already operational and when the other functions will become operational.</p>	
<p>Ind 37.3 The information contained in a national or centralized REDD+ Programs and Projects Data Management System is available to the public via the internet in the national official language of the host country (other means may be considered as required).</p> <p>[Data management and Registry systems to avoid multiple claims to ERs 19.2]</p>	<p>YES</p>
<p>The website is available and easily accessible (including in the local language).</p>	
<p>Ind 37.4 Administrative procedures are defined for the operations of a national or centralized REDD+ Programs and Projects Data Management System; and an audit of the operations is carried out by an independent third party periodically, as agreed with the Carbon Fund</p> <p>[Data management and Registry systems to avoid multiple claims to ERs 18.2]</p>	<p>NO</p>
<p>The website of the National Registry System explains the steps for registering information by proponents and verifying this information (at the registration as well as at each verification step) by the registrar (“Secretariat”), but administrative procedures for the operations of REDD+ programs are not available. Audit information is also not available.</p> <p>This is considered as a minor non-conformity given that the provided evidence is insufficient but can be readily attended.</p>	
<p>C 38 Based on national needs and circumstances, ER Program host country selects an appropriate arrangement to ensure that any ERs from REDD+ activities under the ER Program are not generated more than once; and that any ERs from REDD+ activities under the ER Program sold and transferred to the Carbon Fund are not used again by any entity for sale, public relations, compliance or any other purpose</p>	

<p>Ind 38.1 Based on national needs and circumstances, the ER Program host country has made a decision whether to maintain its own national ER transaction registry, or instead to use a centralized ER transaction registry managed by a third party on its behalf</p> <p>[Data management and Registry systems to avoid multiple claims to ERs 18.2]</p>	<p>YES</p>
<p>The Advanced Draft ER-PD clarifies that the decision to maintain a national ER transaction registry has been made.</p>	
<p>Ind 38.2 The national or centralized ER transaction registry reports ERs for the Carbon Fund using the accounting methods and definitions described above in the MF</p> <p>[Data management and Registry systems to avoid multiple claims to ERs 19.2]</p>	<p>N.A.</p>
<p>Regulation No 70/2017 appears to guarantee that the accounting agreed in the ER-PD/MF synchronizes with the registry reports to be entered into the National Registry System.</p> <p>Indonesia will need to show how it synchronizes projects and programs that occur within the same boundaries. Will the two projects registered for East Kalimantan be deregistered once the ER Program is registered, or will they be nested within the program. If the latter, the final ER-PD should explain how double-counting will be avoided. This relates to the double counting of ERs (double issuance) as well as to the double counting of contributions (double monetization). If projects are nested, the identity of stakeholders involved in the project and/or the ER Program will need to be registered in order to avoid double counting of contributions.</p>	
<p>Ind 38.3 An independent audit report certifying that the national or centralized ER transaction registry performs required functions is made public.</p> <p>[Data management and Registry systems to avoid multiple claims to ERs 19.2]</p>	<p>N.A.</p>
<p>Not yet specified</p>	
<p>Ind 38.4 Operational guidance exists, or is in advanced stage of preparation, that clarifies the roles and responsibilities of entities involved in the national or centralized ER transaction registry, as well as rules for operation of the registry.</p> <p>[Data management and Registry systems to avoid multiple claims to ERs 19.2]</p>	<p>N.A.</p>
<p>Operational guidance outside MoEF Regulation No 70/2017 – which defines what needs to go into the National Registry System, but does not identify the process – and the above-mentioned description of registration steps (Indicator 37.4) is not available.</p>	

Annex 1 to the TAP technical assessment