

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

(interim, September 10, 2009, from Program Document FMT 2009-1, Rev. 3)

**Review of R-PP of (fill in country name): GHANA**

**Reviewer (fill in): Juergen Blaser coordinating a TAP Review Team of 6 members**

**Date of review (fill in): 18 October 2009**

**DRAFT**

### **Guidelines for Reviewers:**

- 1) FCPF REDD Country Participant R-PPs will be reviewed and assessed by the FCPF Participants Committee, the FCPF's governing body, taking TAP comments into account. External (Technical Advisory Panel or other) and Bank reviewers may provide recommendations on how a draft R-PP could be enhanced, using this template on a pilot basis until a process is approved by the PC.
- 2) One set of criteria should be used for review: specific standards each of the current 6 components of an R-PP should be met.
- 3) Your comments will be merged with other reviewer comments (without individual attribution) into a synthesis document that will be made public, in general, so bear this in mind when commenting.
- 4) Please provide thoughtful, fair assessment of the draft R-PP, in the form of actionable recommendations for the potential enhancement of the R-PP by the submitting country. A REDD Country Participant would be allowed three submissions of an R-PP to the PC for consideration.

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

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

## **Summary of Review and Recommendations**

The TAP team congratulates the Government of Ghana for preparing this draft version of the R-PP and for having dedicated considerable time and efforts in the REDD Readiness process. The comments made in this External Review Template are expected to provide guidance to the Ghana REDD team in further developing their R-PP prior to the formal submission to the FCPF Participants

Committee. The TAP remains available to continue discussions with the Government of Ghana on how to address the assessments and recommendations provided in the present document.

Among the **strengths** of the submitted Draft R-PP are the clear outline of the R-PP and the willingness of the authorities to develop a wider REDD-plus strategy. The document demonstrates the full ownership of the REDD-process by the Forestry Commission (GFC) and its national REDD-plus Secretariat. The document submitted is in many parts complete and contains a number of useful explanations in the annexes, though maps on core REDD-plus areas and other illustration material is missing in the annexes.

The full implementation of the proposed R-PP will have interesting prospects for the sustainable management of the forest reserves and offer prospects to address the wider landscape carbon management in off-reserve areas. While the R-PP is fairly comprehensive in general terms, it can be improved by being more specific in assessing the potential of REDD-plus in Ghana, as outlined in the some of the commented components in the TAP report. The R-PP is particularly detailed in making reference to capacity and knowledge gaps, and makes clear references to the issue of participation of all stakeholders in decision-making and implementation of REDD (without however going into further details, e.g. in respect to traditional landholders). It is understood that the solution package to solve key issues on land and tree holding in forest reserve areas and REDD-plus remedies in off-reserve lands should be part of the work program in the Readiness phase and that progress should be made according to deliverables that need to be obviously stated in the R-PP.

The Ghana R-PP is innovative and will have important demonstration elements for other countries in the region. Ghana has undertaken considerable initial consultations efforts regarding REDD-plus with other government agencies, environmental NGOs, academics, decentralized units and – to a certain extent – with traditional leaders, and has submitted an R-PP that reflects a noteworthy amount of work and thought. The R-PP presents a set of comprehensive TORs for multi-stakeholder and consultancy efforts designed to increase the understanding of deforestation and degradation as well as the enhancement of sink agenda in the country. In the view of the TAP, a fully elaborated R-PP will help to improve understanding of REDD and other environmental issues among a wide range of stakeholders in the country, among other activities.

The TAP identified in its detailed report a number of **issues** that should be addressed in the further preparation of the R-PP. Overall, a couple of general observations can be made as follows:

- **Demonstrate clear leadership and needed convening power to implement REDD-plus.** While the ownership of the readiness process by the Forestry Commission is clearly recognizable, the R-PP should noticeably describe Government ownership and leadership for the REDD process at a higher level, as REDD, and in particular REDD-plus, is extremely inter-sectoral due to the variety of drivers of deforestation and forest degradation and the nature of measures to be undertaken to implement a REDD-plus strategy. The R-PP should clearly distinguish between the operational leadership function of the FC and the more strategic and policy leadership that has to be provided at a higher level.
- **Demonstrate ownership to the REDD-plus formulation and implementation process by traditional leaders.** While a considerable effort has been made at the level of initial consultation on REDD-plus, it is not clear to the TAP if traditional leadership has been involved in the R-PP process in a meaningful manner. A full involvement of them will enable the promotion of innovative traditional land-use practices and developing adequate norms and by-laws at the District Assemblies to support a future REDD-plus approach. Considering the land tenure system in Ghana, the involvement of traditional leaders is a key prerequisite for the development of a comprehensive REDD-plus strategy.

- **Make the document more focused to the specific context of Ghana.** In many of its components, the R-PP remains relatively general and superficial about the issues to be described and the activities to be proposed. As there have been many programmes and initiatives being undertaken in the past in the forestry and agricultural sectors in Ghana, and the lessons learnt from them (e.g. what worked, what did not work at the level of forest-related policy implementation) should be integrated in the R-PP analysis and in its various components. The draft R-PP presented significant gaps in assembling information about major programmes and initiatives existing in the country and knowledge available from them. Various pilot activities to tackle deforestation and forest degradation are implemented (by civil society actors) on the ground, for instance, which could generate important lessons learned for the REDD Strategy to be implemented.
- **Address precision and specificity (of the Ghana context) to the various components of the R-PP.** The document should be more precise when describing the REDD-plus strategy options (e.g. where REDD/REDD-plus should be applied? Who are the main actors? How will REDD-plus be realized?). The reference scenario needs further precision, e.g. there is no specific plan or designated methodology proposed (national level baselines, sub national strategic approaches). The R-PP should not only describe a MRV system in general, but propose a monitoring design that is linked to the REDD-plus policy strategy proposed in Component 2. Overall, the R-PP should be made more specific and unique to the Ghana context.
- **Reflect further on the national REDD Implementation arrangements.** To implement REDD-plus in Ghana, there seems to be a rather complex institutional environment with overlapping and unclear roles and responsibilities which potentially create conflicts in respect to competency and authority. A process to achieve readiness will be difficult to steer without a clear assignment of authority for REDD-plus at the appropriate level. The TAP noted that the institutional environment in Ghana is complex. In this regard, the TAP questions the leadership of the REDD-plus Steering Group and the adequate representation of sector Ministries and stakeholders (including traditional authorities). The R-PP should clarify who will play the role in decision-making about REDD-plus and who will be at in a consultative role. While it is understood that the Forestry Commission board is a multi-stakeholder body, the TAP questions if it is representative enough to convene fully respected decisions on REDD-plus. The articulation of REDD-plus in the National Climate Change Committee and the Natural Resource and Environment Advisory Council also needs to be further clarified.

The more detailed assessments and recommendations on the 6 components of the Draft R-PP of Ghana are presented beneath, according to the external review template.

## Standards to be Met by R-PP Components

(from Program Document FMT 2009-1, Rev. 3:)

### Component 1. Organize and Consult

#### Standard 1a: National Readiness Management Arrangements

The cross-cutting nature of the design and workings of the national readiness management arrangements on REDD, in terms of including relevant stakeholders and key government agencies beyond the forestry department, commitment of other sectors in planning and implementation of REDD readiness;

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

The R-PP of Ghana subscribes to the REDD-plus agenda that includes not only *reducing emissions from deforestation and forest degradation; but also the role of conservation, sustainable management of forests and enhancement of forest carbon stocks*. It is the view of the submitting agency that REDD-plus would be best suited to respond to the challenges of climate change and to align with ongoing forest sector reform work in Ghana.

To organize and consult on readiness through a REDD-plus approach will be more challenging than applying a more narrow RED(D) approach. The R-PP thus emphasizes on the management arrangements and developed a complex institutional scenario. While the intention to get a broad ownership for REDD-plus is clearly recognizable from the R-PP, the TAP questions if the proposed institutional set-up, as outlined in Figure 2, can be made functional in practice. At a first glance, it seems to be a rather complex institutional set-up with unclear roles and responsibilities, which potentially might create conflicts in respect to competency and authority. In the TAP's view, the process to achieve readiness will be difficult to steer without a clear assignment of authority for REDD-plus at the appropriate level. The TAP noted that the institutional environment in Ghana is indeed complex (a multitude of ministries and services; local chiefs and smallholders as forest land owners; various industry and development boards as land users; an active civil society movement, etc). Examples of such complexity are:

- The National Climate Change Committee, a multi-stakeholder committee under the auspices of the Ministry of Environment, Science and Technology (MEST), which is, according to the document, developing national strategies on climate change mitigation and adaptation, including forests. In this regard, it has to be noted that the reporting agency to the Parliament on climate change is MEST.
- The Ministry in charge for REDD-plus is however the Ministry of Lands and Natural Resources (MLNR) which entrusted the role of consulting on and coordinating and implementing of REDD-plus to its Forestry Commission, which created a Climate Change Unit as the National REDD-plus Secretariat under its auspices.
- Within MLNR (besides the Forestry Commission and linked units to it, such as the Wildlife Division; and the Timber Industry Development Division) there are other units that also play a crucial role in a future REDD-plus strategy, such as *inter alia* the Lands Commission, the Survey Department, the Office of the Administrator of Stool Lands, the Land Valuation Board and the Land Title Registry Department.
- Other Ministries besides MEST and MLNR, e.g. Ministry of Finance and Economic Planning (MoFEP), the Ministry of Food and Agriculture (MoFA), the Ministry of Local Government and Rural Development (MLG) and, as proposed by some TAP members, the Ministry of Chieftaincy and Culture (MCC) and the Ministry for Women and Children Affairs (WWCA) also have their stake in the development of national mitigation strategy in REDD-plus. The question arises if the Forestry Commission, as the ultimate response for REDD-plus, can develop the needed convening power to implement the R-PP, considering already its relative weak role within the complex ministerial structure of MLNR and its low hierarchical position that might make it difficult to mainstream REDD-plus against the legitimate interests of other ministries and other parties (e.g.

the promotion of non-shade cocoa plantations in the high forest zones of Ghana).

- Moreover, stakeholders outside the governmental structure are key for successful REDD implementation. While the TAP recognizes a satisfactory overall initial consultation process, the TAP is of the view that traditional leadership (local chiefs, landowners, stools) are NOT sufficiently included in the management arrangements on REDD. The view of the TAP is that the complex land and tree tenure system in Ghana makes it an imperative to closely link with local landholders since most lands in the country are held under the traditional tenure system. This element needs strengthening throughout the current R-PP document.
- The MLNR has set up the National REDD Steering Committee (NRSC) to bring together all stakeholders, but this group has a limited function as an advisory body. It remains unclear who at the end will be able to take the key decisions to prepare the pathway for REDD-plus (e.g. on the REDD strategy options as outlined in Annex 2b or on clarifying the carbon rights).

#### Recommendations:

- Consider strengthening of the management arrangements by better defining the role of the Natural Resource and Environmental Advisory Council (NREAC), its technical committee, the role of MLNR as a whole and the Forestry Commission in particular. Simplify the relationships between the bodies. Consider if the NREAC could take a more responsible role for clarifying the role of the many institutions and mandates involved and on reporting requirements.
- Explain the role/include or explicitly exclude in the management arrangements other Ministries that are not mentioned in the R-PP (e.g. the Ministry of Chieftaincy and Culture; the Ministry for Women and Children's Affairs) as well as relevant other technical services that are working under the MLNR. Reflect on the role of the National Development Planning Commission that to some extent is responsible for integration all development initiatives to promote poverty reduction. Reflect on the role of the Ghana Cocoa Board (COCOBOD) that has major influence through cocoa production over almost the entire high forest zone and Shea-nuts production in the savanna zone.
- Argue on the role of the National REDD-plus Secretariat within the FC as the main implementation body. Develop the pros and cons of positioning the main implementation body at such low convening power level in the National Readiness Management Arrangement. There is also a need to define what functions and legal mandates all proposed bodies (listed in Figure 2) should have with respect to REDD-plus.

➔ The standard 1a has yet not been fully met.

#### Standard 1b: Stakeholder Consultation and Participation

Ownership, transparency, and dissemination of the R-PP by the government and relevant stakeholders: Inclusiveness of effective and informed consultation and participation by relevant stakeholders, assessed in the following ways:

- i. the consultation and participation process for R-PP development thus far<sup>3</sup>, the extent of ownership within government and REDD coordinating body, as well as in the broader national stakeholder community; and

<sup>3</sup> Did the R-PP development, in particular the development of the ToR for the strategic environmental and social assessment and the Consultation and Participation Plan, include civil society, including forest dwellers and Indigenous Peoples representation? In this context the representative(s) will be determined in one of the following ways: (i) self-determined representative(s) meeting the following requirements: (a) selected



the Consultation and Participation Plan included in the R-PP (which looks forward in time); and the inclusion of elements in the R-PP that adequately document the expressed concerns and recommendations of relevant stakeholders and propose a process for their consideration, and/or expressions of their support for the R-PP.

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

In general terms, the consultation and participation process proposed is satisfactory. The time allocated for stakeholder consultation and participation in the preparation of this R-PP was obviously too short and condensed. Considering the short period, the team has done a good job of engaging across the country and across the governmental and civil society organizations.

What has not fully achieved yet in the TAP's view is to engage traditional leadership and forest communities in the R-PP process in a meaningful manner. Under Institutional Arrangements for Communication and Participation on REDD-plus, there is need to better involve the 10 Regional House of Chiefs and the District Environmental Committees. This will better enable the promotion of innovative traditional land-use practices and developing adequate norms and by-laws at the District Assemblies to support a future REDD-plus approach. Considering the land tenure system in Ghana, the involvement of traditional leaders is a key prerequisite for the development of a comprehensive REDD-plus strategy.

Under Key Stakeholders, the participation should be broadened to be more gender and culturally sensitive by including statutory and recognized women's groups, the National Youth Council and other recognized youth groups. The Cocoa Research Institute of Ghana (CRIG) should also be included alongside the Ghana Cocoa Board since they are the authorities that influence the current trend in the cocoa growing systems (that is not very conducive under a REDD-plus approach).

The consultation process as the whole - after inclusion of the above proposed additional proposals - is sufficient for the preparation of a REDD-plus strategy. However, there is a need not only to inform and exchange on REDD-plus in general terms, but also to emphasize in the consultations on the expected roles of the various stakeholders and the policy and legal implications that such roles imply in the future arrangements for REDD-plus implementation (section 2c of the R-PP).

Worthy of note is the use of the term "indigenous people" in the document which indeed is not common for Ghana. The term indigene or indigenous people is not acceptable in Ghana and is highly objectionable to the traditional authorities and land-owning communities. Thus, as an example, under the Working Group on ecosystem friendly cocoa production, indigene/migrant relations should be replaced with land-owners/tenant migrant.

**Recommendations:**

- Address the recommendations made in the comments above.
- Consider in the further preparation of the R-PP formulation process between now and March 2010 to hold a separate and in-depth consultation process with the National House of Chiefs, the Regional Houses of Chiefs and a selection of forest communities and adapt the R-PP according to

through a participatory, consultative process; (b) having national coverage or networks; (c) previous experience working with the Government and UN system; (d) demonstrated experience serving as a representative, receiving input from, consulting with, and providing feedback to, a wide scope of civil society including Indigenous Peoples organizations; or (ii) Individual(s) recognized as legitimate representative(s) of a national network of civil society and/or Indigenous Peoples organizations (e.g., the GEF Small Grants National Steering Committee or National Forest Program Steering Committee).

the main recommendations received from this process.

- In the consultation, discuss further roles and responsibilities and possible policy and legal implications of stakeholder involvement in a future REDD-plus implementation scheme.
- Identify through the upcoming consultation process and list in the R-PP those innovative traditional norms and practices that could easily be supported with technology to make a positive impact on enhancing carbon stocks.

→ The standard 1b has yet not been fully met, further consultation steps are needed.

## Component 2. Prepare the REDD Strategy

**Standard 2.a: Assessment of Land Use, Forest Policy, and Governance:** A completed assessment is presented that identifies major land use trends, direct and indirect deforestation and degradation drivers in the most relevant sectors in the context of REDD, and major land tenure and natural resource rights and relevant governance issues. It documents past successes and failures in implementing policies or measures for addressing drivers of deforestation and forest degradation, and identifies significant gaps, challenges, and opportunities to address REDD. The assessment sets the stage for development of the country's REDD strategy to directly address key land use change drivers.

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

This section sufficiently well describes the main drivers of deforestation and forest degradation (over capacity, policy/market failures, population pressure, wood energy consumption, high demand for timber/chainsaw logging, slash and burn agriculture, poor agricultural technology). It also identifies disincentives to custodianship of trees off-reserves and introduction of new 'full sun' cocoa-varieties that are not consistent with REDD Principles. It highlights the main issues that need to be tackled and in this regard, the matrix provided in Table 1 is quite useful.

The list proposed under initial activities/gaps in research on page 38 of the R-PP should be more specific as to what should be done. Some of the proposals for applied research priorities should be front-loaded into the current REDD-plus preparation process. E.g. one should by now expect that policy incentives to re-introduce shade tolerant cocoa should be explicitly proposed as a REDD-plus measure and not simply treated as a research gap.

Some particular land use practices, which have not been explicitly mentioned in the assessment of Land Use (2a), could be of particular interest for an Expert Group assessment, in particular:

- The rehabilitation of degraded traditional cocoa growing areas through shade tree/cocoa agroforestry systems;
- The formal recognition of fallow forest mosaics (secondary forest management) as a form of land-use practices from which non-timber forest products such as allanblackia nut, bushmeat, snails and mushrooms and medicinal plants are harvested. In such areas the possibility of payment for ecosystem services should also be further explored from a REDD-plus angle.
- The policy of having a 50m of fringing forest or buffer zone around rivers and streams should also be looked at. The possibility of rehabilitating degraded river banks under special national programs could be work to be considered in a REDD-plus approach
- Cashew farming is expanding in the transition zone and the northern savanna. This tree

farming system has a considerable potential for enhancing carbon stocks in an agroforestry systems (beyond CDM A/R).

The R-PP mentions various donor funded efforts in the sector but gives little historical context and current detail. The R-PP could be further improved by a more comprehensive review of the various projects and programs implemented over the past decade. The document is silent on outcomes of milestone investments such as the Forest Resource Management Project of the World Bank (FRMP, 1988-1997, 65 million US\$); the Natural Resource Management Programme (NRMP) and other related natural resource sector interventions over the past decades. The R-PP could also potentially benefit from the results of emerging piloted innovative land use projects labeled as Community Resource Management Areas (CREMAs), which have an established framework for establishing resource baseline, legal framework, permanency, tenure arrangements well as capacity enhancement of the local stakeholders for resource monitoring, reporting and verification.

An analysis of these broad sector support programs could provide significant value to the document especially as many of these large investments had rather limited success. As such the emphasis on the R-PP has got to be towards moving away from what has not been working in the sector and finding new institutional approaches for implementing REDD.

**Recommendations:**

- Address the recommendations made in the comments above, in particular, the lessons learnt from major sector initiatives implemented over the past 3 decades (what worked, what did not work and if so, why did it not work).
- Consider to include an Expert Working Group to assess the potential benefits from emerging piloted innovative land use labeled under Community Resource Management Areas (CREMAs)
- Consider changing the text under: *Low Carbon Agro Industrial Development* (page 41 of the Annex) as follows: “The aim is to identify policy options that will *reduce* the carbon footprint and *improve* pro-poor benefits of these innovations” (also in the TORs on page 52 of the annexes and on page 44 of R-PP document).

➔ The standard 2a has been partially met.



**Standard 2.b: REDD strategy Options:** Alignment of the proposed REDD strategy with the identified drivers of deforestation and forest degradation, and with existing national and sectoral strategies: the R-PP includes a summary of the emerging REDD strategy to the extent known presently, and of proposed analytic work (and, optionally, ToR) for assessment of the various REDD strategy options. This summary states:

- i. how the country proposes to address deforestation and degradation drivers in the design of its REDD strategy;
- ii. early estimates of cost and benefits of the emerging REDD strategy, including benefits in terms of rural livelihoods, biodiversity conservation and other developmental benefits;
- iii. socioeconomic, political and institutional feasibility of the emerging REDD strategy;
- iv. major potential synergies or inconsistencies of country sector strategies in the forest, agriculture, transport, or other sectors with the envisioned REDD strategy; and
- v. risk of domestic leakage of greenhouse benefits. The assessments included in the R-PP eventually should result in an elaboration of a fuller, more complete and adequately vetted REDD strategy over time.

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

The TAP noted that the REDD Strategy Options are clearly laid out, using an approach that includes (i) two national expert consultations, one on timber supply and the other one on carbon rights; (ii) four expert working groups (ecosystem friendly cocoa production; local market timber supply; charcoal and fuelwood and los carbon agro-industry development); and (iii) a challenge fund that allows civil society to participate with experimental actions to develop the REDD-plus strategy. While (i) and (ii) have been described in more detail with TORs in the Annex, the proposal on the challenge fund (iii) is not further described.

The proposal to develop the REDD strategy (which has been backed through the consultation process) proposes to structure the readiness planning through 2 overlapping thematic areas: Theme A that focuses on the traditional forest sector and Theme B that focuses on REDD approaches on non-forestry land. In addition to the proposed consultations and working groups, a number of so-called candidate strategies for REDD development are also outlined under chapter 2b and specified in more detail in Annex 2b-2.

What might be misleading in the main text of the R-PP are the titles of the two themes that are presented as the building blocks of Ghana's REDD-plus National Strategy (theme A is titled "Forest sector policy, legislation and governance"; theme B is titled "Agro-forestry and related carbon conserving activities"). Indeed, the strategy options should not just be limited to Policy/legal, Governance and Agro-forestry options. One TAP member, recognizing that all elements for a strategy are included in the overall REDD strategy options but that they are not easily recognizable in the text, proposed to re-organize the chapter along the lines of (i) Protection (Strict Nature Reserves, Catchments, Mountains etc), (ii) Production (forest reserves, planted forest, farm woodlots, Off-reserve forests, agro-forestry plantings) and (iii) Participation; he also proposed having a section of Policy, Legislation and Governance pertaining to the 3 Ps.

A number of specific observations have been made by TAP members, as follows:

- One of the expert working groups should also look at the Community Resource Management Areas concept being implemented by the Wildlife Division of the Forestry Commission, particularly the monitoring reporting and verification system, legal framework, permanence and

benefit –sharing schemes which has the potential to enhance carbon stocks.

- The working group on ecosystem friendly cocoa production should also look at the possibility of putting in place an intersectoral coordination mechanism or stakeholder platform involving the Cocoa Board, Forestry Commission, MLNR and Civil Society and farmers so as to ensure the adoption of recommended best practices that have the potential to enhance carbon stocks in cocoa production landscapes.
- In addition, one of the expert working groups should also look at reducing impact of logging in forest reserves as well as a system of assessing management effectiveness in on-reserve areas. This will contribute to reduce leakages.
- On fire, the issue is not just control but the judicious use of fire as a land management tool and this time within a REDD context. This is of particular importance in the transition and savanna zones.
- On charcoal it should be noted that charcoal making and its use emits carbon. The issues are therefore minimizing the use of charcoal, improving efficiency in carbonization of raw wood and sustainable wood supplies from managed sources. The working group on charcoal and fuelwood should demonstrate that charcoal production and use emissions are more than matched by sequestration through planned wood land or forest management. In addition, the use of sawdust as an alternative source of energy (briquettes) should also be considered by the working group on charcoal and fuelwood.

Finally, it is of the options of those TAP members that are very familiar with the developmental context of the Ghana Forest Sector, that the R-PP could be improved by acknowledging a number of on-going pilots in the country. In particular there are several private sector and civil society led efforts in creating pilots in Ghana. These include the cocoa sector, charcoal production, recovered wood in Volta Lake, Community Resource Management Areas, and reforestation. The document is silent on all of these pilots.

**Recommendations:**

- Address the various suggestions made above for improving the work of the expert groups
- Consider the various pilot projects ongoing in the country that could inform the REDD strategy options
- Describe further (through e.g. TORs) the proposed challenge fund. It is the understanding of the TAP that the challenge fund has not only be designed for projects on fire control.

➔ The standard 2b has been met, though improvements can be made.

**Standard 2.c: REDD implementation framework:** Describes activities (and optionally provides ToR in an annex) to further elaborate institutional arrangements and issues relevant to REDD in the country setting that identifies key issues, explores potential arrangements to address them, and offers a work plan that seems likely to allow their full evaluation and adequate incorporation into the eventual Readiness Package.

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

In general terms, the key requirements for implementation and ensuring accountability are rightly described and the priorities for the readiness preparation are logical and relevant. Nonetheless, what

is lacking is the link to the policy direction and the clarification of roles among existing and potential entities. This is equally important but not sufficiently described in the current version of the R-PP.

Readiness for REDD-plus will require an efficient national institutional framework. The R-PP would benefit from adding more detailed description of how Ghana is planning to address this issue. It is advised to establish clear responsibilities among the authorities participating in the REDD-plus processes regarding coordination, MRV and implementation. This should also include provisions in respect to sub-national involvement by regional authorities and local stakeholders.

There is, for example, no concrete institutional arrangements for REDD implementation described. Referring simply to the process of R-PP might not suffice at this stage. The document specifies that the full set of legal, institutional and economic structures for REDD-plus implementation will emerge from the process of analysis, review and testing during the REDD-plus readiness preparation phase. However, already in the initial stage of R-PP implementation, it would be important that the institutional structure outlined has not the ingredients for scramble for power and control between various ministries and agencies. As the R-PP rightly stated in chapter 2c, the integration of REDD-plus into the broader policy framework in Ghana is important. In order to achieve this, a high level secretariat with a certain level of executive power might be needed to guide the REDD-plus process. This important prerequisite for a successful REDD-plus implementation needs to be already considered in the R-PP stage. What we have learnt from the REDD processes so far, is that when attempting to operate REDD, which is extremely cross-cutting, at a low executive level, is fraught with extreme territorialism and competition between ministries and agencies. This should be absolutely avoided.

Furthermore there is not sufficient inclusion of cross sectoral expertise and key stakeholders outside the national government structures in place, e.g. traditional leadership institutions and civil society.

Under “Priorities of the REDD Readiness Preparation Phase” (summarized on pages 54-58) three steps are described: (1) Analysis, preparation and consultations; (2) Piloting and Testing; and (3) Becoming Ready. While the TAP recognizes that they are relevant one would expect that there would be specific issues already identified under “analysis”, “piloting & testing” and under “becoming ready”. One should reasonably expect clear concrete examples of possible pilots and where they could be situated (examples are protection forests, off-reserve forests, reserves with fringe communities, fire management pilots etc). The document, however, does not specify this.

**Recommendations:**

- Examine the creation of apex institution (a REDD secretariat at high level) in the R-PP stage, e.g. in the Office of the President for the purpose of directing and guiding the entire REDD process.
- Describe possible TORs of such a high level secretariat and other related committees and ensure a balance of cross sectoral expertise and reflect on the need of an overall multi-stakeholder policy making body that steers the overall REDD agenda.
- In general the Component of the R-PP should take into account the realities of Ghana at this stage and suggest some minimum implementation framework even if they would be interim pending refinement after COP 15.

➔ **The R-PP submission does not yet meet the standard 2c in terms of the functionality and inclusiveness of the institutional arrangements. It should be more precise in its activities according to the three-step approach proposed.**

**Standard 2.d: Assessment of social and environmental impacts:** The proposal includes a program of work for due diligence for strategic environmental and social impact assessment in compliance with the Bank's safeguard policies, including methods to evaluate how to address those impacts via studies, consultations, and specific mitigation measures aimed at preventing or minimizing adverse effects.

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

The text under 2d in the R-PP reads more like a textbook for social and environmental impact assessment than concrete measures undertaken to respect due diligence of the proposed R-PP work program in Ghana. The annex, however, besides being a repetition of the text of the R-PP, offers a certain degree of insight on what is intended to be done at the level of initial stakeholder and trade-off analysis. However, no clear indications and references are given in the document or in the annex on the consultative (field-based) stakeholder analysis and discussions which are intended to be conducted under this line of activity in the R-PP.

At this stage of the R-PP, the document should not just refer to "2-3 key REDD regions", but the authors should be prepared by now to identify and name them and to shortly describe the main social, economical and environmental challenges that need to be addressed.

The document (in the R-PP main text and the annexes) is often written in a way as: "*the consultant should..., or the consultant will...*". It should be understood that the outcome of the analysis is not a simple consultancy report, but needs to be understood as a core element of the REDD strategy. Indeed, the TAP has difficulties to understand if there is a full ownership by the relevant REDD-authorities for the assessment of the environmental and social impacts of REDD.

The document extensively refers to the strategic environmental and social assessment (SESA) as recommended by the FCPF governing body and the World Bank's social and environmental standards. Nonetheless, as the REDD-plus strategy is a Ghanaian approach, the R-PP should also be subjected to the Strategic Environmental Assessment (SEA) procedures developed by the Environmental Protection Agency of Ghana (EPA) to ensure national ownership and leadership.

**Recommendations:**

- Be more precise on the work that is intended to be conducted under this work program item of the R-PP. Specify in particular the consultative (field-based analysis) and indicate in which region of the country and under which circumstances this work will be conducted.
- Reformulate the chapter in a way that the ownership of the process is linked with the relevant Ghanaian authority that takes responsibility and leadership. Do not give the impression that "the consultant" is the main driver of the process.
- Make sure that the social and environmental impact assessments undertaken in the R-PP process are also subjected to the SEA procedures developed by the EPA of Ghana.
- Avoid unnecessary repetition of text between the main R-PP document and the annexes (this is in particular obvious in respect to item 2d, but can be found throughout the document).

➔ **The standard 2d has yet not been met.**

**Component 3. Develop a Reference Scenario**

**Standard 3 Reference scenario:** Present work plan for how the reference scenario for

deforestation, and for forest degradation (if desired), will be developed, including early ideas on feasibility of which methods to use (e.g., scenario of forest cover change and emissions based on historical trends in emissions and/or based on projections into the future of historical trend data), major data requirements and capacity needs, and linkages to the monitoring system design.

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

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

As outlined in its R-PP, Ghana basically must take initial and essential steps for both, the quantification of historic carbon stock changes for REDD relevant processes as well as for the development of future trajectories.

Overall, the R-PP presents a number of (clear) ideas for the development of a reference scenario, but does not refer to a specific plan and a designated methodology for each of the steps necessary to build the essential capacities. The link to the IPCC-GPG is established but the MRV implications in terms of national policy priorities and opportunities are not further elaborated.

Ghana's review of historical data on carbon stocks concludes that the existing inventory data are inappropriate to serve as a base to estimate carbon stocks for a reference scenario. Capacity needs are analyzed comprehensively and reveal significant capacity gaps (e.g. in the use of remote sensing and GIS techniques; methodology for carbon stock inventory; field measurement and data analysis) as well as for required equipment (including hard- and software and analysis instruments for field measurements and the collection; capacities to analyze and interpretation of data). The need for Ghana to invest significant resources for REDD readiness is clearly outlined and justified.

Recognizing that Ghana needs to close its capacity and data gaps, the country should consider using the roadmap presented in the R-PP in order to reach - through a stepwise approach - a full national system for REDD-plus accounting. Thanks to the principle of conservativeness<sup>4</sup>, basic-level capacities are sufficient to kick off early actions and to use a set of useful indicators to assess interim performance. Conservativeness in the context of REDD applies not only to single carbon pools that may be excluded from the reference scenario and the MRV process (as mentioned in Step 3-3.1 of the R-PP), i.e. *completeness* in terms of IPCC GPG reporting principles, but also to *accuracy*. This offers some further flexibility, as a country is welcome to participate in the REDD process even with incomplete and/or uncertain data.

The identification of key IPCC categories, defined as major sources of carbon stock change, will at least require basic data on forest carbon stocks that is not yet assessed for Ghana. That is because the impact of different drivers and processes on carbon losses and gains has to be quantified in order to set up an adequate national policy that provides the framework to target these key causes, and to

<sup>4</sup> The conservativeness principle has been introduced in the CDM afforestation and reforestation modalities, where it is prescribed that 'the baseline shall be established in a transparent and conservative manner regarding the choice of approaches, assumptions, methodologies, parameters, data sources,... and taking into account uncertainty'. In the context of REDD, it has been introduced as means to deal with uncertainties in estimates aiming to ensure that reductions in emissions or increases in removals are not overestimated. See also Grassi G., S. Monni, S. Federici, F. Achard<sup>1</sup> and D. Mollicone: [Applying the conservativeness principle to REDD to deal with the uncertainties of the estimates](#). Environmental Research Letters. September 2008.

ultimately establish a reference level. Ghana is aware of the drivers leading to forest degradation and deforestation (as presented in Component 2 of the R-PP), but is not yet able to quantify their impact on forest carbon stocks. A better link between the policy and technical REDD-plus processes is therefore needed.

It would also be useful to assess not only the drivers that decrease carbon stocks, but also the drivers that lead to an increase of forest carbon stocks, given that they may be encouraged in future through incentive policies as part of the national REDD-plus strategy.

A wall-to-wall stratification of forest carbon stocks for the entire country should be considered. Ghana's proposal under Step 3-3.2 is to estimate carbon stocks only for those areas undergoing major change. This makes sense as accuracy is needed for the core areas of REDD-plus implementation on the sub-national level. Nonetheless, this needs to be embedded in a systematic national forest monitoring system. The different objectives and activities on national and sub-national level and their linkage should be further explained.

**Recommendations:**

- Better linking the assessment of drivers, current MRV capacities and related capacity gaps to obtain key historical data
- Develop some principles on what type and detail of data would be anticipated to finalize the formulation of policies, specify priorities and provide the foundation for the development of a reference level
- Better specify what approaches would be anticipated in case of uncertain or missing data (i.e. emission factors for forest degradation)
- Provide better understanding on how the national strategy could be implemented through a systematic national MRV system and a sub-national measurement plan to capture the key carbon stock changes
- Consider to broaden the capacity building activities (under activity 3.1) to extension officers who act as trainer-of-trainers for local landowners and farmers and reflect on the possibility of revising the training curricula of the colleges of agriculture, wildlife and forestry, to include carbon stock assessment. Under Activity 3.6 consider to take better advantage of the existing national capacities that could for example be provided by the teaching and research staff of the Biometric as well as the GIS and Remote sensing units of the Faculty of Natural Resource of KNUST, the GIS Unit of the Forestry Commission and the Centre for Remote Sensing and Geographic Information Systems (CERSGIS) of UG.

➔ **The standards for component 3 have yet not been met**



**Component 4. Design a Monitoring System**

**Standard 4: Design a monitoring system:** The R-PP provides a proposal for the initial design of an integrated monitoring system of measurement, reporting and verification of changes in deforestation and/or forest degradation. The system design should include early ideas on including capability (either within an integrated system, or in coordinated activities) to monitor other benefits and impacts, for example rural livelihoods, conservation of biodiversity, key governance factors directly pertinent to REDD implementation in the country, and to assess the impacts of the REDD strategy in the forest sector.

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

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

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

The R-PP provides a good overview on monitoring system as a whole and on existing capacities and problems encountered when assessing implementation. It also refers to a number of key points that will be considered to establish a MRV system in Ghana.

The TAP understood that remote sensing approaches will be used to measure forest area changes. However, there needs to be more clarification on how to measure carbon stocks and changes. The ideas articulated in component 3 and components 4 do not seem congruent. It should be clarified what type of measurements are anticipated on the national level and what type of measurements will be applied at the sub-national level.

The TAP is of the opinion that the design of the MRV System could be considerable improved. The following observations should be taken into account:

- The MRV system description as it stands now is not a "design"; it is more of an assessment of capacities and problems with some intentions to improve the situation. The MRV system design, although initial, should be more detailed and specific on how it would meet national and international requirements. The suggested approaches are generally valid and useful but not specific enough to be applied under an R-PP approach in Ghana.
- The institutional arrangements are not clearly presented, including roles and responsibilities for MRV of actions and support. What is missing is the integration of participatory approaches (local chiefs, local communities and land holders) into the MRV system and Ghana's REDD-plus strategy. This should be integrated under Activity 4-3.
- This component pre-supposes an approved national sampling design or grid (ideally permanent sample plots, with areas (hot spots, where are they?) that may require higher levels of sampling intensity and frequency. While this could be influenced by future International Agreements, a tentative sampling design is recommended
- The linkage between MRV and on the REDD-plus policy strategy is not clear and need to be presented better.

In respect to the various REDD pilot activities ongoing in the country, it is not clear how the monitoring system is going to adequately follow them up and document on them. A central registry is important in order to gain knowledge, with regular updates from the various proponents of such projects. The R-PP might want to consider including such a registry in the MRV concept.

One TAP member reflected on the possibility to design a simpler monitoring system with cascading levels requiring in each step less technology, lower cost and lower capacity: the 1. level can be dependent entirely on satellite data sets and through national authorities; the 2<sup>nd</sup> level could involve different civil society and local governments to focus on systematic and targeted carbon measurements under a national umbrella; and a specific set of measurements could build upon on data collected by forest communities that are directly associated with REDD implementation actions.

**Recommendations:**

- Take into account the observations and recommendations made above
- Specify in more detail the steps for a national process to evolve an MRV system as part of a national strategy.
- Define the role for civil society, local government authorities, forest communities and land owners in the MRV system.
- Consider to use some of the suggestions made in the recent UNFCCC technical paper on this issue, e.g. <http://unfccc.int/resource/docs/2009/tp/01.pdf> and the report the assessment of national forest monitoring capabilities in tropical non-Annex I countries: Recommendations for capacity building under [http://unfccc.int/files/methods\\_science/redd/country\\_specific\\_information/application/pdf/red\\_d\\_nat\\_capacity\\_report\\_herold\\_july09\\_publ.pdf](http://unfccc.int/files/methods_science/redd/country_specific_information/application/pdf/red_d_nat_capacity_report_herold_july09_publ.pdf).

→ The standard for component 4 has yet not been met.

**Component 5. Schedule and Budget**

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

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

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

The work schedule is fine, though considering the timing for step 2 and 3, overly optimistic. Some of the step 1 activities, in particular capacity building, might need more time (e.g. The aspect on training for monitoring carbon stocks should be an on-going activity and not limited to only 2010).

The budget (which is presented at the end of each component) should be summarized in component 5. More details needs to be given in the budget of each component.

**Recommendations:**

- Revise the timeline of activities considering the overall ambitious goals to be met in a relative short time frame
- Detail more the budget under each component of the R-PP and give an overview budget table under Component 5 (now missing)

→ The standard for component 5 has been generally met.

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

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

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

This component gives a good overview on the overall framework of programme monitoring. The proposal to nest it within the multi-donor sector budget program framework (NREG) should be pursued, as proposed in the R-PP. What need to be more elaborated are the indicators that will be used to monitor program performance of the R-PP activities and the Readiness process.

**Recommendations:**

- Develop indicators to monitor programme performance of the R-PP activities implementation
- Develop indicators to monitor progress in the Readiness process a whole, considering the wider REDD-plus dimension.

→ The standard for component 6 has yet not been met.