

**Country:** Cambodia  
**Title:** Readiness Preparation Proposal (R-PP)  
**Version:** January 11, 2011  
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**Reviewer:** UN-REDD Programme

1. The executive summary presents the architecture of the REDD+ initiatives in Cambodia and the integration of the R-PP and the Cambodia UN-REDD National Programme into a National REDD+ Roadmap. On page 5, there is a statement that Cambodia was granted “observer status” [to UN-REDD] in October 2009. To be accurate, it was invited to join the UN-REDD Programme, and to be an observer to the UN-REDD Policy Board.
2. General Principles: This section is very important and clear. We suggest to include reference to the importance of learning lessons from the REDD+ initiatives in other countries and to consider regional collaboration to increase the cost effectiveness of the actions in the country. As for example, the regional collaboration, or bilateral collaboration with neighbouring countries would allow sharing emission factors, software etc. and increase the efficiency for reporting and decrease the cost of measurements. Also, while the statement that the process should be “consistent with the international negotiations process” can be interpreted to imply that the safeguards agreed at Cancun apply, a more direct statement to this effect would be useful.
3. National REDD+ Management Arrangements: In the “Background” section, on page 12, it is stated “*Most forests in Cambodia are state public property ... therefore most forest carbon is owned by the state*”. This is an important statement, and it is therefore important to ensure its accuracy. Next door, in Viet Nam, the Constitution states that all land is owned by the people, and that the state represents the people in this regard. This is an important distinction, so it would be appreciated if it could be double-checked whether, under the Constitution of Cambodia, the state owns the land, or the people own the land (represented by the state).
4. National REDD+ Management Arrangements: In the “National Responsibilities” section it would be good to have more information regarding the access to the data for the department of climate change to report under the UNFCCC and particularly the access to the activity data and the emission factor for the LULUCF sector. From those responsibilities it would be good have information on:
  - The Designated Agency for the GHG inventory including the identification of the National Coordinator/Director, the data Management Coordinator, the QA/QC Coordinator, the uncertainty Analysis Coordinator, the Agriculture & Land Use, Land Use-Change Sector Leader, the forestry Sector Leader etc.
  - Additional information on:
    - What is the national authority with a mandate for REDD+ issues?
    - Has an operational unit been established with a clear mandate for the preparation of the national greenhouse gas inventory?
    - Has an operational unit been established with a clear mandate for the preparation of the forest inventory?
    - Has an operational unit been established with a clear mandate for the collection of the agriculture data (e.g. animals and cropland)??
    - Are units established on a temporary basis or are they a permanent authority within the national administration?

- What is the functional relationship among those units in regard of exchange of data, information, expertise, etc.?
  - What is the level of decision-making autonomy of the units in their respective fields of competence?
  - What is the functional relationship of those units with the UNFCCC national focal point (exchange of data, information, expertise, etc.)?
  - What is the relation between the REDD+ authority and the units in charge of estimating GHG emissions/removals from forestry, agriculture and overall national GHG inventories?
5. National Readiness Management Arrangements: While Cambodia is a non-Annex I party under the UNFCCC, it does not have to develop and report for the development of a national system for GHG inventory. However, since Cancun, the reporting activities by Cambodia will have to increase particularly if external funding is provided. According to the decision, under the NAMAS the Parties will have to report at least every two years if funding is provided. Under the REDD+, the reporting will have to be in line with the decision for the NAMAs. Moreover it is important to support the development of a national system for GHG inventory that allows a permanent data management and collection on a permanent basis. In that attempt, it would be important to have information on the legal, procedural and institutional arrangements that are already developed or under development in Cambodia.
  6. Proposed National Coordination Arrangements: it would be interesting to see who will do the quality assurance, quality control, and verification procedures in the future.
  7. Section 1.b “Information sharing” etc.: The role of the private sector is only briefly mentioned. The potential for the private sector to provide relevant information should be described in various sections of the R-PP.
  8. Section 1c “Consultation and Participation”: The role of the website can be more developed particularly regarding the use of the website to share information and allow verification. Verification can be performed by various entities including non-governmental organizations.
  9. Section 1c “Consultation and Participation”, Table 1c: The consultation group and stakeholder group need capacity building in order to understand the issues in the same way we understand them. And vice versa. This would allow a common comprehension and decrease the risk of misunderstanding and conflicts.
  10. Section 2a “Assessment of Land Use ...”, Analysis of the drivers: It would be good to include a reference to the document prepared by Jeremy Broadhead.
  11. Land concessions: On pages 33-34 it is noted that “*Conversion forest areas are considered under the law as heavily degraded idle forestlands*”. It is not stated (or the reviewer did not locate the statement) as to how “*heavily degraded idle*” is defined. Sale of CF as land concessions is described on page 37 as a threat, yet it is difficult to envisage that CFs can be defined as “idle”. Therefore, the proposal on page 44 that “*Reviewing regulations for land concessions*” is one of the possible REDD+ strategies would seem to be most appropriate. Additional details on this issue would be useful.
  12. Adopting the nested approach, page 44: It should be noted that Phase 3 of REDD+, under which performance payments are made under the UNFCCC, requires national accounting and reporting.
  13. Section 2c “REDD+ implementation framework”: The framework should also consider:

- Institutional Relationships
  - assess and document the strengths and weaknesses
  - ensure continuity and integrity of the inventory
  - promote institutionalization of the inventory process
  - identify future improvements.
  
- Source by source background document for methods and data.
  - document and report the origin of methodologies, AD, EF
  - Identify future improvements
  - future reference for each source
  
- QA/QC Procedures
  - guide to establish a cost-effective QA/QC program (clarify roles, tasks)
  - improve transparency, consistency, comparability, completeness, and confidence
  
- Archive system
  - guide to establish a cost-effective Archiving system
  - collection of records and where records are kept
  - appropriate and systematic archiving of all compilation
  - national inventory must be transparent and reproducible
  - foundation for development of subsequent inventories
  
- National Inventory Improvement Plan
  - serves as an official national road map for the national inventory improvements

14. Finance for REDD+ Readiness implementation: Carbon market mechanisms: are they already available?

15. Existing forest carbon plot data (page 66 and Table 10): It should be confirmed that the raw data are available.

16. “Design of a Monitoring System” (Component 4): Should include the development of national software to assess the carbon stocks and carbon stock changes, and land use change and greenhouse gas inventory. This will allow the country to reach Tier 2. ALU software can be considered as an interim solution but it would be preferable to develop national specific database and software that allows access to data for QA/QC and elaboration of the national specific estimates.

17. The REDD+ monitoring system should not only focus on carbon. The REDD+ monitoring should be an integrated system for data management, reporting, verification, to provide the necessary information to allow the government to take the necessary actions at the right moment e.g. to stop deforestation or species invasion etc. The information provided by the national forest inventory also concerns biodiversity, and could include socio-economic aspects. Moreover, the REDD+ monitoring system provides not only a performance tool to manage the information on carbon stocks for GHG reporting but also on the multi-benefits of forest, the interaction of communities with forest and the application of safeguards.

18. National forest cover: as noted in the document, the forests fall into the administration of the forest administration but also fishery and agriculture. Moreover, it seems preferable that the assessment is performed by the three administrations in order to develop the relevant data for REDD+ but also for them to manage the territory that falls under their responsibility.

19. Generalized allometric models: at this point, Cambodia can develop his own allometric models. Based on destructive sampling, comparison with generalized allometric equations from the IPCC-GPG - development of a new model requires access to the raw data used for those equations.
20. Section 4b: "Multiple benefits, other impacts, and governance": Although there is no obligation to report on safeguards as negotiated in Cancun, a comprehensive information management system should be capable of storing and providing information on the social and environmental safeguards. This could be stated explicitly.
21. Section 4b: "Multiple benefits, other impacts, and governance": There should be a detailed description of the corruption challenges likely to face REDD+ in Cambodia. This will be an enormous challenge for Cambodia, and measures to address the risk of corruption should be a major subject of the monitoring system.
22. Component 6, Table 6 (page 88) is empty in the version under review.