

Comments from the World Bank Team on Tanzania's R-PP (version submitted in October 2010)

- We note the impressive work that has been carried out by the Government of Tanzania in developing the R-PP and to improve it as per earlier comments provided by TAP reviewers on previous draft versions of the R-PP.

Component 1a: National Readiness Management Mechanism

- The roles and responsibilities of the different bodies constituting the National Readiness Management Arrangements have been better clarified and elaborated. However, a few points for improvement remain:
- **Transition process for the REDD Task Force:** The REDD task force, appointed to oversee technical and operational issues of REDD readiness implementation, is described as an interim structure reporting to the NCCTC that will be replaced by a more permanent structure in 2010. Given the proposed timeline for transition, we recommend elaborating in more detail the proposed transition process and planned institutional arrangements for the new permanent structure. In particular more information on when and how the currently narrow sectoral and purely governmental composition of the task force would be broadened to include additional sectors and representatives from outside the government (NGO, civil society, private sector, etc.) as described in the R-PP would be informative.
- **Composition of the NCCTC:** The current composition of the NCCTC as described in the R-PP does not provide for representation from outside the government sector. In line with the composition of the NCCSC, we thus recommend to include representation of civil society and private sector representatives.
- **Regional and local level arrangements:** As per R-PP, REDD Coordination at the regional and district level is aligned with the Local Government Reform process in Tanzania. As such, the Regional Administrative Secretariat serves as the link between the Ministries and District Councils. To ensure consistent coordination with Regional Secretariats and Local Government Authorities we thus recommend to include a representative of the President's Office of Regional Administration and Local Government (PMORALG) in the REDD task force (and the permanent body expected to replace the task force). Coordination and feedback loops between the local and the national level are particularly important for Tanzania's REDD Readiness approach which places a lot of emphasis on pilot projects. Weak and ineffective linkages between central level, regional administration and local governments have also been identified as one of the factors contributing to weak governance in the forest sector institutional framework, thus further emphasizing the need for more effective coordination in the REDD management framework.
- **Consistency of organogramme and descriptive text:** The organogramme (Fig 1.1.) does not fully correspond to the presentation of the institutional structures as described in the text.

This mainly relates to the lower hierarchical levels, which do not demonstrate the broader sectoral representation that is presented in the text. For example, the R-PP describes that Regional Administrative Secretariats will coordinate REDD activities at the Regional level and Local Environmental Committees will serve to coordinate REDD activities at the District and Municipal levels, however the organogramme appears to suggest that sub-national level implementation is delegated to District Forest Officers.

- **Detailed TOR for the REDD Task Force and Secretariat:** Reference is made in the text to detailed TOR for the REDD Secretariat and the Task Force, but the respective Annex 1a2 is not yet included. Availability of these TOR would be helpful to better delineate the functional relationship of the two bodies and their respective role in the national process and vis-à-vis donor-financed REDD initiatives in the country.
- **Role of “National REDD SC”:** We suggested to clarify the role of the “National REDD Steering Committee” that has been established as per Table 1a (On-going REDD preparedness activities). If this body is synonymous to the NCCTC, we recommend to ensure consistent presentation of the REDD implementation arrangements throughout the document.

Component 1b: Stakeholder Consultations and Participation

- **Building on past experiences:** It is great that Tanzania is capitalizing on their experience with community based NRM and bringing lessons on participation, decentralization and inclusion into the REDD readiness process. In this context, it is commendable that conflict resolution mechanisms related to REDD+ will build on the existing conflict systems that exist at the local and national level.
- **Stakeholder mapping exercise recommended:** It appears that the target audience for the consultations conducted was biased more towards official government and institutions at national, local, and village levels as indicated in the participants list in the annex. We recommend conducting a stakeholder mapping/analysis exercise to help determine all the relevant stakeholders that are to be either positively or negatively impacted by REDD+. This will help to develop a targeted consultation and participation framework. We further recommend building on existing participatory mechanisms to enhance active stakeholder engagement that allows a two way communication process and allows stakeholder groups to remain engaged in the process.
- **Reporting on feedback received from consultations:** The R-PP should provide more information on the feedback and key messages received at regional workshops and how these messages have informed R-PP development or will inform REDD strategy options. To ensure that consultations are as effective and meaningful as possible, we note that information should be shared with relevant stakeholder groups prior to consultations.
- **Vulnerable and marginalized forest dependent communities:** Tanzania has acknowledged the importance of consulting with forest dependent communities and has drafted ToR to conduct an assessment of the forest dependent communities. It will be important to ensure that these groups will be consulted in a culturally appropriate manner using the right medium of communication. We further recommend that concerns of communities related to land tenure aspects, property rights and customary land rights will be discussed as part of the

consultation process. It will be important to identify and reconcile exiting and potential conflicts related to land rights as they may have major implications for REDD + implementation.

- **Definition of Indigenous Peoples:** Discussions related to the terminology and definition of Indigenous People in Tanzania and application of World Bank safeguard policies related to Indigenous Peoples in general will be conducted at the broader portfolio level between the Government of Tanzania and the World Bank.

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

- **Improved analysis of past experiences on Participatory Forest Management:** Overall, the description of major land use trends, direct and indirect deforestation and degradation drivers has much improved compared to earlier versions. We especially note that the analysis of experiences made under decentralized arrangements for forest management (Joint Forest Management, Community Based Forest Management) has been strengthened and lessons learned are now discussed with more rigor. In particular the challenges related to inclusive community involvement and to operationalization of benefit sharing mechanisms are important experiences that will need to be taken into account during the REDD readiness process. We recommend to also review these experiences in more detail as part of the SESA process in an effort to improve social equity aspects as part of REDD Strategy development.
- **Room for improvement in the cross sectoral analysis:** The analysis of sectors with potentially competing interests and conflicting policy objectives could be further improved. For example, the interaction between the Government's agricultural initiative, Kilimo Kwanza, and the proposed REDD Strategy could be elaborated with more substance. In particular, more evidence on the commitment and capacity of agricultural sector stakeholders to monitor carbon emissions could be discussed. Similarly, the interaction with other policies outside the forest sector that have impact on deforestation and forest degradation could be expanded, e.g. planned and ongoing infrastructure and mining initiatives.
- **Land tenure aspects:** We note that more emphasis has been placed on analyzing land tenure aspects in response to earlier comments as this is a crucial building block for developing a sound REDD Strategy. We recommend placing considerable emphasis on the review of available analytical work on the topic during further development of the National REDD Strategy; particularly on factors that have hindered effective implementation of a favorable legal framework for PFM.

Component 2b: REDD Strategy Options

- **Articulation between REDD Strategy options and sector strategies:** Table 2b-1 provides an excellent overview on how the proposed REDD strategy options are intended to respond to the drivers of deforestation. While the linkages between the drivers and respective strategy responses are well presented, we recommend placing more emphasis on the need for the integration of the different sector policies. In the Strategy Building Framework section, the National Forest Program (NFP) is clearly presented as the basis for the REDD Strategy.

However, linkages of REDD strategy options with other important sector strategies and programs, such as the Agricultural Development Strategy (ADS), Kilimo Kwanza as well as sector strategies relevant to infrastructure and mining sectors are not very well articulated. In this context we take note of the suggested national strategic in-depth studies that are proposed as part of the REDD Readiness process, in particular i) the study on the role of REDD for rural development (including cost benefit analysis of different land uses in the REDD context) and ii) the study on the Legal and Institutional Framework (including macro- and multi-sectoral policy review). Both studies will be critical to help clarifying competing and conflicting sector policy objectives during further REDD strategy development.

- **Importance of capacity building for district and local officials:** We agree with the considerable budget that has been earmarked for training and institutional capacity building for local government and district officials on governance and knowledge sharing as per Table 2b-b on Strategy Activities and Budget. Given the decentralized institutional arrangements in Tanzania, adequate capacity building and financial support to local government institutions will be critical to ensure effective implementation at all levels.

Component 2c: Arrangements for REDD Implementation

- **Role of non-government stakeholders in the development of the REDD framework:** Table 2c-1 provides a good and comprehensive list of issues and actions to be addressed in the further development of the REDD framework. However, the table remains vague on the identified lead institutions for each task and simply defines broad categories of actors (i.e. government, research institutions, etc.) rather than identifying concrete sectoral lead ministries and specific lead research institutions. While stakeholders outside the government sector are given a joint facilitation role on various issues including baseline development, stakeholder engagement, CSOs are prominently missing as facilitators on actions that are critical to them, such as the definition of equitable benefit sharing mechanisms, development of guidelines to ensure social safeguards, identification and valuation of co-benefits, as well as land tenure security. We recommend to clarify the role and expected contributions of nongovernmental stakeholders in the further development of the REDD framework, especially with view to the importance of a meaningfully inclusive and participatory process for REDD Strategy Development.

Component 2d: Environmental and Social Impacts

- **Presentation of the purpose of the SESA:** The P-PP describes that a Strategic Environmental and Social Assessment (SESA) will be carried out. An overview of the key elements of the SESA is also presented in the R-PP. This section could be strengthened with a better description of the purpose of the SESA, i.e. that the SESA process is intended to i) inform and help refine REDD Strategy options in an effort to prevent and minimize potential social and environmental risk attached to proposed REDD Strategy options and to ii) enhance positive benefits that can be achieved. We further recommended to elaborate that the SESA is a *process*, which implies that there may be no or only limited diagnostic work additional to what is already planned to be carried out for the REDD Readiness process. Instead the SESA process will need to be carefully choreographed with such planned diagnostic work to assess

potential environmental and social risks.

- **Purpose of the ESMF:** It could be better clarified that the purpose of the Environmental and Social Management Framework (ESMF) will be to a) inform the public on the risk and potential impacts that could affect stakeholders as a result of implementation of the REDD+ Strategy and b) provide a practical and operational descriptions of principles to be adopted and procedures to be followed by the lead agencies to comply with the World Bank's safeguard policies, based on a sound assessment of which safeguard policies are most likely to apply.

Component 5:

- **No financing gap:** The R-PP provides a detailed and sound budget to cover costs of all planned REDD readiness activities (US\$ 10.1m). Substantial donor funds have been leveraged from NORAD, FINLAND, UN-REDD, and the Clinton Climate Initiative (CCI). It is noted that no funds will be requested from the FCPF.