

Carbon Fund Participants’ Consolidated Comments on DRC’s Draft ER-PD & TAP Review - Compliance with Methodological Framework

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1. General Comments & Questions

- The recent concerns expressed by civil society (see FCPF website) about **the corruption risk** in the program are valid. It would be useful to clarify how third party monitoring could play a role and how the corruption risk in the program will be mitigated.
- We would appreciate additional information on the **status of the moratorium on new logging concessions**, any potential intensions to lift the moratorium, how this could impact the proposed ER-Program, and any plans to analyze the social, environmental, and economic costs and benefits of lifting vs. maintaining the moratorium, and any mitigation measures that would be put in place to reduce the costs.
- There is a lack of detail around the **consultation work**. Outreach and engagement with local communities would be seen as very positive, however all the proposal states is that they did consult.
- Further details of some of the **goals of the programme** would help better understand the context e.g. the INDC and poverty reduction targets and how will these be measured. How far does the programme go to achieving these issues?

2. Level of Ambition (new Province)

Overall, there are concerns **that necessary capacity in the newly created province is very limited** and that this aspect is not sufficiently addressed in the ERPD to ensure that the program can deliver and that associated risks are mitigated. We recommend DRC to expand on delivery capacity.

Individual Comments:

- The ERPD outlines a very ambitious ER Program which involves many stakeholders and local institutions and which requires the establishment of institutional arrangements. Given that the province of Maï Ndombe has just been created as of January 2016, **more information and precision is needed on the challenges** more broadly (e.g. with 2016 provincial and deputies election?) but also more concretely on the development of local institutions, in particular on organizational arrangements at the community level and how institutions will be strengthened and become operational.
- The ERPD states that the provincial government of Maï Ndombe will be the main agency responsible for the program implementation. In order to better understand the level of engagement and ownership of the province, further information is needed on the **functioning and operationalization of the government for the new province** and which provincial ministry / department will be the lead agency to carry out the ER-Program.
- We've followed the elaboration of the ERPD and it is resulting from extensive technical work and consultations with partners. The provincial government has been progressively implicated into the design of the program (with regular consultations happening at provincial level), yet capacities are extremely limited, in particular since the recent implementation of the

decentralization process. Capacities were not built along the ERP preparation process and are left to be dealt with by the future program management unit. In this context we need to **be realistic and careful about the amount of responsibilities allocated to local entities** (CARG, CART, local governments,...) as for most they need to be operationalized and capacity needs to be created from scratch.

- As capacities of both the Ministry of Environment as well as the provincial government are considered very weak (or in the latter case hardly functioning yet), a **risk assessment and rating on governance capacity** is needed. What are the risks related to the creation of the new province?

3. Carbon Accounting

Overall, **methodologies applied are very complex** making an assessment difficult. The TAP review tries to address the main issues but the impression is it could not fully review all technical aspects that are of high importance. Especially, non-compliance with IPCC guidance and intransparent application of different data sets raises questions.

The methodological stringency and the consistency of Reference Level with the national level, GHG-accounting and the MRV are issues raised by the TAP and reaffirmed by the CFPs. The **lack of comparability** with other ER programs is a strong concern by the CFPs.

FRL and MRV methodologies are not consistent and not fully in line with IPCC guidance which introduces a risk of increasing uncertainties and reduces transparency. This poses a great risk of overestimating emissions in the REL (especially from degradation but possibly also from deforestation) and potentially underestimating emissions in the program period because the MRV applies less complex and different (inconsistent) methodologies. As a result, there is a high risk that ERs would be strongly overestimated.

CFPs find the **justification and quantification for the adjustment** not convincing and entirely transparent. Additionally, there are several methodological issues regarding the calculation of the adjustment and the data used.

CFPs share the TAP's view that **risk analysis is not conclusive** and that there appears to be a significant underestimation of particularly the displacement risk. Consequently, described measures for risk mitigation are not deemed sufficient and the calculation of necessary buffer credits appears to be too low.

The CFPs are concerned about the calculation of the amount of buffer credits and the **lack of transparency in the application of the VCS and Methodological Framework** methodologies more broadly; increased transparency would help ascertain that the ERPD can satisfy the requirements of both methodological frameworks.

Individual Comments:

a) Scope

- **Carbon pools should be consistently included or excluded** over the whole program area – the EF for different strata can be different.
- **Excluded pools and gases:** The ER-PD excludes certain pools (litter, soil organic carbon, deadwood) and gases (CH₄, N₂O) without quantifying the total emissions from those pools. Reasons for exclusion are stated as insignificant emissions or conservativeness. The ER-PD should provide a more detailed rationale through literature or primary data for evidence as to why these pools/gases are excluded in order to fully comply with the methodological framework. The TAP assessment points out instances where the ER-PD provides insufficient rationale or even incorrect rationale for exclusions.

b) Transparency

- **The carbon accounting section is very complex** and whilst not designed for the 'causal reader' the TAPs comments on the comparability and transparency of the information should be taken very seriously.
- **More detail on transparency** could be helpful. For example, the ERPD may need elaboration on how the methodological steps and spatial information will be made publically available.
- **Key data sets** and methodological steps to enable the reconstruction of the Reference Level are **not publicly available**. The TAP assessment reveals that of the 36 carbon accounting indicators, 13 were not compliant. This is not necessarily an issue of non-compliance for these carbon accounting indicators, but an issue of transparency. The TAP was not able to confirm compliance with a number of indicators because little to no information was provided to clarify strategies or methodologies.

c) Consistency with IPCC Guidelines

- Agree with TAP observations that the methodologies of various components of Emissions Reduction Program **are inconsistent with IPCC standards** as well as each other, possibly due to the Government of DRC wanting to leverage off methodologies from existing subnational programs. What is of most concern is that the ER-PD is not built on IPCC methodologies and its data will not be consistent with the national GHG inventory.
- The observation of the TAP that the ERPD does not clearly follow IPCC guidance has to be evaluated in more detail (Ind. 5.1. - also taking into account the Methodological Guidance Document of GFOI, which provides more detailed methodological guidance especially for change detection and statistical analysis).
- The ERPD indicates that the latest IPCC guidance was used "as a basis for estimating" and also relies on guidance from VCS methodologies and CDM methodology. The **ER-PD does not explain which IPCC methodologies** were used or how the IPCC guidance was followed more broadly.
- The TAP assessment highlights examples of important differences between the ER-PD and IPCC methods. It is therefore important for the **ER-PD to explain in more detail how the IPCC**

guidance was followed or how it is compatible with the mixed methodology employed. A key point made by TAP is that use of other methods does not necessarily introduce error or uncertainty, but it creates a comparability issue with other emissions reductions programs, international REDD+ programs, or even national programs/GHG inventories that may employ IPCC methods. The **assessment of indicator 14.2** (page 26) - We would like clarification regarding this “yes” finding.

d) REL estimation

- The **soundness of the methodology for detecting and quantifying degradation** is not clear, despite the use of different forest classes, which is a rather coarse approach especially given the degradation dynamics as described under unplanned degradation – this is an issue that is discussed controversially and methodological challenges are high, it has to be ascertained that the MRV system and the REL use a consistent approach that delivers reasonably reliable estimates. There appears to be a tendency to overestimate degradation in the REL, mainly due to the high EF when moving from dense to secondary forest and the use of discrete classes. From a technical perspective it seems doubtful that the distinction between dense and secondary forest can be made with high precision using available remote sensing technology (merits more detailed review).
- The **REL methodology is complex and uses a mix of approaches.** Stratification is done on various levels mixing land cover, land use and drivers for defining the strata. The differentiation between planned and unplanned deforestation and degradation is making carbon accounting more complex (and likely leading to less consistent results). It results from VCS guidance but in our view should not be used for carbon accounting but for the design of intervention measured and benefit sharing. The stratification approaches pose problems since the criteria are not mutually exclusive, cannot be discreetly defined and are likely to change over time. (see observations under C3 –Ind.3.1.)
- In essence, the **estimates of deforestation and emission reference levels seem to be strongly over-estimated** when compared to previous estimates for Mai N’Dombe or to existing estimates for the full DRC. As it stands we do not see the rationale nor justification for such an increase and hard to review because of the lack of information and the complexity of VCS methodologies.
- Our major concern comes from the differences in reference emission estimates between the ER-PIN and ER-PD from 14 MtCO₂e/year in ER-PIN to 102 MtCO₂/year in ER-PD. This increase comes from differences in activity data estimates, which are mainly **due to the inclusion of forest degradation estimates and to higher estimates of deforestation derived from a new approach based on a sample of satellite imagery and visual interpretation.** We raise **important doubts on these new estimates** and therefore strongly recommend requesting an exhaustive description on the input data, methodologies and results of interpretation which are currently missing. The available information is insufficient to assess the data quality and the accuracy of the results.

The higher deforestation rates observed at the end of the reference period needs to be better justified. These deforestation **increase suddenly and significantly from 70,000 ha/yr in 2010 to 170,000 ha/yr in 2011.** This has major repercussions on the historical average deforestation levels and on the reference emissions. Such sudden jump in the deforestation rates is surprising and need a detailed explanation.

- RL setting and measurement, monitoring and reporting: The TAP concerns on data quality are significant – **further elaboration on the proposed processes** for data collection, quality control and quality assurance could be helpful

e) Adjustment

Justification:

- The ERPD justifies adjustment based on an **increasing population**, yet the **regression analysis** does not identify this as a key factor. Further relevant information and analysis on the justification of expected increasing deforestation due to population growth in the ERPA period would be welcome.
- The argument for **increasing timber harvesting rates** from logging concessions on page 126 is not convincing. The CFPs suggests the use of historical data on exploitation of annually legally available logging area, rather than assuming that management plans will be exploited to their full extent. The ERPD has already followed this approach for the average annual volume.

Quantification:

- CFPs agree with the TAP that the **linear regression model is very difficult to follow**. While interesting, this approach: 1) Does not comply with the good practice of static baselines (eg activity data should not be adjusted once the baseline is set), and 2) would create additional uncertainty on volumes.
- The CFPs agree with the TAP review comments on indicator 13.3 and invite DRC to provide **further information on the added value of using the linear regression** approach for quantification of the adjustment, over a simpler approach such as a flat and constant adjustment for all emission sources.

HFLD-eligibility:

- CFPs note that **different data sets are used for estimating deforestation rates in the program area and at the national level**. The newly uncovered high deforestation rate in the program area makes it challenging for DRC to demonstrate that it meets the eligibility criteria (Criterion 13, Indicator 13.2 i.), allowing for an HFLD adjustment.

f) Reference Level Period

- The CFPs note that the proposed reference period, specifically the **end-date 2014, is not compliant with the Methodological Framework**. Indicator 11.1 of the Methodological Framework stipulates that "the end-date for the Reference Period is the most recent date prior to 2013 for which forest cover data is available to enable IPCC Approach 3. An alternative end-date could be allowed only with convincing justification.
- The CFPs also note that the DRC could **conduct complementary work that would make the Reference Period compliant** with the MF Indicator 11.1, but that this would require additional costs (not specified) and reduce accuracy due to high cloud ratio (not specified).
- An option not reflected in the ERPD, is the **possibility of removing the historical emissions from changes occurring between 2013-2014 from the suggested ERPD REL**. Figure 10, page 128 of the ERPD gives the impression that annual historical deforestation estimates are available, and the average historical deforestation is the average over the reference period. If this is the case, then the simplest approach would be to remove the data point estimating annual deforestation

between 2013 and 2014 from the calculation of average historical deforestation. This means that the effort DRC has made in detecting and estimating the changes between 2004 and 2014 would not need to be redone. Only the estimated reference level would have to be recalculated as the average of the estimated changes between 2004 and 2013, resulting in a historical average period of about 10 years (8-9 yrs).

g) Consistency REL and MRV / Monitoring

- In regards to assessment of criteria 14 (pages 25-26 of TAP review): the **GFOI methods and guidance** documentation could assist DRC to provide clarity about forest monitoring approach that will be used. This may achieve consistency between proposed methods for reference level setting and programme monitoring.
- Indicators 14.1 and 14.2 Robust Forest Monitoring System: We note with concern the two proposed approaches for REL and forest monitoring during the emission reduction period. We strongly **encourage a comparison of the two methodologies** before the first verification period.
- Different approaches to REL (sampling) and monitoring (wall to wall): It is assumed that after doing both approaches in the first verification period, the program will demonstrate the similarity of results – but what if it doesn't? [Consider the TAP's advice on this]
- Consistency between REL methodology and MRV is of utmost importance, especially given the complex methodology used for the REL calculation (strongly second TAP review under 14.1.). Otherwise there is an **inherent danger of overestimating degradation** in the REL and underestimating it in the program period.
- Underlying methodology of RLs (sampling) is not consistent with methodology for national MRV (Wall-to-wall) – the **statistical soundness of the sample methodology applied is not exhaustively discussed** and it remains unclear if it is the most suitable approach for change detection (from the document it is not entirely clear how the change detection works, e.g. direct classification or post).
- Reference level and monitoring system: The difference of proposed approaches for reference level setting and program monitoring **could lead to a lack of consistency, accuracy, and meeting UNFCCC guidance.**
- **RIL is a key activity** for this program, but there is little information on how results from these activities will be measured and MRVd.
- The planned/unplanned stratification seems to obfuscate the basic purpose of FRL, that is to factor out "business as usual" emissions from accounting, so that only additional mitigation is rewarded. **How will planned/unplanned deforestation be segregated in monitoring? How will planned/unplanned degradation be segregated in monitoring?**

Uncertainty regarding MRV of emissions from planned degradation: the TAP suggests not relying only on forest concessions' self-declarations and use third party monitoring. It is precisely to mitigate this risk that the program is working on a **REDD+ compliance standard for forest concessions**, with the support of the EU REDD Facility. The role of independent monitoring organizations will also be crucial. It is important to note that these partners (OGF, Moabi),

although featured in the ERPD, do not have any funding secured to perform their tasks during the implementation of the program.

h) Consistency REL and national REL / GHG inventory

- While the ER-PD explains how it will inform the upcoming national reference level, information is needed on how it will **achieve consistency with the country's GHG inventory**.
- Further **guidance could be provided by the Global Forest Observation Initiative (GFOI) Methods and Guidance** documentation which outlines the steps in achieving consistency between the Reference level and the national GHG inventory. Version 1 of the MGD has been translated into French, so can be directly referenced by DRC Government officers/technicians.

i) Uncertainties

- We are taking note that **Monte Carlo method** is not used in REL setting but should be used when calculating emission reductions.
- In regards to Indicator 8.1 (page 17,18) the **concerns around systematic errors** are founded. Would it be possible to provide some advice on an appropriate approach to use?
- The numbers reported under the accuracy assessment do not make clear if it concerns overall accuracies or **the precision of the estimates for change detection** (the most relevant number). The **confidence intervals for the EF are quite large** (as has to be expected) but under the error discussion reported numbers are very low. The GFOI Methodological Guidance Document (MGD) provides in-depth guidance for the estimation of uncertainties for change detection. It is recommended that the accuracy assessment is reviewed in front of this background.

j) Buffer, Accounting for Displacement (Leakage) & Reversal (Non-Permanence)

- The TAP concludes that insufficient information is provided about **risk management strategies to prevent/minimize risk of displacement, reversals, and leakage**. The TAP recommends revisiting the risk strategies to address governance risk, program design and strategy, carbon rights and revenues, and funding risks. If the risk assessments are not reviewed there is a potential for an overestimation of long-term emissions reductions. The risk strategies are not necessarily inadequate, however they are not transparently explained.
- While the risks to the drivers of deforestation and degradation and their associated risk of displacement are assessed, these risks are **yet to be addressed through an effective strategy** (C17). Similarly, the ERPD does not sufficiently address measures to minimize the risk of reversals, nor conducts an appropriate risk assessment (C 18).
- **The risk assessment may warrant additional attention** (especially political and governance risk; program design and strategy; carbon rights and use of carbon revenues; and funding risk). These have a proposed risk rating of 0 in the ERPD, which may be underestimates that could lead to overestimating long-term emission reductions. Furthermore, as mentioned at the beginning of the TAP report, the jurisdictional entity being a newly created Province (1 January 2016), warrants particular attention to the particular opportunities and challenges that are relevant to implementing a program in this case.

- Based on the description of the program, and the scale of the interventions on charcoal, it seems highly likely that reduced volumes of charcoal production in the program area would be compensated by increased production elsewhere in the Kinshasa supply-shed. We would appreciate much more detail on why it is not believed **there would be a risk of domestic displacement**. We note that the design of the buffer will need to follow the Buffer Guidelines adopted by the Carbon Fund. As presented, there appear to be inconsistencies.
- **Further information required whether the VCS buffer is equivalent to the MF** and in line with the Buffer Guidelines. Note also the TAPs comment on dealing with uncertainty and the appropriate conservativeness factor (should be 15% not 8%).
- JNR Buffer mechanism – the ERPD states that the DRC is planning on using a JNR buffer mechanism, however **no timeline for VCS JNR validation** is set out in the ERPD. We recommend that a timeline for VCS JNR validation is set out in the ERPD prior to ERPA signing.

k) Other Points

- **Specific comment by BP: The MF- VCS Hybrid approach** – we are supportive of the integrated methodological approach that the DRC is proposing, and consider the MF and VCS JNR to be complimentary in an environment where markets for REDD+ emission reductions are uncertain. This is particularly important for private sector participation which will ultimately make REDD+ a sustainable emissions reduction mechanism. We would like to be clear however that “It is planned that only emission reductions in excess of the ERPA signed with the Carbon Fund will be issued as Verified Carbon Units (VCUs, i.e. carbon credits issued by the VCS)” (p. 89 of the ERPD) would be limiting for participants in fund such as BP. More broadly, having access to VCUs from the ER program(s) may attract private investment, open up financing options for countries, and create new pathways for sustaining the programs over the longer term. Public finance for REDD+ programs has been vital to facilitate the development of national REDD+ infrastructure and initial ER offtake, but could be supplemented and ultimately succeeded by market-significant private finance, beginning with proactive public-private partnerships.

4. Safeguards

While the Safeguard System is still being developed, more **clarity is needed on the monitoring** of safeguards and the **contextualization of the national standard** on provincial level. Furthermore, the risk assessment (especially regarding governance and capacities of newly created Province) should be more profound and the **identified risks should be addressed** by effective (safeguard) strategies.

Overall, the process and way forward is not entirely clear and how it is embedded in national processes linking with the international level.

Individual Comments:

- In regards to the assessment of indicator 24.2 (page 36): having a **local NGO/civil society group participate** in the provision of a province-specific social/environmental overview could contribute to demonstrating acknowledgement of World Bank risk and consultation safeguards.
- **Safeguard plans (Ind. 24.2) still need to be developed** which address social and environmental issues and include related risk mitigation measures more specifically addressed to the circumstances in the jurisdiction of Maï Ndombe. In line with the TAP's recommendation, the safeguard monitoring arrangements should also include and complete information on Indigenous Peoples (Ind 25.1). While the principles for the FGRM have already been identified, **the FGRM needs to be finalized** and operationalized as soon as possible in order to ensure grievances in relation to the ER Program are dealt with appropriately.
- The work on safeguards has suffered some delays and there is indeed the need to now **contextualize safeguards indicators and verifiers to Mai Ndombe** area, and make the safeguards grid implementable in the current context (low monitoring capacities). The EU REDD Facility is currently supporting this reality-check and definition of a workable grid for the program.
- It would be helpful to explain briefly how DRC's national social and environmental safeguards **relate to the ESMF and to the Cancun safeguards**.

5. Sustainable Program Design and Implementation

Financing Plan & Benefit Sharing: It is not clear whether proposed measures can be financed without additional **up-front funding**. The CFPs recommend being more specific and making transparent what the anticipated sources of funding are. Similarly, there is more detail needed on envisioned benefit sharing plans (especially, what use the funds are put towards).

Individual Comments:

- Overall, there appears to be some **disconnect between driver analysis, program measures and the results from FRL construction**. It appears that while impact from logging is a main contributor (legal and illegal) to the causal chain resulting in degradation and deforestation, there is limited action directed to this activity. It seems questionable that addressing subsistence farming and firewood collection in itself are sufficient to significantly decrease emissions. It would be helpful to have a stronger link between driver analysis, estimation of emissions (FRL construction) and program design.

a) Benefit Sharing

- In line with Indicator 30.1 of the MF, the DRC is to make the Benefit Sharing Plan publicly available prior to the ERPA signature, at least in an advanced draft. In order for the Benefit Sharing Plan to **reflect broad community support, consultation with critical stakeholders, especially communities need to be conducted in advance through appropriate and adequate means of communication**. The ER Program needs to pay special attention to ensure the Benefit Sharing Plan receives support by IPs and local communities (Indicator 31.1). More details on the consideration of gender and inter-generational issues would be helpful.

- In order to ensure transparency, consultation and participation of the design of the benefit sharing arrangement (criterion 31), all **relevant figures and information should be disclosed in the Benefit Sharing Plan**, as an official Annex to the ERPA. More information is needed on the previous agreement signed with the DRC Government which grants one single company 15% of the entire budget, e.g. who will be the recipient of the money? What will go back into the communities, etc.? (see pages 76, 181 of the ERPD)

b) Non Carbon Benefits

- Further information would be appreciated to assess whether the non-carbon benefits are culturally appropriate as well as gender and inter-generationally inclusive (Indicator 34.1). Furthermore, information on **the monitoring of the non-carbon benefits**, e.g. baseline, targets or proxies identified, would be desirable.

c) Financial plan

- Better **clarity on how the various financial instruments complement each other** and how they are utilized for the realization of the objectives of the programme, paving way for the generation of ERs would be helpful. If the advanced payment does not materialize, what is the assessed consequence?
- More **information on the financing plan** needed, including how program design will take into account efficient coordination of different financing sources (including a narrative on how FIP, CAFI and other financing (including the certainty of other VCU buyers) fit together. How are the program structure and key activities on page 50 different or additional to what is being done through the FIP and CAFI?
- Explanation on the **need and use of the proposed \$6.5m advanced payment (10%)** – how integral is this to the implementation of the programmes, what are the gaps? What happens to DRC’s plans if these funding streams do not happen? Are there backup plans?
- A reflection on the current willingness-to-pay of \$5/t would be helpful.
- **Financial management:** Several options are presented, such as the National REDD Fund, as well as government management. The National REDD Fund will be managed by the UNDP Multi-Partner Trust Fund Office. The selection of Fund management/mechanism should be clarified before ERPD-submission.
- A sustainable long term mechanism for protecting forest - we recognise that carbon finance may be used to promote and develop alternative sustainable livelihoods, but **consider that market significant private sector finance must be mobilised** following the expiration of the fund to ensure that emission reductions are sustainable in the long term. This is in response to Page 178 of the DRC’s ERPD – ‘it is in fact expected that non-carbon benefits will take over from the carbon revenues as incentives to reduce deforestation and degradation. In a program designed to promote the development of economic activities, the **carbon benefits are an investment lever that loosen cash constraint.**

6. ER Program Transaction (ER title, land tenure and registry)

Individual Comments:

- From our understanding, the legal basis for the transfer of ER titles to the Carbon Fund will be the REDD Regulation 2012 and its requirement to enter into a “partnership contract” with the government. However, **there is still some uncertainty in case of conflicting (land) rights / ownership rights of the state and those of communities or private landholders**. These potential conflicts should be addressed and solved by the time of the ERPA signature.
- There still seems to be uncertainties regarding criterion 37 - **to avoid multiple claims** to an ER title. The DRC will have its own National Registry and any generated ERs, once measured and verified, will be issued as “domestic ER credits” (ERCs). However, the wording in the ERPD draft seems not clear as it states that ERCs will be allocated to the ER-Program entity and also to holders of projects who signs carbon-related contracts with the government. Further clarification is therefore needed to ensure multiple claims are avoided.
- Outstanding land tenure challenges are yet to be addressed, including how the REDD+ Regulation contracts will be enforced and how claims can be **legally pursued**. Another issue which is to be clarified is the **legal nature of ERs resulting from community forestry** (customary law) activities which could be conflicting with the (land) rights of the state under the Convention.
- Data Management/Double Counting: The details of the DRC national REDD+ registry, once it is developed will be important for **ensuring avoidance of double counting, transparency on safeguards information, etc.**