

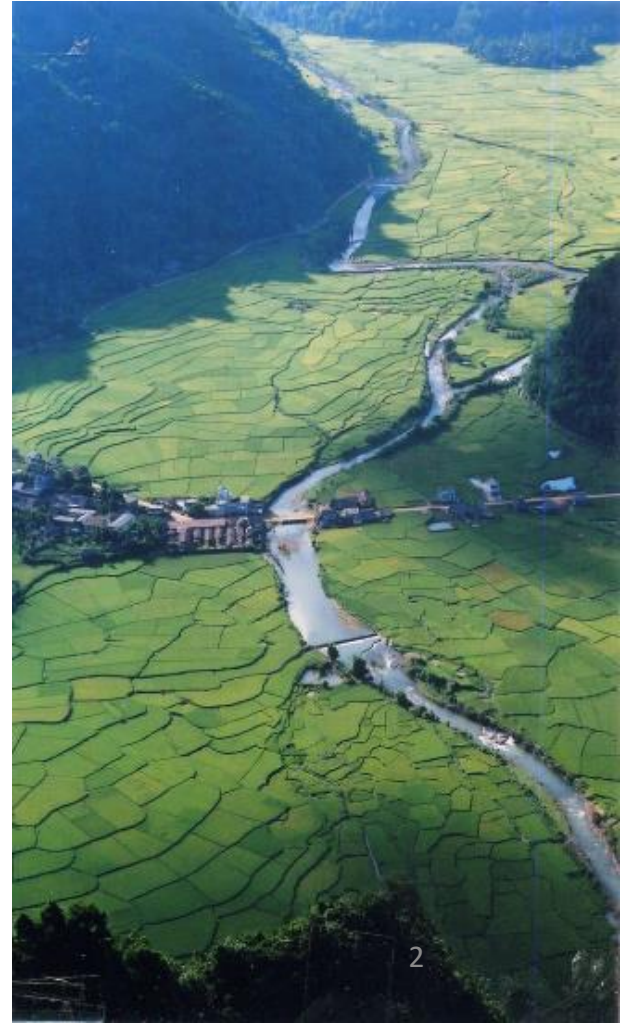


# **RESPONSE TO TAP AND CFP ON VIETNAM ER-PD**

**CF15 Meeting, Washington DC USA  
December 12-15, 2016**

# Introduction

- **Provide comments/clarification to issues raised by TAP Assessment Report.**
- **Comments/Clarifications focus on:**
  - **Summary of responses to TAP review**
  - **Summary of responses to TAP issues**
  - **Summary of responses to the issues raised by CFPs (environment, drivers, reference level, financing, ownership)**



# Summary of response to TAP

***TAP's Review recognized the significant changes that have been made to the ER-PD in response to TAP's initial review.*** A few other areas need further clarification, including:

- TAP comment is that the ER-PD **does not includes activities for conservation of forest carbon stocks or sustainable management of forests,** but in fact it does.
- TAP review saying **no program to support poverty alleviation,** but ER-PD includes poverty reduction programs.

- TAP Review should **recognize the proposed safeguards** that are/ will be in place;
- TAP Review seems to **underemphasize the ER-PD recognition of people's rights** and in particular ethnic minorities, **in fact the ER-PD provides extensive dialogue on people's rights**;
- TAP should **take account of the statement** (in the ER-PD) that people including ethnic minorities **will receive support for the granting of land use right certificates**.
- All **data and reports are available on two websites**. Data on the VRO website is consolidated and complete. <http://www.vietnam-redd.org/Web/Default.aspx?tab=project&zoneid=110&itemid=630&lang=en-US>

# Responses to TAP comments

Indicator and TAP Comment	Vietnam Response
<p><b>Indicator 5.1</b> The ER Program identifies <b>the IPCC methods used to estimate emissions and removals for Reference Level</b> setting and Measurement, Monitoring and reporting (MMR).</p>	<ul style="list-style-type: none"> <li>▪ Agreed, it is more consistent with IPCC approach if removals are estimated over time, and accuracy is to be confirmed.</li> <li>▪ Using single removal factor for forest type may not result in over-estimating removals;</li> <li>▪ Modelling approach can be used for removal estimation over time, but makes it more complicated.</li> </ul>
<p><b>Indicator 6.2</b> ... <b>make key data sets or analyses publicly available</b> to help understand how the data were used in the calculations.</p>	<ul style="list-style-type: none"> <li>▪ All data related to ER-PD are made available on website of VRO Vietnam (maps, reports and spread sheets are)</li> <li>▪ <a href="http://www.vietnam-redd.org/Web/Default.aspx?tab=project&amp;zoneid=110&amp;itemid=630&amp;lang=en-US">http://www.vietnam-redd.org/Web/Default.aspx?tab=project&amp;zoneid=110&amp;itemid=630&amp;lang=en-US</a></li> </ul>

Indicator and TAP Comment	Vietnam Response
<p><b>Indicator 10.3</b> The ER Program explains <b>what steps are intended in order for the Reference Level to achieve consistency</b> with the country's existing or emerging <b>greenhouse gas inventory</b></p>	<ul style="list-style-type: none"> <li>▪ There is a certain level of consistency between RL and national GHG-I (forest definition, carbon pools, gases)</li> <li>▪ There remains inconsistencies (AD, emission factors, reporting time)</li> <li>▪ UN-REDD is supporting to close the gaps</li> </ul>

Indicator and TAP Comment	Vietnam Response
<p><b>C 23 To prevent double-counting ERs</b></p>	
<p><b>Indicator 23.</b> In sum, it would be useful for the ER-PD to <b>provide a status of REDD+ related projects in the country and how double counting will be avoided</b> both from project to subnational level programs</p>	<ul style="list-style-type: none"> <li>▪ Section 18.2 of ER-PD proposes to develop a system of carbon titles <b>attached to land titles, and the land title Registry;</b></li> <li>▪ It provides government guaranteed title and a system for checking and ensuring carbon titles of land owner and that avoids double counting;</li> <li>▪ MARD, in collaboration with MONRE and others, is responsible for coordinating and monitoring REDD+ related projects</li> </ul>

Indicator and TAP Comment	Vietnam Response
<p><b>Indicator 28.3</b> The ER Program provides a <b>description of the implications of the land and resource regime assessment</b> for the ER Program Entity’s ability to transfer Title to ERs to the Carbon Fund</p>	<ul style="list-style-type: none"> <li>▪ Legal documents (PM Decision 1775; 2053) provide legal framework on carbon trading;</li> <li>▪ A legal PM Decision on carbon title on forest will be completed by June 2017;</li> <li>▪ As part of this the State, as in all other resources in Vietnam, land, forests, minerals will assume ownership of carbon and manage the carbon;</li> <li>▪ This will facilitate a State guaranteed carbon title and this will also allow for the title to be transferred free of encumbrances.</li> </ul>
<p><b>Indicator 36.2</b> The ER Program Entity <b>demonstrates its ability to transfer to the Carbon Fund Title to ERs,</b></p>	
<p><b>Indicator 36.3</b> The ER Program Entity <b>demonstrates its ability to transfer Title to ERs prior to ERPA signature,</b> or at the latest, at the time of transfer of ERs to the Carbon Fund.</p>	

# CFP comments - Environment

CFP Comment	Vietnam Response
<p><b><i>Safeguards, Conversion of Natural Forests:</i></b> Steps should be taken to <b>ensure that natural forests are not substituted by plantation forests</b> or converted to other uses.</p>	<ul style="list-style-type: none"> <li>▪ This risk believed to be moderate and will be limited to a small area.</li> <li>▪ Integrate GOV regulations on conversion of natural forest into codes-of-practice;</li> <li>▪ The ER Program to ensure that plantation establishment follows SFM practices &amp; improved productivity</li> <li>▪ Support for monitoring of existing forest areas, awareness and capacity building</li> <li>▪ The ER Program to build on the Environmental Protection Guidelines for Plantation Management (part of the EIA for the FSDP).</li> <li>▪ Safeguard monitoring of environmental impact mitigation</li> </ul>

# CFP Issues – Reference Level

CFP Comment	Vietnam Response
<p><i>Reference Level:</i> The proposed <b>update of the Reference Period to 2005-2015 is welcome</b>. A justification as required by the Carbon Fund Methodological Framework (a strict interpretation of criteria 11.1 would require the end date to be 2014) needs to be provided.</p>	<ul style="list-style-type: none"><li>▪ Landscape in Vietnam is dynamic, a more up-to-date Reference Period would be a better for program planning</li><li>▪ Vietnam national forest inventory (started 1990) is implemented in a 5 year cycle and the latest is for 2010</li><li>▪ Considering availability of forest data and the consistency with national forest inventory the end date for RL is December 2015.</li><li>▪ It also gives flexibility to use the existing forest cover map for 2005 to define the start of the Reference Period.</li><li>▪ Updating RL for 2005 – 2015 is in progress and be completed in June 2017.</li></ul>

# CFP Issues – Drivers

CFP Comment	Vietnam Response
<p><b><i>Drivers of deforestation and forest degradation:</i></b>  <b>Interventions beyond the forest sector are necessary to effectively address the key drivers in the Program Area, including cross-sector mechanisms and policy-level actions.</b></p>	<ul style="list-style-type: none"> <li>▪ The main causes of deforestation and forest degradation - conversion to other land uses and poor policy implementation</li> <li>▪ Interventions addressing persistent D&amp;FD prioritize improved forest governance, monitoring, capacity building etc.</li> <li>▪ <b>Central level:</b> i) Law on master planning; ii) Cross-cutting policies related to planning and coordination; iii) Governance &amp; monitoring (incl. hydro power development); iv) Implementation of VPA/FLEGT</li> <li>▪ <b>At the site-level:</b> i) Empower forest owners; ii) Law enforcement; iii) Poverty alleviation; iv) Forestland allocation, forest enhancement, SFM; v) NRAP implementation; vi) Forest monitoring</li> </ul>

# CFP Issues - Financing

CFP Comment	Vietnam Response
<p><i>Program Financing:</i> It is crucial to <b>demonstrate the financial viability of the program</b>, including the use of domestic resources and synergies with other sources of finance.</p>	<ul style="list-style-type: none"><li>▪ <b>The total ER-P cost (2018-2025) is 437.9 M\$.</b> Sources of funds are estimated at 548.3 M\$, <b>including 110 M\$ from RBP.</b></li><li>▪ <b>A current financing gap is 15.9 M\$.</b> This includes a small 10% advance of ER payments of the total benefits over 2 years.</li><li>▪ <b>The advance is necessary for institutional confidence building and trust, provincial and local acceptance.</b></li><li>▪ The VN GoV commits to a very <b>large and long term investment of the 437.9 M\$ for the program.</b></li><li>▪ It is expected that as the process moves towards the final ERPA that further funding sources will firm up with the imminent prospect of a completed signed ERPA.</li></ul>

# CFP Issues - Ownership

CFP Comment	Vietnam Response
<p><i>Ownership:</i> Beyond the expectation that the Final ER-PD responds to the technical assessment by the TAP, a key decision criteria for CFPs is <b>government ownership and political commitment to ensure the effectiveness and sustainability of the program</b>, including - and in particular - through effective cross-sector coordination.</p>	<ul style="list-style-type: none"><li>▪ Strong political &amp; financial commitment of VN GoV to CC mitigation &amp; adaptation, incl. ER-P. It is a government ownership program.</li><li>▪ MARD, on behalf of the GoV, will lead and manage the program</li><li>▪ A Provincial REDD+ Steering Committee (PRSC) be set up at province to coordinate ER –P and integrate with line sectors.</li><li>▪ The PRSC is multi-sectoral committee with representatives drawn from most provincial departments.</li></ul>

# THANK YOU

