



global witness

Review of R-PPs submitted to the 7th FCPF Participants Committee Meeting

Provisions on Enforcement and Non-carbon Monitoring November 2010

This assessment examines the Readiness-Preparation Proposals (R-PPs) due to be considered at the FCPF's 7th Participants Committee meeting in Washington DC (1 – 3 November 2010).¹

This assessment focuses on: 1) how the documents address illegality, corruption and law enforcement issues; 2) engagement of relevant stakeholders in the implementation of the R-PP; 3) whether a system for independent monitoring is considered and if civil society and other relevant stakeholders are involved; 4) what type of system is proposed to monitor and assess governance and social and environmental impacts (non-carbon monitoring); and 5) whether the proposed Monitoring and Evaluation system will assess the level of transparency, accountability, consultation and stakeholder participation in the readiness process.

Our evaluation is largely based on the standards established by the FCPF for assessing R-PPs.² The complete results can be found in the Annexes to this document:

Annex 1 – Evaluates those R-PPs subject to formal assessment at the 7th Participants Committee meeting:

- (i) Tanzania; and
- (ii) Lao PDR

Annex 2 – Evaluates the R-PPs that will be informally presented at the 7th Participants Committee meeting:

- (i) Ethiopia;
- (ii) Madagascar;
- (iii) Peru; and
- (iv) Viet Nam

¹ Ethiopia (draft), People's Democratic Republic of Lao, Madagascar (revised), Peru (draft), Tanzania (revised), Viet Nam (draft); available on the FCPF website at: <http://www.forestcarbonpartnership.org/fcp/node/257>

² FCPF Program Document FMT 2009-1-Rev.4, "Review and Assessment of Readiness Preparation Proposals, Draft – March 9, 2010"

Summary

The six REDD country proposals under consideration by the FCPF Participants Committee generally recognise the key roles that weak governance, corruption and poor law enforcement play in driving or facilitating deforestation and forest degradation. For the most part, however, the proposals do not include adequate analysis of the underlying factors behind the drivers, nor do many of the proposals adequately identify the actors involved. The countries have made some reference to how to address these issues, although concrete actions are still poorly elaborated.

While most countries have recognised the importance of a system for monitoring governance and social and environmental impacts, little detail is generally given in their proposals about what these systems will look like, compared to the proposed systems for monitoring carbon emissions. Fundamental questions, such as what exactly will need to be monitored, who oversees the system, who participates in it, and how it will be integrated into a comprehensive monitoring system and into the broader REDD+ strategy, are for the most part not answered adequately, although some countries have taken initial steps.

Overall, our findings demonstrate the need for more guidance on non-carbon monitoring from the FCPF, as well as the international community more broadly, as early as possible during the “REDD+ readiness” process to enable the development of credible systems which can provide feedback to improve the design of REDD strategies.

Background: The critical role of non-carbon monitoring

A comprehensive monitoring system is an essential part of the FCPF’s “learning by doing” approach to REDD+ readiness. Without regular feedback on the implementation and impacts of readiness activities, it will not be possible to refine the design of programmes or clearly and meaningfully link activities to impacts, whether positive or negative.

Further, many of the readiness activities required to lay the groundwork for successful national REDD+ programmes will be carried out before any measurable emissions reductions will occur. Many activities cannot, therefore, be directly (or even indirectly) correlated with emissions reductions, although they are fundamental to ensuring that real and lasting emissions reductions are possible. In other words, carbon MRV is not sufficient for monitoring or assessing the outputs of interim REDD financing in a way that can usefully feedback into the design and assessment of REDD strategies. In the longer term, the compliance of REDD activities with governance, social and environmental safeguards, as established under the United Nations Framework Convention on Climate Change (UNFCCC) as part of an international REDD agreement or by multi-lateral development banks, will require the collection of more than just data on carbon. This has been recognised through the inclusion of a provision on monitoring and reporting on safeguards in the most recently published draft REDD negotiating

text.³ The text requires that the following safeguards *inter alia* are “promoted and supported” by developing countries:

- “Actions complement or are consistent with the objectives of national forest programmes and relevant international conventions and agreements”, i.e. policy coherence.
- “Transparent and effective national governance structures, taking into account national legislation and sovereignty.”
- “Full and effective participation of relevant stakeholders, including, in particular, indigenous peoples and local communities [in the design and implementation of key elements of a national REDD strategy].”
- “Actions that are consistent with the conservation of natural forests and biological diversity” and “enhance other social and environmental benefits.”

In addition to demonstrating compliance with these safeguards, monitoring provides the opportunity to build trust between stakeholders by increasing transparency, inclusiveness and participation in the design, implementation and review of readiness activities. Independent monitoring plays an important role in this by engaging relevant stakeholders, including representatives from civil society, indigenous peoples and local communities, and providing external verification at national level of implementation and impacts of REDD+ strategies.

While the emphasis of this study is the monitoring of governance and other safeguards or non-carbon “benefits and impacts”, the inclusion and engagement of key stakeholders, particularly local communities, in a system for carbon MRV will also be important. This has been repeatedly emphasised by members of the Technical Advisory Panels in their assessment of R-PPs, and has been included by the FCPF as part of the standards for assessing R-PPs (see below).

In the most recent R-PP template⁴, the FCPF has recognised the importance of countries identifying and addressing major governance issues in Components 2a and 2b, including:

- Identifying the “effectiveness of law enforcement systems”;
- Assessing “institutional capacity to enforce forest laws and governance issues; and
- Identifying linkages between the strategic options and key governance issues.

In the Guidelines to Component 2c, the R-PP template asks countries to:

- Describe how “the performance of the implementation framework” will be “monitored and reported” either as part of the MRV system or by a separate system.
- Describe how the “checks and balances” in the implementation framework should “ensure transparency, accountability and equity.”

³ Draft UNFCCC REDD text, FCCC/CP/2010/2, 11 Feb 2010, <http://unfccc.int/resource/docs/2010/cop16/eng/02.pdf> para 5 (c). The provision on monitoring and reporting on safeguards remains in square brackets, meaning consensus is still to be reached.

⁴ FCPF Readiness Preparation Proposal (R-PP) Template, R-PP v. 4 (January 28, 2010)

- Consider how stakeholders will be engaged in the implementation framework and how they will be engaged in the “robust mechanisms for independent monitoring, assessment and review.”
- Answer the question: “what other institutional and governance reforms might be needed (e.g., anti-corruption laws and measures, national best practices for fiscal transparency, clarifying roles and responsibilities within a decentralized forest management system, etc.)?”

The FCPF has also recognised the importance of monitoring beyond carbon and taken steps towards realising this with Component 4b in the most recent R-PP template dedicated to the design of a system for monitoring “other benefits and impacts” (i.e. non-carbon). Among the issues to be addressed according to guidance in the template are:

- Monitoring of “key governance factors pertinent to REDD implementation”
- Monitoring of “social and environmental impacts”
- Establishing “independent monitoring and review” that involves civil society and other stakeholders in a system that feeds back findings to improve REDD implementation
- An assessment of systems required for monitoring and review, transparency, accessibility and sharing of data both nationally and internationally (for both carbon MRV and monitoring of other benefits and impacts – Components 4a and 4b)
- Capacity building, and the scope and role of local communities, NGOs, government agencies and the private sector to participate in the monitoring system (for both carbon MRV and monitoring of “other benefits and impacts” – Components 4a and 4b)

In its standards for assessing the R-PP,⁵ the World Bank also requests that the following elements be included in the R-PPs:

- Early ideas on including capability to monitor other benefits and impacts, e.g. rural livelihoods, conservation of biodiversity, key governance factors directly pertinent to REDD implementation, and the impacts of the REDD strategy in the forest sector.
- A description of “how transparency of the monitoring system and data will be addressed”
- Addressing “independent monitoring and review, involving civil society and other stakeholders, and how findings would be fed back to improve REDD implementation.”

⁵ FCPF Review and Assessment of Readiness Preparation Proposals, Program Document FMT 2009-1-Rev.4

Summary of findings

Lao PDR

- The R-PP acknowledges that while there are adequate forestry laws in place, these are not being enforced. It also recognizes corruption, and involvement of government officials in illegal logging operations as main drivers of deforestation and forest degradation. The R-PP recognizes the need to build capacity at national and local level to strengthen law enforcement.
- There is insufficient information on the extent of civil society engagement in the implementation of the R-PP.
- The Lao PDR presents the most well-thought out system for non-carbon monitoring presented to date. The R-PP provides a detailed analysis of the benefits of monitoring beyond MRV of emissions and removals, and the potential role of local communities in this monitoring system. Lao PDR proposes to apply the Chatham House / UN-REDD framework for governance monitoring together with the CCBA standards, which is welcome.
- Lao PDR has not, however, decided upon which system to adopt for monitoring, reporting and verification of safeguards, and is currently considering government-led assessment in consultation with stakeholders, followed by public comments and third party verification of the annual reports an accredited institution.
- Lao PDR also proposes to establish a system of independent forest monitoring with strong terms of reference and enabling forest dependent people's representatives and the private sector to report forest crime and feed the information back to the REDD+ Task Force to improve REDD+ implementation.
- Provision is also made in the R-PP for developing biological and socio-economic monitoring subject to support for capacity building.

Tanzania

- With respect to the issues this assessment focuses on, the proposal by Tanzania is a notable improvement from its earlier draft produced for the 6th Participants Committee Meeting.
- Problems with poor governance are recognized, including corruption and illegal logging. It also recognizes this as preventing proper implementation of REDD.
- There is recognition of the need for capacity building to improve law enforcement but there are insufficient details of what those capacity needs are.
- The R-PP recognizes that stakeholders have not been adequately engaged in the implementation of the institutional and policy framework, and this still needs to be addressed.
- The R-PP addresses the need to monitor social and environmental safeguards, and governance factors, and for civil society to be involved. There are not, however, enough details on how this will happen in practice.

Ethiopia

- The R-PP acknowledges widespread and increasing illegal logging, coupled by a lack of a designated law enforcement institution to tackle this problem. It does not address corruption.
- The R-PP is unclear on the role of civil society in the implementation of the R-PP, although it does recognize the value of stakeholder engagement in monitoring and inspections. There is acknowledgement of the need to strengthen capacity of community-based organizations.
- The R-PP recognizes the need for a monitoring system that goes beyond MRV of emissions and removals, but there is a lack of detail on how such a monitoring system would function.

Madagascar

- The R-PP highlights the need to involve all stakeholders in developing and implementing REDD+ but does not provide details on how this would happen in practice or how it intends to assess its feasibility.
- The R-PP also recognises the need to strengthen forest governance, with further capacity building. The measures proposed, however, lack detail and consequently no assessment is made of institutional capacity needs to implement measures to improve governance.
- There is also recognition of the need to monitor governance, and the impacts of the environmental and social safeguards although further details are needed on how this would be implemented in practice, particularly with regard to the involvement of civil society.
- The paper proposes a series of studies and the development of strategies for its 3 year readiness preparation phase. While supporting the intent of these studies and strategies, the R-PP does not provide any guidance or directions for how it intends to implement this.

Peru

- Compared to the first draft of the R-PP presented to the 6th Participants Committee Meeting in June 2010, this revised draft is a notable improvement.
- The R-PP has substantially improved, both in coherence and structure. Large sections have been rewritten with updated information.
- The R-PP recognizes the need for further studies to collect data on the drivers of deforestation and forest degradation, but at this stage does not acknowledge the role illegal logging and corruption might play.
- The R-PP has improved in its recognition of the need to engage stakeholders. However, while also recognizing the need to obtain consent from forest dependent peoples, the R-PP does not include this in its next steps and planned activities.
- The R-PP recognizes the need to monitor governance and social and environmental benefits, but does not address how these activities will be carried out.

Viet Nam

- The R-PP recognizes illegal logging as one of the main causes of deforestation, sustained by weak law enforcement. The R-PP provides an analysis of how to improve deficiencies in law enforcement, including community-based law enforcement. The R-PP acknowledges that more technical assistance and capacity building is also necessary.
- The government has also launched a campaign to raise public awareness and increase civil society engagement in REDD+, and recognizes the need for civil society to engage in monitoring.
- With respect to monitoring beyond carbon emissions and removals, the R-PP admits that more information is needed in order to undertake an assessment of its monitoring needs and costs.
- Although the R-PP acknowledges the need to monitor the AWG-LCA safeguards, it places an emphasis on the rights of Indigenous Peoples and local communities, conservation of biodiversity, ecosystem services and other social and environmental benefits, risk of reversals and risk of displacement of emissions. It does not expressly mention the need to monitor governance.

Annex 1
Assessment of R-PPs from Lao PDR and Tanzania

Lao PDR R-PP (October 2010)

1) Illegality, corruption and law enforcement

- a. Does the proposal describe the role of weak law enforcement, illegality and corruption in driving deforestation and forest degradation? Does it identify the primary actors involved and where capacity needs to be increased? (component 2a)**

Component 2a recognizes that problems with law enforcement and illegality exist in the forest sector, and have increased in recent years.

The R-PP sets out the relevant existing provisions of the Forest Law and shows how they are of themselves adequate to address illegality and corruption, however the R-PP acknowledges problems with implementation and enforcement of those laws. The provisions of the Forest Law are explained and appear adequate; in particular, Art 29 covers illegal logging (although does not define what is considered illegal logging), Art 100 prohibits forest staff and inspectors from being involved in activities that would put them in a conflict of interests with their public function, while Arts 101, 102 and 103 require permits to business for carrying out forestry activities and explicitly prohibits bribery (p.29).

Weak law enforcement and control are also mentioned as one of the main drivers of deforestation and degradation, alongside corruption and involvement of government officials in illegal logging operations (p.32).

The R-PP identifies a number of actors engaged in illegal logging activities, including domestic and foreign business men from neighbouring countries, local people and sometimes government officials (p.32). It also indicates rural households are engaged in illegal wood extraction for domestic consumption (p.31), and villagers who are engaged in small scale log extraction (p.45). The large scale illegal logging is done by harvesting contractors and (mainly foreign) operators (p.45).

The R-PP attributes weak control and monitoring of concessions by local authorities to inadequate capacities and available financial resources, insufficient availability of technologies (e.g. for monitoring) and information, as well as other factors such as lack of tenure clarity and awareness of land use rights (p. 33).

- b. What measures are proposed to address these issues? Is there an assessment of the institutional capacity to carry out these measures? (component 2b)**

The R-PP acknowledges problems with implementation and enforcement of the existing laws and seeks to address this by (i) improving dissemination of the laws to field staff and relevant stakeholders, and (ii) improving application and enforcement by building capacity of

Provincial, District and Village officials (p. 30). There is also a need to increase awareness amongst government bodies for the respective sectors (forestry, agriculture, hydropower and mining) of their respective responsibilities for tackling deforestation (p.37).

Lao is also looking to work towards certified sources of controlled wood by certifying Production Forest Areas using FSC controlled Wood Standard (p.30), which would also be beneficial to the FLEGT program currently under negotiations with the EU (p. 30-31).

The R-PP also recognizes the need for some regulatory reform. In particular, Component 2c provides that Lao will identify necessary Regulations to control speculators and brokers who may also be engaged in REDD funding opportunities (p. 54).

Lao also intends to begin enforcing provisions of the Forest Law that require all logging and harvesting equipment to be registered. It will begin enforcing this at a District level (with any unregistered machinery being impounded) and monitoring the effect (p.45).

Capacity building is identified as necessary at the local level. In particular, Lao proposes a consultation process with local communities to resolve issues of illegal logging and to determine the costs involved with addressing this (p.42).

Capacity building is also identified as necessary at the national level, and in particular the department of forestry (DOF) and the Department of Forest Inspection (DOFI) need to improve their monitoring and enforcement capacities through more and better trained staff (p.44), with DOFI currently focused on staff recruitment and training (p.47). The R-PP also recognizes the need to improve its technology to strengthen its capacity for surveillance and intelligence gathering (p. 47).

The R-PP also suggests the need to gather more reliable information on the scale of illegal logging so as to allocate sufficient resources to deal with it (p.46). In particular it proposes recording and publishing all exports of wood products (p. 46).

Despite the recognition that persons from neighbouring countries are involved in illegal logging, the R-PP does not address the possibility of exploring collaborative partnerships with law enforcement agencies from those neighbouring countries.

2) Institutional and policy framework

a. How are relevant stakeholders engaged in implementation framework? (components 1a and 2c)

The coordination of REDD+ activities is to be performed by the REDD+ Task Force (p.12). The composition of the REDD+ Task Force is not clearly spelled out. There are currently 12 members, 7 of which are members of relevant government agencies at different levels (p.12). It is unclear the extent to which stakeholders, particularly civil society, will be able to engage with the REDD+ Task Force in the implementation of REDD+. The R-PP, however, does say that

some of the meetings of the task force will be open to private sector and NGO representatives but it fails to explain the criteria of inclusion/exclusion of stakeholders (p. 13). The R-PP, however, provides that it may be necessary to restrict participation by stakeholder groups to a single representative, responsible for soliciting the views of other members of the group and reporting back (p.13). Implementation at the Division level is to be performed by the REDD+ Office, including monitoring REDD+ related activities, and stakeholder coordination and consultation (p. 13). The R-PP recognizes the difficulties in stakeholder consultation and participation as a result of 70% of the population being largely rural based and living more than 1 hours travel from their nearest District town (p.18). Consequently a Stakeholder Participation and Consultation plan (SPCP) is to be developed to provide a framework for stakeholders to learn about and provide inputs to guide the R-PP implementation (p. 19).

There is also concern that the list of stakeholders in Annex I, who were consulted in the preparation of the R-PP, predominantly includes representatives from Ministries, intergovernmental agencies, big international NGOs, carbon trading and logging companies, lacking adequate representation of national grassroots organisations (pp. 92-93). The lack of consultation of forest-dependent people is of concern. It is necessary that stakeholder participation under the SPCP address this issue.

b. Is there a system for independent monitoring, assessment and review of REDD implementation? Is the oversight system transparent, and how are civil society and other relevant stakeholders involved? (component 2c)

The R-PP does make reference to local community and village participation in the monitoring of carbon stocks within the village boundary, and the monitoring of a community forest management and emission avoidance plan (pages 41-42). While this may involve monitoring of management activities and governance issues such as illegal logging, the proposal is limited to monitoring of carbon stocks and emissions and does not provide sufficient details on the monitoring of REDD+ implementation or monitoring of the other benefits and impacts.

The R-PP provides that Lao is considering different options for monitoring, reporting and verification of safeguards, including the social and environmental safeguards and monitoring of governance. The options under consideration range from self assessment by government with no reporting and verification to independent monitoring involving public reports with verified comments and independent third party verification. The suggested procedure is for the REDD+ office to carry out a self-assessment “in close consultation with other stakeholders”, with the possibility of public comments to be made on the assessment before being reported internationally. Third party verification of the annual reports is also foreseen (p.84).

The R-PP also states that it will implement independent forest monitoring (IFM) to monitor logging, legal compliance and forest law enforcement. The information obtained from the IFM work will be fed back to the REDD+ Office and REDD+ task force and used to improve REDD+ implementation. The IFM model proposed (pages 84-85) adopts a strong set of fundamental

principles, however the R-PP does not provide any time frame for when this IFM work is to begin, or when it is to be completed.

3) Monitoring system

a. How will governance be monitored and assessed? (components 2c and 4b)

Component 4b sets out a detailed proposal to monitor governance (p.82ff). It recognizes the need to draw on existing initiatives, best practice, knowledge and case studies in developing a system and proposes to adapt the Chatham House / UN-REDD framework for governance monitoring to national circumstances, streamlining it with governance provisions in the CCBA standards, and develop country-specific indicators. The framework will monitor policy implementation, law enforcement, compliance with environmental laws, illegal logging, land use and carbon rights, equity of benefit-sharing arrangements corruption, institutional performance, and conflict resolution mechanisms (p.83). The REDD+ Office will conduct a baseline survey of governance factors involving NGOs, local communities, and the private sector, followed by annual monitoring based on stakeholder consultation which will inform corrective action. It recognizes that monitoring requirements will change as progress is made through the REDD+ phases.

As stated above, Lao is also intending to implement independent forest monitoring (IFM) to monitor logging, legal compliance and forest law enforcement, which will feed information back to the REDD+ Office and REDD+ task force to improve REDD+ implementation. The IFM model proposed (pages 84-85) adopts a strong set of fundamental principles, however the R-PP does not provide any time frame for when this IFM work is to begin, or when it is to be completed.

b. How will the environmental and social impacts of proposed actions be monitored and assessed? (component 4b)

It is proposed to use the CCBA/CARE principles and criteria as a basis for developing indicators. A baseline will be prepared followed by annual monitoring. As stated above, Lao is considering different options for monitoring, reporting and verification of the social and environmental safeguards ranging from self assessment by government with no reporting and verification to independent monitoring involving public reports with verified comments and independent third party verification.

The preferred procedure as suggested in the R-PP is for the REDD+ office to carry out a self-assessment “in close consultation with other stakeholders”, with the possibility of public comments to be made on the assessment before being reported internationally. Third party verification of the annual reports is also foreseen (p.84).

c. What methods for data collection will be involved? Is the system independent, how will civil society be involved, and what measures will be taken to ensure that civil society has the capacity to participate meaningfully? (component 4b)

Data collection will be based on wide consultation with stakeholders groups, and it is proposed that the framework for governance monitoring will be approved by a cross-sectoral multi-stakeholder steering committee such as the REDD+ Task Force to ensure wide ownership. However, as noted above the nature of participation in the Task Force is unclear. As stated above, the R-PP provides that Lao is considering different options for monitoring, reporting and verification of the social and environmental safeguards. Those options include various levels of independent monitoring and civil society involvement. One option being considered is independent monitoring involving public reports with verified comments and independent third party verification. The preferred procedure suggested in the R-PP is for the REDD+ office to carry out a self-assessment “in close consultation with other stakeholders”, with the possibility of public comments to be made to the assessment before being reported to internationally. Third party verification of the annual reports is also foreseen (p.84).

Further information on the involvement of civil society is not set out as the proposed system is still under consideration.

d. How is monitoring and assessment linked with the SESA process? (component 2d)

The R-PP provides that monitoring will be closely linked to the Social and Environmental Impact Assessment (SEIA) (p.84-85) but fails to explain in detail how this will occur. This is probably a result of the fact that various options for the monitoring system for the social and environmental safeguards are still under consideration.

e. How is it linked to MRV of emissions? (component 4a)

The R-PP makes reference to the MRV of emissions levels in Component 4a. It recognizes that satellite imagery will not be able to detect forest degradation and there is a need for more intensive monitoring (p.75). There is no discussion of whether this would involve ground truthing involving local communities, and whether that monitoring would also be linked to field inspections for the monitoring of the social, environmental and governance safeguards.

The R-PP does, however, recognize the link between the MRV of emissions and the detection of illegal logging (p.75).

f. How will the results be fed back into the design and implementation of REDD?

The monitoring system is still under consideration. Once the framework is laid out, it is anticipated that national reports assessing governance and the other elements mentioned

above will be produced annually and evaluated by an independent party (p.84). It is unclear, at this stage, how the results will be fed back into the design and implementation of REDD+.

With respect to logging, legal compliance and forest law enforcement, however, Lao is intending to implement independent forest monitoring (IFM), which will feed information back to the REDD+ Office and REDD+ Task Force to improve REDD+ implementation.

4) Will the proposed Monitoring and Evaluation system assess the level of transparency, accountability, consultation, and stakeholder participation in the readiness process?

There is no Component 6 addressing the design of a Monitoring and Evaluation system. It is unclear, therefore, how Lao will incorporate feedback from stakeholders, or monitor and apply lessons learned.

Tanzania R-PP (October 2010)

1) Illegality, corruption and law enforcement

a. Does the proposal adequately describe the role of weak law enforcement, illegality and corruption in driving deforestation and forest degradation? Does it identify the primary actors involved and where capacity needs to be increased? (component 2a)

Problems with poor governance from local to national level are acknowledged in the R-PP, including in particular that poor governance is a serious bottleneck to the implementation of REDD (p. 8). The analysis of governance on pages 21-22 identifies the following problems, corruption, elite capture, low accountability, lack of transparency, low levels of participation (presumably of civil society) and weak law enforcement. An analysis of strengths and weaknesses concerning establishing and implementing REDD in Tanzania includes among the weaknesses 'unsatisfactory enforcement' and 'entrenched corrupt practices and lack of good governance in the forest sector and elsewhere' (p. 15).

Tanzania's draft R-PP, dated June 2010 paid inadequate attention to illegality in the timber sector. In the revised R-PP, however, Tanzania recognizes in the assessment in Component 2a that timber extraction as one of the major causes of forest loss, and that far more timber than the official licence allows appears to be taken out illegally from the forest (p. 23).

Illegal timber extraction is also mentioned as one of the drivers/underlying causes of deforestation and forest degradation in Table 2b-1 (pages 30-32). Table 2b-1 proposes a number of strategic options to address illegal logging, which have been updated since the draft R-PP, and includes the development and implementation of forest management plans, along with participatory land use planning through Village Lands Forest Reserves (VLFR) (p. 31,

Annex p. 29), provision of alternative income generating activities and encouraging forest certification. The R-PP also mentions the necessity to increase the capacity of the Ministry of Natural Resources and Tourism to tackle illegal timber trade (p. 9) but does not provide any details of its capacity needs. The Annex also adds that field patrolling to curb illegal activity is essential alongside convictions for illegal use. The Annex acknowledges, however, the need for support and raising awareness of illegal activities (p. 43 of the Annex).

The R-PP acknowledges that corruption is a serious problem especially at local as well as national level (p. 22) and recognises the need to enact anti-corruption laws and measures, as well as national best practices for fiscal transparency, before a comprehensive REDD+ strategy can be finalized in Tanzania (p. 37).

The R-PP recognizes the direct causes of uncontrolled deforestation and land degradation as driven by market and policy failures, rapid (and uncontrolled) population growth and rural poverty, and the state of economy (p.22). This analysis, however, is based on desk studies with recognition that further analysis is needed to identify and understand the drivers and underlying causes and impacts in various agro-ecological zones so as to develop eco-regional specific strategies and programmes that can be utilized to address them (p.22).

While the earlier draft of the R-PP (June 2010) failed to adequately identify the actors involved in the forest sector responsible for driving deforestation or forest degradation, the updated version, now provides (p.23) that uncontrolled deforestation and degradation are caused by various actors including, local communities, small and large scale timber and charcoal traders, large scale farmers and refugees.

b. What measures are proposed to address these issues? Is there an assessment of the institutional capacity to carry out these measures? (component 2b)

A number of strategic options are identified in Component 2b to address illegal timber extraction (p. 31) and policy and governance failures (p. 32). The options identified are a considerable improvement from those in the draft R-PP from June 2010, including recognition of the need to ensure adequate financial, technical and managerial capacity to improve law enforcement. Training and institutional capacity for improved governance are included in the budget (p. 68) but no details are given of how this money is to be spent.

Component 2b indicates that strategic in-depth studies are planned under five themes (p.33), with governance issues to be addressed in the context of rural development (p. 33). The study will include an analysis of how weak governance and institutional capacity compromises the delivery of REDD benefits locally and globally.

There is also reference to the development of training of trainer programmes to be included in the study planned on REDD information needs. This, however, is limited to forest carbon monitoring and assessment and makes no mention of monitoring non-carbon issues, i.e. governance and social and environmental impacts (p. 34).

Some interesting pilot projects have been initiated that will be of relevance to governance issues: approaches to organising REDD work at a local level, with a focus on governance and tenure; incentive schemes that provide equitable benefit sharing mechanisms, especially to local communities; participatory methods for monitoring, assessing, reporting and verifying; and approaches that address drivers of deforestation and forest degradation (p. 35).

Under Component 2c (REDD Implementation Framework), several key issues are also identified relating to governance, including 'effective monitoring and evaluation of processes at national and sub-national levels', 'stakeholders engagement and involvement of local communities', and 'anti-corruption laws and measures, national best practices for fiscal transparency' (p. 37). The actions proposed in Table 2c-1 appear on initial analysis to address these issues (p. 37 ff – although note there is some inconsistency in page numbering here).

2) Institutional and policy framework

a. How are relevant stakeholders engaged in the implementation framework? (components 1a and 2c)

The R-PP acknowledges that stakeholders have been inadequately engaged in the implementation of the institutional and policy framework, and that issues still to be addressed include assessing levels of stakeholder engagement and participation (Table 2c-1, page 39-40).

A REDD task Force has been appointed by the Government to oversee implementation of technical and operational issues in relation to REDD readiness. The Task Force, however, is an interim arrangement and is to be replaced by permanent structures such as the National Climate Change Technical Committee (p.7).

Engagement of stakeholders in the REDD Task Force is crucial in the initial stages for effective implementation of REDD. The updated R-PP recognizes that despite the temporal nature of the Task Force, its membership needs to be expanded to include NGOs and forest peoples' organizations (p. 7). All key stakeholders are also expected to be included in the permanent structure following the Task Force (p. 7).

Weak governance is partly attributed to weaknesses in the existing forestry sector institutions (Annex 2.3, p. 30). The Annex recognises that administration has been weak especially in linking the local governments, regional administration and central levels.

In the Annex, Tanzania recognises the need to improve governance at local level, through capacity development of the village government in areas such as planning, mobilization, finance management, good governance, and lobbying. The local/central government also needs to provide the different skills through various training programmes done at village level.

b. Is there a system for independent monitoring, assessment and review of REDD implementation? Is the oversight system transparent, and how are civil society and other relevant stakeholders involved? (component 2c)

Involvement of local communities and other civil society actors is discussed in relation to carbon monitoring (p. 38), in part as a cost effective approach to gathering data (p.53). There is no provision for independent monitoring, or detail on how civil society will be involved in monitoring the implementation of REDD.

3) Monitoring system

a. How will governance be monitored and assessed? (components 2c and 4b)

b. How will the environmental and social impacts of proposed actions be monitored and assessed? (component 4b)

Component 4b of the FCPF template requires a country to show how its monitoring system will address monitoring of benefits and impacts beyond monitoring of carbon emission levels. Tanzania fails to adequately address this component of its monitoring system. The section on monitoring instead links components 4a (monitoring of carbon emissions) and 4b together. It then focuses mostly on monitoring carbon emissions and removals. Although this section of the R-PP does state that the MRV system will also monitor socio-economic factors related to rural livelihoods, conservation of biodiversity, key governance factors related to REDD implementation and assess the impacts of REDD strategy in the forest sector (p. 58), little information is provided on how this will be carried out. Moreover, there is no separate budget line for this activity.

c. What methods for data collection will be involved? Is the system independent, how will civil society be involved, and what measures will be taken to ensure that civil society has the capacity to participate meaningfully? (component 4b)

The R-PP states that Tanzania's MRV system is to be implemented at national, sub-national and local levels involving Government and state actors, civil society, NGOs, the private sector, local governments (including villages, women groups, the youth and teens) and consumer groups (p. 58). No details are given as to how this will happen, although the R-PP acknowledges that socio-economic monitoring tools, methodology and monitoring frequency are still to be developed (p.58).

d. How is monitoring and assessment linked with the SESA process? (component 2d)

In Component 2d, the R-PP states that the SESA will give special consideration to governance (among other things) (p.44). The R-PP also indicates that Tanzania proposes to undertake a SESA study that will come up with an Environmental and Social Management Plan that should include a 'simple monitoring system to monitor impacts' (p. 44-45). Annex 2d sets out detailed

terms of reference for the SESA, that includes recognition of the need to ensure adequate stakeholder participation and consultation (p.101). No further details are provided, however, on how this information will feed back into the SESA process or how other information obtained through monitoring and assessment will link to the SESA process.

e. How is it linked to MRV of emissions? (component 4a)

Tanzania does not propose the development of a separate MRV system for monitoring environmental and social impacts and for monitoring emissions. Instead only one system is proposed with a focus almost exclusively on carbon MRV – which is not surprising given the number of organizations which have been engaged to develop carbon MRV in Tanzania.

The R-PP does provide, however, that the MRV system will also monitor socio economic factors related to rural livelihoods, biodiversity, governance factors related to REDD implementation and assess the overall impact of the REDD strategy (p. 58). No details are provided as to how monitoring of carbon and environmental and social impacts will be integrated. This need to coordinate initiatives was recognized at a workshop on MRV (which focused on carbon) in February 2010.

f. How will the results be fed back into the design and implementation of REDD?

In August 2009, Tanzania developed a National REDD Framework that defines the policy, legal, institutional, financial and collaborative arrangements required to successfully implement a REDD strategy in Tanzania. Based on this framework, a number of demonstration projects and studies have been initiated to gather lessons and facts that will feed into National REDD Strategy design and implementation (p. 4).

The results of the Program Monitoring and Evaluation (p.72) also provides a means of feedback of information into the design and implementation of REDD. However, little information is provided on how this will occur, or how the level of feedback is to be evaluated.

4) Will the proposed Monitoring and Evaluation system assess the level of transparency, accountability, consultation, and stakeholder participation in the readiness process? (component 6)

The proposed Program Monitoring and Evaluation (M&E) contains benchmarks and qualitative and quantitative indicators to assess the progress of the REDD readiness program. Such indicators include the level of transparency in the R-PP development, inclusiveness of stakeholders, dissemination of information, and means of feedback (p. 72). However, Component 6 lacks detail on such benchmarks or how they can be fulfilled. The R-PP indicates that some of this work may already be being done, and therefore it is necessary in order to avoid duplication and promote coordination and transparency to establish a unified monitoring framework at national and subnational levels (p.72).

Annex 2
Assessment of R-PPs from Ethiopia, Madagascar, Peru and Viet Nam

Ethiopia R-PP (October 2010)

1) Illegality, corruption and law enforcement

- a. Does the proposal describe the role of weak law enforcement, illegality and corruption in driving deforestation and forest degradation? Does it identify the primary actors involved and where capacity needs to be increased? (component 2a)

The proposal does not address corruption in detail with it mentioned only once in the 220-page long document (p. 87). The report merely proposes the need for an agency or group, separate from the Auditor General Office to check the accounts of REDD+ money flows. The Auditor General Office and its regional equivalent are to be strengthened so as to have an oversight role regarding the cash flow of REDD+. The outcome of this is hoped to create checks and balances to ensure transparency, accountability and respect for anti-corruption laws and measures. The report does not elaborate on what these checks or balances will be or what anti-corruption laws and measures are in place.

Component 2a acknowledges that both legal and illegal forest use is widespread and increasing, because many regulatory policies regarding forest use have not been implemented, either because of the lack of resources (i.e. financial, human and institutional capacity) or as a result of the inherent deficiency of the forest regulatory instrument (p. 50).

The document also says that irregularities and inconsistencies in the implementation of bans on forest products (the irregularities are not elaborated on), have created a disincentive for forest-dependent people to invest in forest management and/or protection because of a lack of security over future returns (p. 50).

Component 2a also acknowledges a lack of law enforcement in Ethiopia. It says the absence of a dedicated institution coupled with an inadequate regulatory infrastructure are the primary causes for the lack of implementation and enforcement of the relevant provisions under Ethiopia's forest management policy and proclamation.

b. What measures are proposed to address these issues? Is there an assessment of the institutional capacity to carry out these measures? (component 2b)

As stated above, Component 2a highlights the absence of any dedicated law enforcement institution which would suggest a lack of institutional capacity to carry out law enforcement. It also states that many regulatory policies regarding forests have been un-implementable because of a lack of institutional capacity (p. 51).

Component 2a suggests that the designation of inspectors or monitors and the enactment of regulations, standards, directives and guidelines to concretely define and elaborate the

existing relevant public documents are necessary to enhance the implementation of, and compliance with, the relevant policies and laws issued in the forestry sector (p. 51).

Table 15 in Component 2c notes that a strong service-oriented forest institution is lacking and should be established by 2011 at Federal and Regional levels, with inputs from stakeholders. The institution should consider the different functions of REDD+, biodiversity and wildlife and define responsibilities for forest research and management (p. 83)

Transparency of the financial flows is to be promoted through book keeping records that could be placed in a public location. This would help community members especially to monitor money flows and expenditures of REDD+ financial support (table 6, p. 33).

Table 15 also highlights the need to ensure checks and balances to promote transparent accountability in the context of a future financial management system and of a benefit sharing framework for REDD+. However, there is no detail in the proposal on how these checks and balances will be created.

Table 15 provides for the set up of a separate agency/group to check the accounts of REDD+ money flows. The Auditor General Office will audit the financial flow annually, with its role and that of its regional equivalent to be strengthened to have a proper oversight on the cash flow of REDD+ (p. 87).

The financial mechanism is also to promote, inter alia, respect for anticorruption laws and measures, and national best practices for fiscal transparency (p. 87-88)

It is worth noting that these elements are only explained in the table but are not addressed in the main text or in the Annexes. A more thorough discussion of these ideas is needed to meet the requirement of the R-PP template.

2) Institutional and policy framework

a. How are relevant stakeholders engaged in implementation framework? (components 1a and 2c)

Component 2c states that extensive stakeholder analysis was undertaken during the R-PP development process on the issue of addressing deforestation and degradation (p. 76) The proposal states that the consultation process which was undertaken in preparing the R-PP (to help build broader ownership of the R-PP) will continue throughout the R-PP's implementation. Component 1b provides a good assessment of current stakeholder participation, which stakeholders are likely to be affected by the REDD+ process and to what degree, and also provides the most common recommendations from stakeholders in terms of focus areas for REDD+ strategy development (p. 23).

The Environmental Protection Authority (EPA) of Ethiopia chairs the REDD readiness process. Its role is to facilitate, coordinate and spearhead the process by bringing together relevant

stakeholders to engage in decision-making and action. However, it is not clear what is meant by “stakeholders” in this particular section of the text, and the only example mentioned in the R-PP of a stakeholder consulted by the EPA is representatives of the Ministry of Agriculture and Rural Development (MoARD).

In terms of national management arrangements, at the Federal level there is currently a REDD Steering Committee (RSC) which provides recommendations to the Environmental Council. The Environmental Council is chaired by the Prime Minister of Ethiopia and comprises of members drawn from federal Ministries, Presidents of National Regional States, representative of non-governmental bodies, the private sector and trade unions. (p. 12). A list of the member organisations of the RSC is provided at p. 15 and includes only one non-governmental representative. No list of the member organisations in the Environmental Council is provided.

The proposal also states that Topic Specific Focus Groups (TSFG) is under development and will be made up of specific experts. TSFG members will provide expert advice to guide the steering committees and working groups. There will also be an emphasis on strengthening community-based organizations that currently represent forest-dependent communities. This will include linking these organizations with REDD+ decision making bodies, so that they will have a stronger voice at higher levels in REDD+ decision making (p. 13).

b. Is there a system for independent monitoring, assessment and review of REDD implementation? Is the oversight system transparent, and how are civil society and other relevant stakeholders involved? (component 2c)

The R-PP states that National and Regional environmental protection agencies will be entrusted with monitoring, reporting, verification of sustainable forest management and compliance with and enforcement of policies, strategies and regulations (p. 137). The document also states that stakeholder discussions have decided that participatory monitoring and verification is the best approach for Ethiopia because it is participatory movements which have so far managed to reverse deforestation and degradation while top-down decisions have always failed. Furthermore, it asserts that all REDD+ activities, including domestic monitoring and verification should be opened to the advisory role of international verification, although no further details are provided (p. 127).

The proposal states that effective stakeholder representation is considered key to the validity of the consultation work. However, it states that most (not all) affected stakeholders will have to be continually sought out by the facilitator even if forest stakeholders are located in an inconvenient place, are a marginalized group or are considered to be conducting illegal activities. The criteria for selection of stakeholders to be consulted are not specified in the text, and therefore they are open to discrimination (p. 170).

3) Monitoring system

a. How will governance be monitored and assessed? (components 2c and 4b)

The proposal states that there will be a single, logical framework for REDD+ monitoring which will include both components 4a and 4b. The monitoring system will serve to monitor emissions from deforestation and forest degradation and the role of conservation and sustainable management of forests as well as the enhancement of forest carbon stocks. However, there is no mention of how or even whether governance will be monitored and assessed (p. 128).

The document does state, however, that Ethiopia would accept international verification of those components for which it has received financial, technological and capacity-building support (p. 127). Ethiopia would also welcome the verification of results for those components for which it has not received support, although the outcome of such verification will be used only for learning lessons (p. 127).

b. How will the environmental and social impacts of proposed actions be monitored and assessed? (component 4b)

The proposal states that information collection systems will be developed during R-PP implementation, to allow for the monitoring of the benefits that REDD+ initiatives provide to local forest-dependent communities (p.136). Information obtained in this way is to go beyond the standard carbon stock mapping and will be linked to activities conducted in the social and environmental impact assessment systems (p. 136).

Table 33 gives an overview of REDD monitoring indicators for different categories of REDD. Benefit sharing is the only “social” element for which monitoring is proposed, and the proposed indicator is a simple revenue calculation.

We note that biodiversity conservation and benefit sharing are defined as “REDD+”, which is inaccurate and inconsistent with the current international language.

c. What methods for data collection will be involved? Is the system independent, how will civil society be involved, and what measures will be taken to ensure that civil society has the capacity to participate meaningfully? (component 4b)

The proposal states that the EPA is already working on the mapping of forested areas through remote sensing, with input from the following independent monitors: Ethiopian Mapping Agency; Universities; Farm-Africa/SOS Sahel Ethiopia; NTFP-PFM Project; and Frankfurt Zoological Society. Moreover, some community based organisations have also been involved in some aspects of this work and are recognized as potentially suitable partners (p. 140).

Forest inventories are also being realized with input from independent and accredited body such as: FRC; IBC; Universities; ISD; Farm-Africa/SOS Sahel Ethiopia; NTFP-PFM project; and, Frankfurt Zoological Society. Similarly some community based organisations have also been involved in some aspects of this work and could be suitable partners (p. 140).

It is stated that the Ethiopian MRV system will be developed based on international best practice. The system will harness existing in-country experience and combine this with the development of innovative participatory approaches aimed at engaging communities in MRV work to build understanding and local ownership (p. 127).

d. How is monitoring and assessment linked with the SESA process? (component 2d)

The proposal highlights that the social and environmental impact mechanism will be integrated within components 2a, b and c. This is to ensure that all have SESA safeguards built into them as they are developed (p. 92).

The SESA will be based on the development of cross-cutting safeguards, which will ensure compliance of proposed REDD+ activities with World Bank Safeguard policies and will take the form of an Environment and Social Management Framework (ESMF) (p. 92).

There will also be an assessment or screening of the various REDD+ strategy options being pilot tested according to the principles, criteria and indicators of an ESMF (p. 94).

However, the only mention of possible links between the development and assessment of the ESMF and the monitoring system is contained in table 11 (REDD+ Strategy Options) which states that funding should be conditional on whether SESA guidance is observed and whether a participatory action research approach is applied, where key stakeholders are engaged in decision making, learning, and documenting lessons for knowledge sharing (p. 66).

e. How is it linked to MRV of emissions? (component 4a)

The proposal provides for a single, logical framework for REDD+ monitoring (reflected in merging both components 4a and 4b) (p. 129). The monitoring system, however, focuses on the monitoring of emissions from deforestation and forest degradation, and does not adequately address the monitoring of social and environmental benefits and impacts or how the different monitoring elements will be linked.

f. How will the results be fed back into the design and implementation of REDD?

The report states that feedback is an essential step in engaging and respecting stakeholders and it ensures that the REDD TWG are not perceived as simply extractors of information.

The proposal states that information about the effectiveness and equity impacts of REDD+

policies will need to be fed back into the implementation so that REDD+ strategy options and the policy institutional framework can be continually improved (p. 94).

Some participants have stressed that rather than starting new REDD+ pilots at great cost during implementation of the R-PP, it would be more efficient to focus on supporting existing pilot schemes in order to ensure that their lessons are fed into the REDD strategy development (p. 23).

Table 34 lists the Environmental Protection Authority as the agency responsible for formulation, compliance support, monitoring, reporting, verification of sustainable forest management and related national policies, strategies and regulations (p. 139).

4) Will the proposed Monitoring and Evaluation system assess the level of transparency, accountability, consultation, and stakeholder participation in the readiness process? (Component 6)

Table 36 lists the key Monitoring and Evaluation (M&E) indicators for each readiness activity (p. 143-145), while Table 39 shows the action plan for the M&E Framework (p. 149-150). The M&E Framework also assesses the newly set up financial and other resources management system through a national accounting and auditing system. The M&E is to also look at the effectiveness and transparency of the financial management system through the assessment of quality and content of financial and other resources management tools (p. 150).

The R-PP states very briefly that M&E should be participatory and that it be seen as a continuous process (p. 168). This would be crucial to learn from experience and to continuously improve on-going participatory processes. The document also recognises that in practice M&E tend to be neglected because their benefits are realized over the long term, especially when initial resources are scarce. Thus, it suggests that a clear understanding of the expected benefit of implementing an adequate M&E system is necessary to obtain the required resources (p. 168).

Madagascar R-PP (October 2010)

1) Illegality, corruption and law enforcement

- a. Does the proposal describe the role of weak law enforcement, illegality and corruption in driving deforestation and forest degradation? Does it identify the primary actors involved and where capacity needs to be increased? (component 2a)**

[Note- Reference to page numbers is to the English language version of the R-PP.]

Components 2a and 2b describe governance failures in the legal framework and technical references for authorising logging in Madagascar. It also recognises illegal logging and weak law enforcement as a cause of deforestation and forest degradation. This governance failure is

attributed to both weak surveillance capabilities of the forest administrators (lack of sufficient number of trained personnel) and corruption. The R-PP recognises corruption amongst “some agents (p.31) but does not identify the primary actors involved.

A graph (on p. 33) and table (on p. 31) presents the causes of deforestation and forest degradation, while another table (p. 32) gives an overview of degradation causes and deforestation rates per region (during the periods 1990-2000 and 2000-05).

The main drivers of deforestation are listed as (p. 28):

- Clearing of forests for subsistence agriculture
- Clearing of spiny and dry forests for commercial agriculture by influential individuals

The underlying drivers are also recognised as:

- Fast population growth
- Unsustainable agriculture
- Poverty and precarious livelihoods
- Lack of financial incentives for sustainable resource use

The main drivers of forest degradation are listed as (p. 30):

- Unsustainable and illegal logging
- Use of forest land for pastures (that is allowing live stock to graze in forests)

The underlying drivers are also acknowledged as:

- Repeated political and economic crises in the country
- Low conversion rates in transformation industry
- Lack of professionalism and human resources in forest administration

Drivers of both deforestation and forest degradation are listed as (p. 31)

- Governance failure – corruption, weak law enforcement
- Fuel wood consumption

b. What measures are proposed to address these issues? Is there an assessment of the institutional capacity to carry out these measures? (component 2b)

There are 3 strategic options proposed in the R-PP to address the drivers of deforestation and forest degradation:

1. Improving forest governance- this is proposed as a strategy to address defaults, sources of law violation, non-controlling of illicit holdings and failure to control forest activities.

The R-PP recognises the need for capacity building to fulfil this strategy objective. It involves interventions to revise forest regulations, and strengthening the fight against corruption and money laundering. Institutional measures focus on consolidating the

existing “independent” intelligence and control bodies (p. 47). Although these bodies are formally independent they do report to the government. The need for these bodies to be truly independent of government is not considered in the R-PP.

2. Development of a strategy to manage free access to forests and forested land. It expressly focuses on maintaining existing carbon stocks through the improvement of the livelihood of forest populations and improving management of forest access. However, the R-PP’s focus is on the “edge of forest land” while recognising the need to increase the size of protected areas. The R-PP does not address the issue of people living in or around forests, in particular forests to be targeted as protected areas. The inclusion of marginalised groups (youth, women and migrants) in management of and access to natural resources is proposed as an intervention, although the R-PP does not indicate any practical measures or the feasibility of this strategy.
3. Development of alternatives to deforestation and degradation of forests aims at assisting populations “obliged to subsistence economy by producing food” in land close to the forests to improve farming practices through optimisation of agricultural techniques in the vicinity of forests, increasing income from forest resource management and promotion of environmental services, biodiversity management, ecotourism and diversification in the use of non timber forest products (NTFP); and improving efficiency in producing and using wood fuel and diversification of energy sources

Governance issues are also discussed under Component 2a (p. 37f), with recognition of the need to address failures in law enforcement and corruption in developing a REDD+ strategy. Issues to be addressed include:

- Unbalanced responsibilities and resources of the forest administration
- Ineffective devolution of responsibilities and resources
- Law enforcement
- Unreliable and unavailable information
- Corruption

The measures proposed are not detailed or specific, and, consequently, no assessment is made of institutional capacity to implement these measures.

2) Institutional and policy framework

a. How are relevant stakeholders engaged in implementation framework? (components 1a and 2c)

The R-PP refers to institutionalised consultation and participation of stakeholders, through meetings, seminars or local, regional and national workshops, direct discussions with communities and broadcasted discussions (via radio or TV) (p. 17).

According to the R-PP, stakeholder consultation was carried out at central level (amongst the Ministries of Environment and Forests, Agriculture and Livestock, Land Planning, Transport and subsidiary bodies; and with national and international NGOs and a Platform of community associations and organisations). Stakeholder consultation was also carried out at the regional level (through 7 separate regional consultations) with representatives from local communities managing natural resources, farmer organisations, water users associations, parents associations, traditional chiefs and religious leaders.

Major outcomes are reported as:

- Local communities wanted to see their roles in sustainable forest management improved
- There is an urgent need for capacity-building and improving communications between parties
- There was an insistence on dependence on forests with suggestions of socio-economic alternatives to improve community livelihoods while promoting conservation
- There is a lack of understanding of the legal framework (potentially resulting in illegal logging)
- Stakeholders were experiencing impunity of illegal loggers

Component 1a provides a REDD+ Readiness Coordination Platform (PCP-REDD+) with 28 members; 3 from Malagasy Civil Society, 2 representatives of community-based federations and 5 representatives of national environmental organisations.

Component 2c mentions the need to clarify legal ownership and ownership rights for forest carbon and to further assess the links between carbon rights and use of forest products (p. 57). It also prioritises alignment of customary rights and statutory rights in this context with emphasis on securing the rights of local communities.

The Component does not, however, define institutionalised participation of communities and civil society in the implementation of REDD+.

b. Is there a system for independent monitoring, assessment and review of REDD implementation? Is the oversight system transparent, and how are civil society and other relevant stakeholders involved? (component 2c)

The R-PP foresees a transparent financial audit system by independent auditors, such as international auditors or REDD+ co-financing entities (p. 58). The R-PP suggests that stakeholders will have access to information on received funding and generated revenues, and will be involved in evaluating the efficiency of revenue sharing and use, based on pre-defined indicators (p.58). The R-PP does not provide further detail on the role of stakeholders in this evaluation process.

3) Monitoring system

a. How will governance be monitored and assessed? (components 2c and 4b)

Component 4b recognizes that there should be monitoring and assessment of REDD+ benefits and impacts other than carbon. It also states (p.84) that there will be a special focus on governance monitoring, including monitoring of:

- (i) the roles of different institutions and actors;
- (ii) the accountability of the different institutions and actors;
- (iii) governance
- (iv) transparency.

There is recognition that these factors need to be taken into account from the inception of the design phase of the monitoring system, and throughout the implementation of the REDD+ strategy.

The R-PP also recognizes the need to utilize existing monitoring tools in the design of this monitoring system (p.85). The emphasis appears to be on existing national monitoring systems with no discussion on using international monitoring tools in the design of the monitoring system.

The R-PP also mentions the development of a governance monitoring system, involving “interactive participation ... where everyone (including potentially marginalized minority and vulnerable groups) will influence decision-making to establish a governance monitoring mechanism.” (p.85) However, no detail is provided on how this process will work, although there is mention of integration with the existing national anti-corruption structures (p. 85f).

b. How will the environmental and social impacts of proposed actions be monitored and assessed? (component 4b)

Component 4b sets out Madagascar’s intention to establish a monitoring system to monitor impacts of the environmental and social safeguards at local level “ideally in a fully independent way”. The R-PP indicates that the monitoring system is to look at:

- Biodiversity conservation
- Sustainability of environmental goods and services provided by forests
- Enhancement of well-being/livelihoods of populations living near forests

c. What methods for data collection will be involved? Is the system independent, how will civil society be involved, and what measures will be taken to ensure that civil society has the capacity to participate meaningfully? (component 4b)

There is no suggestion on how data would be collected or how the monitoring system will be implemented, particularly with regard to the stated involvement of communities and civil

society. Although the R-PP mentions “effective participation of local communities one of the foundations of the MRV system for REDD+ in Madagascar (and) therefore, they will be fully involved in the implementation of MRV systems”. However, no practical suggestions or assessment of the feasibility of such an ambitious idea are set out in the R-PP.

The R-PP indicates that the National Environmental Office will be responsible for data management in collaboration with the Ministry of Environment and Forests, National Statistics Institute and others. There is no mention of active, institutionalised participation of civil society in monitoring or of the need for an independent monitor.

The R-PP foresees an external verification in compliance with the CCBA recommendations (p. 87) – this however seems to (only) refer to carbon data collection and analysis.

d. How is monitoring and assessment linked with the SESA process? (component 2d)

The R-PP states that the SESA should include a Social Safeguard and Environmental Management Plan with potential impacts on populations affected by REDD+ strategy and assessment to be linked between environmental, social and socio-economic concerns (p. 63). Reference is made to World Bank’s OP 4.12 (involuntary resettlement), 4.04 (only usage rights allowed in natural habitats) and 4.01 (EIA). The R-PP does not, however, otherwise mention the need for public consultation or participation in monitoring and assessment.

e. How is it linked to MRV of emissions? (component 4a)

At various points, The RPP makes reference to lessons learnt from five pilot projects being undertaken in Madagascar. These pilot projects look not only at monitoring of carbon stocks but also evaluating experiences with governance (p.19), revenue sharing (p.57) and links with socio-economic variables (p.78). Otherwise there is no express mention in the R-PP of a link between MRV of emissions and non-carbon monitoring.

f. How will the results be fed back into the design and implementation of REDD?

This is not addressed in the R-PP.

4) Will the proposed Monitoring and Evaluation system assess the level of transparency, accountability, consultation, and stakeholder participation in the readiness process? (Component 6)

The R-PP foresees an assessment being made of the level of stakeholder participation, although it fails to define the objective of that assessment or its relevance to the development of the REDD+ mechanism.

1) Illegality, corruption and law enforcement

- a. Does the proposal describe the role of weak law enforcement, illegality and corruption in driving deforestation and forest degradation? Does it identify the primary actors involved and where capacity needs to be increased? (component 2a)**

Much of the data presented in Perú's previous version of the R-PP were from the year 2000. This latest draft version of the R-PP acknowledges that information about deforestation and forest degradation in Perú is out of date, and proposes producing updated information as a first step.

Likewise, the previous discussion about the drivers of deforestation and forest degradation, which was heavily criticised by several organisations (see for example the Civil Society Comments on Perú's R-PP of June 2010⁶), has now been acknowledged by proposing a thorough analysis of such drivers.

Corruption is not explicitly acknowledged as a driver of deforestation. The R-PP does however mention that Perú is currently in the process of producing, in a participatory way, an Anticorruption Plan for the Forest and Wildlife Sector, embedded in the Anticorruption National Plan. No further information is provided.

The need to strengthen institutional capacity is alluded to throughout the document. This includes, for example, building the capacity of the Ministry of the Environment to fulfil technical assistance requirements for regional REDD+ roundtables.

- b. What measures are proposed to address these issues? Is there an assessment of the institutional capacity to carry out these measures? (component 2b)**

As mentioned above, the R-PP suggests Perú will undertake two studies; one to obtain up-to-date information about the state of the Peruvian forests and, in particular, obtain information on the extent of deforestation and forest degradation, and a second study to gain an understanding of the drivers behind the deforestation and forest degradation. In addition, Perú also proposes undertaking a third study to analyse its previous attempts to tackle deforestation in Perú, to identify its successes and failures, and learn from its experiences.

Although Perú does not expressly acknowledge corruption as a driver of deforestation/degradation, this process of initial data collection and analysis should provide a useful first step in identifying the extent to which corruption, illegality and weak law

enforcement to play a role as drivers, thereby providing Perú with an opportunity to begin addressing these issues.

Perú intends to conserve 54 million hectares through a 'National Forest Conservation Programme to Mitigate Climate Change'. It is hoped the REDD+ mechanism will make a contribution towards these efforts. Perú has been selected as a pilot country under the Forest Investment Program (FIP).

Component 2b presents a table of the main challenges faced by the Peruvian forest sector, which include socio-political issues, information and dissemination challenges, capacity and financing and incentives. It suggests proposals for actions to address them, including *inter alia* a control and monitoring system of deforestation and forest degradation, strengthening institutional capacity and implementing a consultation and participation programme. A long list of existing activities aimed at reducing deforestation and forest degradation is introduced.

2) Institutional and policy framework

a. How are relevant stakeholders engaged in implementation framework? (components 1a and 2c)

The Peruvian Congress approved a 'Law on prior consultation' in May 2010, and the Executive has submitted its comments on it. It is expected this law will be discussed for approval in the next session in 2010-2011. This law is to address stakeholder consultation.

The R-PP explicitly acknowledges that:

- There are two different if related processes: an information and participation exercise (directed at broad stakeholders), and free, prior and informed consultation (directed at Indigenous Peoples), bearing in mind international commitments such as ILO 169.
- Participation of AIDSEP and CONAP (which are Indigenous Peoples organisations) is acknowledged as not necessarily equating to their approval of REDD+.
- There is a need to review free, prior and informed consultation mechanisms, so as to ensure the effective inclusion of Amazonian and Andean peoples in decision-making processes.

In 2009, a 'National Coordination Group for the Development of the Amazonian Peoples' was created. Three out of four roundtables established within this group have dealt with the following relevant issues: reviewing the forest law, establishing a consultation mechanism and producing a plan for Amazonian development.

The list of REDD+ stakeholders recognised in the R-PP has improved in structure and clarity since the earlier version of the R-PP. The R-PP also makes reference to the "REDD Group", which is a multi-stakeholder forum coordinated by DAR. It mainly comprises civil society organisations, though it is gradually including other actors, such as government representatives and even the private sector. The REDD Group is presented and acknowledged

as an important stakeholder in civil society participation in REDD+. An update on the Guyana meeting in June 2010 and what followed is also included in the R-PP.

The document does talk about “consent” in some instances. Page 33, for example, states “measures designed to promote REDD+ mechanisms will only be successful if they include significant participation, consultation and consent from forest-dependent groups”. This is supported by explicitly mentioning which legal instrument provides for all three rights (participation, consultation and consent). However, the next steps and activities planned include informing and consulting, but do not seek consent in any way.

b. Is there a system for independent monitoring, assessment and review of REDD implementation? Is the oversight system transparent, and how are civil society and other relevant stakeholders involved? (component 2c)

No system is alluded to specifically. The level of stakeholder involvement in REDD implementation and its monitoring is not explicitly mentioned, however there is an interdisciplinary civil society “REDD roundtable” which interacts with government institutions and which has three working groups: technical, economic and legal. This national REDD roundtable also supports the establishment of regional REDD roundtables, which are ‘on some occasions’ formally recognised by regional governments.

3) Monitoring system

a. How will governance be monitored and assessed? (components 2c and 4b)

The R-PP states that the Peruvian government is to promote the strengthening of forest governance. The R-PP goes on to present the principles for good forest governance in Perú, namely: promoting effective, decentralised and integrated participation of stakeholders in decision-making processes; managing conflicts and building consensus, on the basis of clearly defined responsibilities; and legal security and transparency. It goes on to suggest that these principles must be incorporated into the REDD+ strategy in order to overcome the reductionist approach of the forest resources and adopt an ecosystem vision of the management of forests which conserves the forest patrimony.

Component 4b (which did not exist in the previous version of the R-PP) has now been timidly included, though at only two and a half pages in length it lacks detail. It mentions an intention to set up a system of monitoring which will work independently – but will be linked to – carbon monitoring. It also acknowledges that indicators to monitor co-benefits and other impact are yet to be defined. The proposed strategy is to build the system gradually, starting with basic indicators which will grow in complexity as capacity is strengthened.

It is suggested that three aspects be monitored: (i) biodiversity and environmental services; (ii) socio-economic aspects; and (iii) governance and institutional capacity. Activities to set up the system include establishing baselines, align existing indicators with those used to monitor these aspects and establish procedures so sub-national initiatives can also report on co-

benefits and other impacts. There is little discussion about how these activities will be carried out.

b. How will the environmental and social impacts of proposed actions be monitored and assessed? (component 4b)

The R-PP states that Perú does not have baselines on biodiversity, carbon, environmental or other services. It is proposed that these should be established, and only then will indicators and procedures for monitoring be developed. There is therefore no further discussion on how the environmental and social impacts of the proposed actions will be monitored or assessed.

c. What methods for data collection will be involved? Is the system independent, how will civil society be involved, and what measures will be taken to ensure that civil society has the capacity to participate meaningfully? (component 4b)

No detail is provided at this stage about the methods for data collection to be used or how these will allow for involvement of civil society.

d. How is monitoring and assessment linked with the SESA process? (component 2d)

Component 2d (Social and Environmental Impacts) states that the SESA will create a specific framework to ensure activities proposed in the R-PP will have the minimum impact possible both in social and environmental terms. It is expected that the SESA will help Perú determine social and environmental benefits and impacts, as well as risks and opportunities, which will in turn inform decisions about the choice of development strategies, with an emphasis on poverty alleviation and biodiversity conservation.

The R-PP proposes that through the SESA the assessment of environmental and social impacts of the REDD+ strategy will be integrated during the implementation of the activities proposed in the R-PP.

e. How is it linked to MRV of emissions? (component 4a)

It is proposed that the mechanism to monitor other impact and benefits operates independently from but be connected to the forest carbon monitoring system, though there is no further detail provided about how this will be carried out.

f. How will the results be fed back into the design and implementation of REDD?

This is not discussed in the R-PP.

4) Will the proposed Monitoring and Evaluation system assess the level of transparency, accountability, consultation, and stakeholder participation in the readiness process?

The stated purpose of Component 6 includes ensuring the transparent and efficient management of resources. The official REDD Technical Group is to be responsible for keeping stakeholders informed. Otherwise Component 6 does not mention participation, the consultation processes or accountability.

Viet Nam R-PP (October 2010)

1) Illegality, corruption and law enforcement

a. Does the proposal describe the role of weak law enforcement, illegality and corruption in driving deforestation and forest degradation? Does it identify the primary actors involved and where capacity needs to be increased? (component 2a)

Component 2a recognises that the main direct causes of deforestation are generally agreed to be a result of: (i) conversion to agriculturally cultivated land (particularly to industrial perennial crops); (ii) the impacts of infrastructure development and hydropower plans; (iii) unsustainable logging; and (iv) forest fires (p.29).

The most important direct cause of forest degradation in Vietnam in the last decades is cited as unsustainable logging, notably illegal logging (p. 31), which is mainly a result of poor management practices and/or illegal activities as well as timber harvesting by rural households for their consumption. The R-PP acknowledges that many violations of state regulations went undetected due to lack of monitoring, poor case handling and bad coordination with local authorities which discourages the provision of accurate and complete reports (p. 31). The document also recognises the widespread illegal conversion of land for agriculture as a major driver of deforestation, due to weak law enforcement (p. 30).

Deficiencies are also identified in the legal framework, which is considered ambiguous, over-complex and with loopholes that enable criminals to make easy financial gains with little risk of legal sanction. Some of the identified loopholes are: legal constraints to inspecting wood processors and sawmills and no required proof of legal provenance for imports of species not listed under CITES. Wood imports are thereby deemed legal even though they may have been illegally imported from elsewhere, in particular from Laos and Cambodia. Prosecutions are minimal and fines for forest crimes are extremely low relative to the gains that can accrue (p. 32).

Vietnam's enforcement strategy, focused on catching perpetrators violating forest laws in the proximity of the forest or subsequent transportation of the illegal timber, is deemed highly resource intensive requiring a large number of forest guards that are particularly vulnerable to

bribes. This strategy affects mainly local households dependent on the forest for their livelihood often leaving those who benefit most from forest crime, businessmen and local officials, unpunished (p. 32).

b. What measures are proposed to address these issues? Is there an assessment of the institutional capacity to carry out these measures? (component 2b)

The document indicates that a raft of policies, strategies and decrees to tackle corruption and illegality have been introduced to address these issues, most notably the *Law on Forest Protection and Development* and the establishment of a Forest Protection Department Task Team (p. 32). It is also felt that a strategy focusing on law enforcement at the point of sale (e.g. at saw mills, wood processing units etc) would address issues of supply and demand as well as tackling corruption within the forest guards (p. 33). Directives have been introduced to promote collaboration of the Forest Protection Department with other agencies but lack of financing and resources, conflicting legislation, policy or guidelines hamper proper coordination (p. 33).

As part of an effort to improve progress on Forest Law, Enforcement and Governance (FLEG), Vietnam and the European Commission (EC) have established a joint *FLEG-T (Trade) Working Group* and reached an agreement in August 2010 to prepare a Voluntary Partnership Agreement (VPA) with the EU's FLEGT initiative (p. 26).

Component 2b highlights a number of policies in need of examination. These include: (i) the extension of the current logging ban or the setting of low harvesting rates at provincial level; (ii) the introduction of legal requirements to show the origin of imported wood; and (iii) the closing of legal loopholes preventing detection, such as those deterring or preventing inspections of vehicles and/or saw mills. The document also recommends examining the current judicial system and provide recommendations on necessary changes to effectively punish perpetrators (p. 41)

Component 2c highlights recent experiences with community-based law enforcement that require assessment and translation into national regulations. It states that poor forest law enforcement may, in fact, leave stakeholders who are successful in reducing emissions unrewarded due to the non-performance of others who are responsible for illegal activities. Furthermore, it recommends that operational structures for effective forest law enforcement be produced, including a Central Forest Inspectorate with a hotline for reports on illegal operations and complaints about local law enforcement activities. The new General Department of Forestry and forest protection units at the district and provincial levels will need technical assistance to improve community law enforcement capacities (p. 50).

2) Institutional and policy framework

a. How are relevant stakeholders engaged in implementation framework? (components 1a and 2c)

Component 1a describes the National REDD Network, with a coordination role, and support to the development of REDD+ readiness (p.14). The Network is chaired by the Vice Minister of the Ministry of Agriculture and Rural Development who is also Chair of the Department of Forestry (DoF), and co-chaired by an international development partner on a rotation basis (p.12). A Technical Working Group (TWG) on REDD+ assists operations of the National REDD Network on technical and administrative aspects (p. 14).

Membership of the National REDD Network and TWG is open-ended and DoF has invited all interested stakeholders at any level to participate in the Network. Current members include representatives of various governmental departments; with voluntary participation by international development partners (such as JICA, GTZ, ADB, WB, Norwegian Embassy, Finnish Embassy, SNV and CARE international) encouraged, as is participation by research institutions, and national and international NGOs.

The R-PP states that there is no substantial involvement of the private sector and local communities at present because i) they may not see any direct benefits in the short term from participation in the Network; ii) the Network does not provide financial support for their participation (such as costs for travelling and accommodation), and iii) they might not have enough information on the REDD programme. (p. 12)

In order to promote the participation of these types of stakeholders, the DoF has launched public awareness campaigns and discussed with the UN-REDD Program and other potential partners to provide support. The DoF is also considering the establishment of sub-national REDD Networks and organization of meetings at regional and provincial levels to enable local communities and organizations to take parts in the REDD activities. In its pilot area – Lam Dong province – the UN-REDD Program in Vietnam has conducted FPIC exercise and organized numerous meetings with local stakeholders to introduce discussions on climate change and REDD. In addition, the DoF also promotes the activities of the Sub-Technical Working Group on Local REDD implementations that are aimed to encourage participation of private sector and local stakeholders. In particular these activities focus on: a sub-working group on REDD+ Governance; a sub-working group on REDD+ financing and benefit distribution; and a sub-working group on Local Implementation of REDD+, which aims to build on the lessons from ongoing REDD+ field projects (p. 14).

b. Is there a system for independent monitoring, assessment and review of REDD implementation? Is the oversight system transparent, and how are civil society and other relevant stakeholders involved? (component 2c)

Component 2c identifies the need to avoid conflicts of interest between the monitoring agency and recipients of REDD+ funding. It recommends establishing a REDD+ monitoring body to oversee and coordinate all REDD+ monitoring. Members of this body should come from the Government as well as from an independent financial auditing company, and Vietnamese civil society organizations. Such a body would be established both nationally and

provincially, with the provincial bodies responsible for monitoring down to the local level.

The R-PP indicates that an assessment of monitoring needs and costs through a review of current monitoring processes should be carried out and that results of this assessment would then be used to develop a detailed plan for national and provincial REDD+ monitoring (p. 49).

3) Monitoring system

a. How will governance be monitored and assessed? (components 2c and 4b)

Component 4b acknowledges the safeguards discussed in the UNFCCC as well as guidance from the AWG-LCA. The R-PP says that procedures will be integrated into the MRV system to monitor these safeguards. Although monitoring these safeguards necessarily includes monitoring governance (as one of the AWG-LCA safeguards), the R-PP principally emphasises the rights of Indigenous Peoples and local communities, conservation of biodiversity, ecosystem services and other social and environmental benefits, risk of reversals and risk of displacement of emissions (p. 72). No further detail is given.

b. How will the environmental and social impacts of proposed actions be monitored and assessed? (component 4b)

The R-PP lists relevant elements of the monitoring system for environmental and social impacts (p. 71):

- Monitoring of the safeguards as enumerated by the AWG-LCA, in particular those related to Indigenous Peoples and local communities, conservation of biodiversity, ecosystem services and other social and environmental benefits, risk of reversals and risk of displacement of emissions;
- Monitoring and evaluation of the effectiveness of the National REDD Programme itself, including social and environmental impact assessment;
- Support to the national, provincial and district Socio-economic Development Plans (SEDP), the principal planning instrument of the Government;
- Integration with other forest information systems in use by the Government.

However, the document fails to explain how such monitoring will be carried out.

c. What methods for data collection will be involved? Is the system independent, how will civil society be involved, and what measures will be taken to ensure that civil society has the capacity to participate meaningfully? (component 4b)

Data is to be collected using the same methods proposed by the UN-REDD Vietnam Programme. This Programme promotes the development of Participatory Carbon Monitoring for households, communes and Community Forest Management groups. Field data collection will be supplemented by satellite based monitoring (p. 10).

The R-PP says that local people are expected to be engaged in participatory monitoring, which is considered part of MRV. Local people are expected to play a role in monitoring emissions and are deemed especially valuable in identifying, reporting, and enforcing the interventions and tasks required for REDD (p. 50).

Participatory monitoring is to allow communities to record information about variables and events affecting their livelihoods, thereby creating a culture social control and acting as a catalyst for learning the cycle of planning, action, assessment, and learning. This will, in turn, provide a degree of comfort to investors that REDD+ is sustainable and builds confidence in the overall system and provides a sense of equity and transparency (p. 50).

However, the document recognises that there is limited experience with participatory forest monitoring approaches. It says different participatory monitoring methods are being reviewed and, based on this review, principles for participatory REDD+ monitoring should be introduced.

As previously stated the R-PP recommends establishing REDD+ monitoring body to oversee and coordinate all REDD+ monitoring. Members of this body should come from the Government as well as from an independent financial auditing company, and Vietnamese civil society organizations.

d. How is monitoring and assessment linked with the SESA process? (component 2d)

The SESA is expected to suggest a monitoring system that specifies responsibilities, reporting format etc. The monitoring system will identify indicators which should enable monitoring of the overall effects of the REDD+ implementation on key social and environmental issues. Such monitoring shall be linked to the monitoring of the specific projects/activities to be carried out within the REDD+ implementation (p. 55).

e. How is it linked to MRV of emissions? (component 4a)

The documents states that monitoring of carbon, monitoring of social impacts (benefit distribution system) and environmental impacts are based on management of all relevant data and information in a single (but distributed) information system. This integration opens up a host of possibilities for additional functionality, some of which are directly related to REDD+ and requiring no, or minimal, extra data (p. 71).

Procedures will be integrated into the MRV system to monitor these aspects, with emphasis on the rights of Indigenous Peoples and local communities, conservation of biodiversity, ecosystem services and other social and environmental benefits, risk of reversals and risk of displacement of emissions (p. 72).

Mainstreaming climate change and REDD+ in Socio-Economic Development Plans (SEDPs) is

supported by UNDP and UN-REDD respectively.

f. How will the results be fed back into the design and implementation of REDD?

The most important planning tool is the SEDP, which will be developed by the Government and all provincial authorities every 5 years, with annual updates and planning. The R-PP says that the MRV system should be very instrumental in providing guidance to the provincial authorities in the development forestry sector elements of new SEDPs and their annual updates, particularly at the provincial level, as well as in analyzing progress and evaluating the performance of the implementation of the SEDP in the forestry sector (p. 72).

4) Will the proposed Monitoring and Evaluation system assess the level of transparency, accountability, consultation, and stakeholder participation in the readiness process? (Component 6)

Component 6 states that the Monitoring and Evaluation (M&E) framework will monitor implementation of the *readiness* activities as outlined in the R-PP. It is thus separate from the monitoring system described in Component 4(a) and (b). In the course of REDD+ implementation, including the entire MRV and M&E process, specific performance indicators will be developed to monitor progress in implementation, impacts on carbon stock, social and environmental impacts, costs, and other impacts. Responsible stakeholders will be consulted during the process and feedback included in the evaluation process (p. 88). These activities are budgeted in 2011 and 2012.

The proposal states that an important function of the M&E process is to assess the transparency, accountability and equity of the National REDD Programme from the perspective of both participants and the international community. It asserts that the MRV system and its open access policies for relevant stakeholders will enable the M&E system to perform these functions in a way that instills confidence in the stakeholders (p. 72)

The M&E framework is summarized in Annex 6 at p. 139-143 which contains a thorough, but possibly underdeveloped, set of progress indicators. The document claims that the framework would also describe the means of verification and the risks and assumptions associated with each result, but no further details are given. The R-PP states that the activities carried out are proposed to be internally and externally audited to achieve transparency and objective results (p. 87). Independent (external) review is also budgeted for 2011-2013 (p. 88).

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