

Forest Carbon Partnership Facility (FCPF) Readiness Fund

Feedback Matrix for FMT Note 2011-14 Readiness Package Content and Assessment Approach

March 5, 2012

Includes feedback from:

REDD Countries: Colombia, Dem. Rep. Congo, Ethiopia, Kenya, Mexico, Suriname, Vietnam
Donor Countries: Canada, EC, Germany, Norway, USA
Observers: CIEL, EIA, FPP, Global Witness, RFN/BIC, WRI, WWF

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General/Overarching comments

Mexico	We believe that the notion of the R-package should start fairly general and be informed by the evolving international negotiations to ensure its compatibility with the eventual REDD+ regime. In our opinion, this would enable early carbon fund transactions to emerge, with its desirable environmental benefits and lessons learned, while allowing the FCPF to evolve as a more robust model in pace with readiness efforts. The current document is not only too specific and ambitious as an starting point, at a risk of over-interpreting the Cancun Agreements.
Mexico	The R-package is at the heart of the entire FCPF process and its definition will have profound implications for the participating REDD countries. We strongly believe that this merits an informed discussion and in that regard, we think it would be more useful to have a concept note with options and analysis, rather than the current document which contains a very specific proposal.
Mexico	Translation: We would like to bring to your attention the dissimilarities between the English and Spanish version of the concept note. We first reviewed the English version of the note because it came a week earlier than the Spanish version. While reading the Spanish version we realized that the content is not complete. In the Spanish version the partially meeting standards of each subcomponent are not included, neither the footnotes which give important definitions. Also, the <i>R-Package components: building on the R-PP framework</i> and the <i>Practical Considerations</i> sections were not translated. The note, at page 4 of the English version, emphasizes the importance of receiving feedback from REDD countries. For this purpose, it is important that the 3 versions are the same. We urge the FMT to complete the note translation so all participants have the same information.
Colombia	Translation: Colombia is working in a very engaged in the process of REDD readiness and notes with interest the results of the R-Package as a tool to determine the progress of a country in the readiness process. We review the Spanish version and found that there are some differences with the English version so the first point would be to ensure the same level of information between the three versions (including the French version).
Germany	Translation: Thank you also for the timely translation of the document into Spanish and French. However, considering the importance of the R-Package as a major FCPF product, we strongly recommend to translate the full contents of the FMT Note in order to facilitate discussion with REDD country representatives and observers.
Colombia	Since we have not finished reviewing the English version and there are differences with the Spanish version, we prefer not to send even comment on the standards set in each component and continue willing to continue to participate in these important discussions.
Mexico	We would like to kindly ask you to share with us and with all the PC members the main results from the different regional conference calls that you held with other countries. We have the impression that REDD+ countries haven't been actively participating in the discussions between PC meetings, and while we don't know why, we believe that the FMT should make an effort to understand the reasons. As a partnership among donor countries and REDD+ countries, we should be expecting equal participation of all the parties, in particular when the issues under discussion will have direct and very relevant impacts. It may be that the current discussion process is not suitable and may need to be reviewed in order to accommodate countries' capacities and needs.
Suriname	Although the document clearly reflects a great deal of high quality thinking that has gone into it, there are some concerns that I would raise when taking this document forward:

	Resource issue: who is going to pay for it. The current format appears to have quite high resource implications.
Suriname	<p>Political implications: as this document is likely to become something of a “standard” the chances of it being interpreted as “yet another barrier” for the initiation of REDD+ funding are deemed to be high. It is therefore important that the purpose of the document, and the way that the outcomes are interpreted are carefully assessed against the background of potential anti-REDD+ advocates.</p> <p>Again the outcome is clearly one that builds on the excellent work that has been put in both the RPP and the other learning that has come out of the FCPF, but caution should be exercised when creating and publishing this document that could ostensibly become “the standard” to determine a country’s eligibility for REDD+ financing.</p>
Kenya	<ul style="list-style-type: none"> - Content and scope is good, important that it builds on R-PP - Carbon Fund should not be the main focus of R-Package, but mainly related to REDD readiness more generally; quality of R-Package is important - R-Package and FCPF process need to provide assurance that country/Kenya is on the right track and getting ready for implementation
Ethiopia	<ul style="list-style-type: none"> - General comment: good logical flow, easy to comprehend; important that it builds on R-PP components and is in agreement with Cancun - Ethiopia would have to go to large piloting to be able to meet the standards - Some component standards (1 and 2 essentially) will be easier to reach than others, e.g. component 3+4 need comprehensive capacity building to be reached eventually (will take time); it would be good if component standards could be partially met at the sub-national level - Some large-scale investments are being planned (e.g. as part of the national strategy for a climate-resilient green economy); this will help the capacity building in relation to national management arrangements and strategy development - Ongoing piloting activities are funded by other development partners: not achieving a certain standard could jeopardize future funding; so timing is challenging and difficult, i.e. want to start working towards a standard, and at the same time some piloting may take place outside the FCPF or R-PP framework - Ethiopia has significant interest from development partners and donor: step-by-step requirements need to be in place to channel and structure funding – R-Package could serve that purpose
DRC	<p>[...] impact of getting readiness package approval for accessing different sources of funding is that:</p> <p>For moving from project finance to larger scale implementation of REDD+:</p> <ul style="list-style-type: none"> -pilot project alone whether or not they are geared to the voluntary or emerging compliance markets do not require the existence of an overarching framework -We may learn from pilot projects but they may not allow countries to put together all the components of the Readiness puzzle on a meaningful scale -The value added of the readiness package for the country is that it requires the existence of a roadmap that puts it all together, thus opening the door for larger scale interventions (sub-national) <p>Generally speaking approval of the readiness package will not significantly influence private sector involvement in my view, because private sector typically finances projects. The only requirement</p>

	<p>that I think will be crucial in the medium term as more and more projects come to existence is that of a "national geo---referenced tracking system or registry is operational and manages information on the location, ownership, carbon accounting"</p> <p>Approval of the readiness package may significantly help attract public funding or coordinating existing or already planned ODA interventions, all of which would be of tremendous help reducing deforestation.</p>
USA	<p>Thank you for the opportunity to comment on the R-Package concept note. We very much appreciate the progress that has been made since discussions in Berlin, and the work that was needed to make this happen. In general, we feel that the concept note is appropriate and consistent with the direction of the discussion among FCPF members.</p>
USA	<p>A broader concern, however, is what we feel there might still be some uncertainty about the ultimate use, and purpose, of the R-Package. This, in turn, will shape the content of the document itself. From the note, we understand that the R-Package is intended to be a "snapshot" of a country's progress towards REDD+ readiness at a given point in time. This is a valid objective, and we would support this. However, if this is the case it seems perhaps less appropriate to set out a "standard" which a country might meet or partially meet, especially as it is noted that countries will take very different approaches to readiness. (Thought the document says there is no minimum standard, we find it hard to understand how a standard might be "partially met" if there is no minimum.) Perhaps a more relevant interpretation of what here has been called a "standard" is a "goal," or "vision."</p>
USA	<p>If the R-Package is to be a "snapshot" of readiness, we do note that it may be used by instruments other than the FCPF. Again, we feel this would be positive, and would reduce the burden of different documentation often required by various funders or investors. We also note, however, that there will be a cost associated with the preparation of this document, and that this should be taken into account as decisions are made.</p>
Canada	<p>Thank you for the opportunity to input on FMT Note 2011-14 (R-Package concept note). This concept note ably summarizes the working group discussions in which Canada participated during PC9 and PC10. On the whole, Canada supports the framework and Components proposed to assess country progress towards their national Readiness with assistance the FCPF and other initiatives.</p>
Canada	<p>In moving forward towards PC12's adoption of an R-Package, it is clear that the next critical step for the note will be PC11 endorsement of this Framework and subsequently for the FMT/Working Group to develop criteria to assess the Components outlined in FMT Note 2011-14.</p>
Norway	<p>Norway would like to thank and congratulate FMT for the work that has been done with regards to the submitted Concept Note on the Readiness Package Content and Assessment Approach. The overall content of the Note is indeed in line with the discussions about the R-Package that took place in Berlin in October last year.</p>
Norway	<p>We support the idea of readiness as a continuous process that goes beyond the support received and activities undertaken directly under the FCPF readiness fund. As such, we would support that the R-Package builds on the standards from the R-PP when formulating goals/visions for readiness under each of the nine components.</p>
Norway	<p>We would like to underline the importance of coordination with other readiness frameworks/mechanisms, such as the UN-REDD.</p>
Norway	<p>The scope and the purpose of the R-Package could have been more clearly defined. We believe the R-Package could prove very helpful to REDD+ countries in structuring a path forward <u>that would prepare them eventually for the 'full implementation phase' (phase 3) where support is provided</u></p>

	solely on the basis of verified emission reductions. Further, we think the R-Package should assess preparedness across the various elements of REDD readiness over time towards this goal (rather than eligibility for the Carbon Fund – see below), by going beyond the activities directly supported by the FCPF (as the R-PP already does). As such the proposed assessment framework makes sense. Countries would be encouraged to have their R-Package assessed by the TAP/PC in order to receive feedback to improve further over time and to mobilize support from investors and donors. We would welcome REDD countries' views on how the R-Package could be most helpful in this regard, taking into account the good proposals from WRI, Germany and BIC/RFN on how to make the standards more operational. This should be balanced with the need to accommodate different approaches to readiness among countries.
Norway	That said, we also recognise that countries will – and indeed should be encouraged to – start implementing “no-regret” policies and measures and investments to address the drivers and underlying causes of forest emissions as soon as feasible while continuing to make progress on readiness, and without undermining such progress.
Norway	Norway would still like to retain the stipulation from the charter that the PC ‘endorses’ countries to be eligible for the carbon fund. However, if the R-Package is to provide a snapshot of the state of readiness towards a more ambitious, long-term goal of readiness (e.g., readiness for phase 3), we question whether requiring countries to ‘fully meet’ all or a ‘majority’ of the standards before starting to pilot payments for emission reductions is the best way to motivate further progress on readiness, or whether a separate process may be needed to assess whether significant / sufficient progress have been made to become eligible for the Carbon Fund. This could perhaps include a TAP review of the R-PP progress report in combination with the final ER-Program document(s).
Norway	According to the Note, the R-Package should among other things contain “a forward-looking part that specifies remaining activities needed to further promote REDD+ readiness and actions still being planned”. We suggest that the R-Package, as a ‘snap-shot’, should include a budget that shows the additional funds (if any) that are needed to finalize the remaining activities.
EC	The Readiness Package (R-Package) is a key milestone in the preparations of a country towards effective and efficient climate action in forests. In our view it should be explicitly anchored between the first and the second phase of REDD+ (as defined in decisions 1/C.P.16, paragraph 73). As such it is not only be designed as a gateway to the Carbon Fund (CF), but it sets a landmark for other large scale demonstration and capacity building activities that are expected to take place until 2020 , when the global regime (set in the Durban Platform's "legal instrument with legal force") will come into effect and be implemented from 2020. As a consequence, we think the UNREDD, the Collaborative Partnership on Forests, should be formally consulted and provide detailed input into this critical stage of assessing national readiness.
EC	The purpose of EC investment in the FCPF, as a demonstration activity, is to explore and generate lessons about the most effective and efficient ways to use climate financing to slow, halt and reverse deforestation and degradation in a sustainable manner. According to the Durban decision on REDD+ financing (-/CP.17, paragraphs 63-73): <ul style="list-style-type: none"> ○ results-based finance may come from a wide variety of sources, ○ in the light of experience gained from current and future demonstration activities, appropriate market based approaches could be developed by the COP to support results-based actions, ○ non-market based approaches, such as joint mitigation and adaptation approaches for the integral and sustainable management of forests could be developed, ○ the operating entities of the financial mechanism of the Convention (including the

	<p>Green Climate Fund) are encouraged to provide results-based finance for REDD+.</p> <p>We therefore encourage the FMT and the participants to the FCPF to design the process, incentives and standards attached to the CF and R-Package in a neutral manner so that the demonstration and capacity building activities they promote can inform and support any of these approaches. The FCPF should not preclude UNFCCC decisions on modalities and procedures for the full implementation of REDD+.</p>
EC	<p>As an Emission Reductions Program/Project (ERP) is a REDD+ demonstration activity, it should contribute to progress towards phase 3 measured through the R-Package. Therefore, the R-Package should be drafted and approved before the Emission Reduction Project Identification Note (ER-PIN), not the other way around.</p>
EC	<p>One critical element if the assessment of performance under REDD+ phase 2: The formulation of the purpose and scope of the R-Package leaves room for pilot projects that estimate reductions in deforestation and degradation on the basis of proxies. The FCPF can live up to its aim of being a pilot initiative that tries out different approaches, by testing programmes that estimate trends in emissions through innovative benchmarks, not limited to tCO₂ and reference levels (RL) when these appear flawed or disproportionately costly due to initial lack of capacities at national level.</p>
EC	<p>Depending on the situation of the Country/Regions where an ERP would take place the 12 elements in Box 1, p 6 may not have the same relative importance and some underlying aspects may need specific attention (objective information on policy approaches and impact of addressing the drivers of deforestation, or on the resources allocated to agencies in charge of oversight, tenure, governance and enforcement, for instance). In a competitive setting, a country identifying weak points in one or several of these thematic areas should not be considered as setting itself a handicap but as giving proof of its transparency and scrutiny, which helps identifying priority investments and addressing such bottlenecks.</p>
EC	<p>We think the R-Package (which in our view starts a process towards requirements for the third phase of REDD+) is a national framework that should be submitted, independently reviewed and assessed by participants and observers before the ER-PIN are submitted from a Country. Furthermore, the actions proposed in the ER-PIN should be framed by the R-Package and specifically by the national REDD+ strategy. It should inter alia ensure that the entity submitting the ERP operates in a clear tenure framework where the benefits and liabilities can clearly be affected to the right holders, and that affected populations can access an effective and responsive recourse mechanism if needed. If monitoring is considered at sub-national level, it should demonstrate how it contributes and nests into the national monitoring system.</p>
WRI	<p>The concept note demonstrates significant progress in articulating an ambitious vision for the R-Package. We appreciate that this draft clearly incorporates inputs from discussions with FCPF participants and stakeholders.</p> <p>We have provided several overarching comments on the concept note below, with the aim of encouraging greater clarity, consistency, and practicality. We also provide specific text recommendations in the following section.</p>
EIA	<p>The Concept Note should be easy to understand and make clear that R-Package will be compared to the “standard” or “vision” and a report prepared by the TAP which documents how far along the REDD country is on each of the components listed in the Concept Note in the “snapshot” of time memorialized in the R-Package will be formally reviewed by the PC.</p> <p>Having the R-Package be a “snapshot” of readiness will allow REDD countries to use the R-Package with other REDD financing entities. This will reduce the burden of REDD countries having to</p>

	prepare different documentation for various funders or investors and increase the number of REDD countries submitting R-Packages for consideration. We also note, however, that there will be a cost associated with the preparation of this document if it is going to fully describe all of the elements of the components listed in the Concept Note, and that this should be taken into account as decisions are made how to move forward with R-Package preparation and review.
EIA	The national and international processes need to be more clearly defined. The roles of the REDD country, the various stakeholders and institutions need to be further delineated. It is critical that stakeholders both be ensured full and effective participation in the development of the national REDD strategies and in the critique of the final national REDD strategies that are promulgated by the REDD countries.
EIA	The proposal that the mid-term report not be subject to a formal assessment is proposed for the first time in pp 19 of the Concept Note. This proposal should be brought to a full discussion of the PC. The mid-term report provides the PC with an extraordinary opportunity to make an early assessment of progress being made and to suggest mid-course corrections if the REDD country is not implementing its readiness activities in a manner consistent with the expectations of the FCPF. It could save substantial effort and money redirecting readiness activities at mid-term rather than at the R-Package stage when all of the known readiness funds will have been expended. To have a country go to the expense and effort of creating a mid-term report in a structure consistent with the R-Package and not provide formal feedback to that country seems like a substantial waste of effort, time, money and opportunity.
WWF	WWF appreciates the efforts of the FMT to develop the Concept Note on the content and assessment approach of the R-package (RP) and the opportunity to provide brief input at this stage. Given the decentralized manner in which the policy, practice and finance of REDD+ are evolving, we view the sound development of the RP and assessment as a crucial step toward significant scaling up in national finance for REDD+.
FPP	The comments are subdivided in three sections. FPP urges FMT to immediately address these concerns, and make an effort to reach out and consult with a wide range of indigenous peoples representatives and organizations in such a delicate matter.
FPP	<p>A. LACK OF CLARITY ON HOW NON-FCPF FUNDED ACTIVITIES WILL BE ASSESSED AND CONSIDERED IN THE READINESS PACKAGE</p> <p>The Concept Note states that <i>“the scope of the R-Package and its assessment by the PC, encompasses the complete set of activities performed in the context of readiness, not just FCPF-funded ones”</i>.</p> <p>Nevertheless, the draft does not provide any indication on how tools different from the SESA and ESMF such as the UNREDD SEPC and BeRT will be incorporated, since these would imply a different set of criteria and indicators to assess progress and compliance. The same would apply for cases where national level standards and criteria such as the REDD+ SE standards are adopted.</p> <p>Just to make one simple example, if the R-Package is supposed to encompass also UNREDD funded activities, the section on “Consultation - component 1: Organize and Consult”, will have to have an assessment of the modalities put in place to ensure indigenous peoples’ right to Free, Prior, Informed Consent. The same consideration applies for standard at page 11 according to which <i>“National REDD+ institutions and management arrangements are substantially and consistently engaging key stakeholders”</i>) and to component 1b “Consultation, Participation Outreach” (page 11) . Standard contained at page 12, refers to consultations and to “consensus building”, that is</p>

	<p>different from Free Prior Informed consent.</p> <p>In this situation it will be very hard to comment on how the Readiness Package draft/concept paper applies to other REDD readiness activities other than the FCPF- funded, and this is a significant shortcoming that will have to be addressed before the PC can duly consider the note for adoption.</p> <p>On another matter, the concept note clarifies that the R-Package does not necessarily represent the preliminary step to access the Carbon Fund, or “phase 3” of REDD and that the <i>“objective and mandate of the FCPF is not to design the eventual systems for phase 3”</i> (page 3).</p> <p>However, REDD countries, when preparing for REDD+ and implementing readiness plans and pilot projects will necessarily have a clear set of instruments to assess REDD+ benefits, be it in conjunction with future results-based payments or not. The Concept Paper also mentions - among the objectives of Readiness - that of ensuring <i>“consistency with UNFCCC emerging guidance”</i>. At the last COP 17 in Durban a clear consensus emerged among Parties that REDD+ benefits should be assessed not only in terms of carbon, but also in terms of biodiversity conservation, livelihoods and poverty alleviation.</p> <p>The draft concept note acknowledges the multiple benefits deriving from REDD, when in Standard at page 14 it refers to a <i>“comprehensive assessment of ... feasibility from a socio-economic, political and institutional perspective, costs and benefits in relation to peoples’ livelihoods and biodiversity”</i> while standard at page 19 refers to the <i>“identification of “non-carbon aspects of REDD+ implementation”</i>.</p> <p>Therefore, specific indicators will have to be developed to assist stakeholders and the Participant's Committee to assess the quality of measures and policies aimed at ensuring that the full range of REDD-related benefits will be captured. This would also include the necessary preconditions to allow (if the country decided to move on to phase 3) for an assessment of the broad array of results other than carbon upon which payments would be made.</p>
FPP	<p>B. NEED TO TAKE INTO ACCOUNT THE WHOLE SPECTRUM OF INDIGENOUS PEOPLES’ RIGHTS AND ASSESS THEIR DEGREE OF RECOGNITION AND IMPLEMENTATION ACCORDINGLY</p> <p>The section on the “Implementation framework”, (page 14) should take into due account progress in implementing the whole suite of Indigenous Peoples’ rights, in order to be compliant with the Cancun mandate that refer to the respect of rights and traditional knowledge of indigenous peoples, as well as to the FCPF Charter requirements that refer to the respect of indigenous peoples' rights. In fact, in spite of the FCPF Charter requirement to respect indigenous peoples’ rights, the section does not contain any specific reference to indigenous peoples. As matter of fact, it seems to be blind to the specific condition of indigenous peoples and the ensuing obligation to respect their rights, referring broadly to land tenure, carbon rights, distribution of benefits.</p> <p>In order to address this shortcoming, the Readiness Package should contain an assessment of the degree of implementation of indigenous peoples' rights, that would include an assessment of the degree of implementation of the safeguards (and of the related information system), but also of the level of REDD country’s compliance with international instruments and obligations including the UN Declaration on the Rights of Indigenous Peoples (UN DRIP) and ILO 169.</p> <p>In particular the R-Package should contain an assessment of the extent by which indigenous</p>

	<p>peoples' rights are being recognised and respected at the national level throughout the whole process (from design, to planning, and to decision-making, implementation, and MRV), with a view to evaluating the level of accomplishment of the preconditions ("milestones") to be set up for the Readiness and Implementation phases of REDD+.</p> <p>In the specific, the R-Package should include:</p> <ol style="list-style-type: none"> a. an assessment of the degree of implementation of the safeguards, and of the implementation framework with specific respect to rights; b. an assessment of actions undertaken to prevent harm to indigenous peoples taking into due account gender-related concerns; c. an assessment of the level of compliance of existing national legislation to international obligations and standards related to indigenous peoples and human rights such as the UNDRIP and ILO 169, and in particular: <ul style="list-style-type: none"> o Rights to land, territories and natural resources; o Right to Free Prior Informed Consent (FPIC); o Right to traditional knowledge and practices and customary sustainable resource use; o Right to self-determination and exercise of customary laws, governance and customary land use and forest management; o Right to full and effective consultation and participation in decision-making on matters that affect indigenous peoples and local communities, and timely access to adequate information in culturally appropriate manners; o Right to law enforcement and conflict resolution through traditional governance systems, with local monitoring and reporting of infringements; o Right to equitable benefit sharing. <p>These elements should be included in a set of "performance indicators" that will have to be developed and used in the assessment and validation of the R-Package. "Performance indicators" can serve the purpose of describing the situation at a given moment in time, and of providing data about planned or required policy and legal action that the REDD government will have to undertake.</p> <p>Additionally, verifiable indicators should be developed and applied to assess the potential loss of Indigenous peoples' traditional ecological knowledge with the purpose of preventing the possibility that REDD+ payments alter and undermine the traditional way of life and related knowledge and customary practices.</p> <p>All this information to be included in the R-Package is key to ensuring the robustness, reliability and effectiveness of the assessment while contributing to identifying capacity building and further technical assistance needs.</p>
FPP	<p>C. DEVELOP MODALITIES TO ENSURE INDIGENOUS PEOPLES' DIRECT PARTICIPATION IN ASSESSING READINESS AND VALIDATION OF THE R-PACKAGE, ALSO BY MEANS OF PARALLEL REPORTING</p> <p>The Concept Note acknowledges that Indigenous peoples can be engaged in participatory assessments, although this possibility seems to be limited to forest monitoring. (Page 17)</p>

	<p>FPP suggests that indigenous peoples' direct engagement in developing and adopting their own reporting frameworks to assess the level of advancement of human rights and indigenous peoples' rights be acknowledged and supported</p> <p>The ILO-UNPFII report of an international expert meeting on the theme held in 2011 [1] - for instance - proposes that</p> <p><i>"12. The (reporting) framework (on compliance with human rights obligations) should be elaborated in partnership with indigenous peoples, to reflect their visions and to ensure their full participation in the operationalisation and use of the framework, including in community-led assessment processes."</i>[2] and</p> <p><i>"21. Efforts should be made to encourage and enable indigenous peoples to undertake their own processes of assessing the implementation of their rights at local, national, regional and international levels. Such processes will inform indigenous peoples' own decision-making and also allow them to feed quality information into existing mechanisms, including UN treaty monitoring bodies, ILO supervisory mechanisms and specialized UN mechanisms such as the UN Special Rapporteur on the Rights of Indigenous Peoples, the EMRIP and the UNPFII as well as poverty reduction strategies, PRSPs, CCA-UNDAFs and other national policies and strategies."</i>[3]</p> <p>Hence, the R-Package assessment should include data and assessments from parallel reporting carried out by indigenous peoples with support duly provided in the national and international REDD+ programmes and activities.</p> <p>It should likewise contain information on the degree and modalities of indigenous peoples' participation in the definition of the assessment criteria and ToRs, and of their participation throughout the whole process of gathering, analysing, producing information that will be fed in into the R-Package</p> <p>In particular, Component 1b on Consultation, Participation and Outreach should explicitly include the possibility of indigenous peoples to participate directly in the assessment and validation of the R-Package as well as to provide their own reporting, based on their traditional knowledge.</p> <p>[1] UN Permanent Forum on Indigenous Issues. 10th session. Follow-up to the recommendations of the Permanent Forum: (a) Economic and Social Development - Report of the international technical expert meeting on "Keeping track – indicators, mechanisms and data for assessing the implementation of indigenous peoples' rights". E/C.19/2011/11 [2] ibidem, page 8 [3] ibidem, page 11</p>
WWF	Clarity is needed on what is meant by "positive assessment" or "favorable review" of the R-package as a prerequisite to signing an ERPA. Per our first comment, we do not think the RP template should implicitly determine specific standards for funding.
Global Witness	Stakeholder Participation: The Concept Note does not describe the expectations for stakeholder engagement in the development and assessment of R-Package. Standard 1b addresses how consultation, participation and outreach will be conducted during both the preparation and implementation of the R-PP, but it is unclear whether such standards also apply to the preparation of the R- Package. The Cancun safeguards require <i>"the full and effective participation of relevant stakeholders, in particular indigenous peoples and local communities"</i> during all phases of REDD.

	Preparation of the R-Package should be subject to this standard. Specifically, the draft of the R-Package should be shared with national stakeholders in order to solicit their feedback, and such feedback as well as the country's response to such feedback should be included as an Annex to the R-Package. This would enable a more accurate assessment of whether stakeholders have been properly engaged.
RFN+BIC	What would be the roles and competencies of the various stakeholders and institutions? There needs to be a national participatory multi-stakeholder process of self-assessment and evaluation to produce a national R-Package properly, as it signifies a major stock taking in the readiness phase in which governments and stakeholders are negotiating a complex set of policy reforms, institutional strengthening, strategies to address the drivers of deforestation as well as how to measure and report on it and share the potential benefits of REDD fairly and with effective means of resolving conflict and redressing grievance.
RFN+BIC	We believe that there must be a real, tangible opportunity for all relevant stakeholders to be heard in both the national and international parts of the process and for a well- designed, functioning grievance mechanism to be in place. Specific reference to the Cancun safeguards and ""The full and effective participation of relevant stakeholders, in particular, indigenous peoples and members of local communities..." should be made in the document. There needs to be broader and more effective outreach to Indigenous Peoples' organizations before the decision on R-package is made, if that outreach and dialogue can't happen by PC12, the decision should be postponed.
WWF	The Concept Note appropriately incorporates measures to ensure transparency and stakeholder involvement throughout its components; however, we think this could be further strengthened with a national-level stakeholder assessment as a compliment to any external review.

Scope and Content of the R- Package

Colombia	We agree with the statement in the "Purpose and scope" in connection with the assessment that would make the PC, which would include the full set of activities undertaken in the context of readiness, meaning by this that is not to assess the degree of progress of the RPP, but use the components of RPP to measure the progress of a country in the readiness process. In this regard, we would recommend that this section remain explicit that the R-Package is part of Stage 2 of the decision 1.CP/16 and that the scope of the proposed standards are aimed at determining the progress of a country according with the decisions of Cancún and Durban.
Mexico	The scope and purpose of the R-package needs to be clarified. In our opinion, the document presents the R-package both as a milestone for the purposes of the FCPF itself and as a broader readiness milestone for all REDD readiness efforts. While Mexico considers that the lessons learned from the FCPF may inform the negotiation and development of the international REDD regime, we believe that its current focus should be within its own logic, and aim to provide an assessment which is useful to determine eligibility into the carbon fund.
Germany	<i>On pp 5 (the purpose and scope of the R-Package):</i> We very much agree with that objective and support this formulation. However, it would be helpful to be more explicit on why the R-Package would be of interest also to countries that do not wish to access/ may not be eligible to the FCPF Carbon Fund. Although "other purposes" (self-assessment, credibility to other donors) still have to be explored and cannot be defined solely by the FCPF, the potential of their existence should be acknowledged here.
WWF	There is an overall lack of clarity about the purpose of the RP. In our view, it should be explicitly

	<p>stated that: a) the purpose of the RP is to provide a comprehensive report of progress and needs towards achieving national REDD+ readiness, and b) the RP template does not determine or prejudge any discrete benchmarks or standards for funding. Forest countries, donors, investors or funding bodies (including the Carbon Fund) may find the RP useful in assessing areas of need for finance and/or the progress of a REDD country in relation to agreed criteria; however, it is not the purpose of the RP framework to set these benchmarks. This will help inform but not compete with the phases being discussed in the UNFCCC.</p>
Global Witness	<p>The overall purpose of the Readiness Package remains ambiguous. The preamble to the Concept Note states that the Note presents “<i>a framework for assessing country progress towards REDD+ Readiness</i>” and that the approach entails “<i>the setting of a standards and a benchmark to assess progress towards meeting the standards.</i>” It is not clear what exactly the standards referred to here are meant to assess. However, in the section on Purpose and Scope (page 5), it is stated that R-Package “<i>has an important function to determine a country’s eligibility to participate in the Carbon Fund.</i>” Thus, two purposes are proposed for the R- Package – to assess a country’s progress towards REDD+ Readiness, and to determine a country’s eligibility to participate in the Carbon Fund. We do not think the approach outlined in the Concept Note would achieve either purpose effectively. It is not always clear to us whether an element of a given standard describes REDD+ Readiness or simply eligibility for the Carbon Fund. We suggest that the two purposes be separated into “Readiness Objectives” against which progress towards REDD+ Readiness can be assessed, and a “Carbon Fund Standard” that describes the level of progress expected on key elements of readiness before a country can enter into a Carbon Fund program. The former should not be seen as a standard that countries are expected to meet, but rather an aspirational benchmark against which to assess progress.</p> <p>We do not see the added value of elaborating a “partially met” standard if, as is indicated in the Concept Note, meeting such a standard means that the R-Package is not endorsed. Countries that do not receive endorsement of their R-Package will in any case benefit from feedback from TAPs and other reviewers, so formalizing a partially met standard does not appear to add value.</p>
CIEL	<p>Regarding the purpose and scope of the R-Package, there is a lack of clarity as to what purpose the document serves. The Concept Note describes that the R-Package will provide an “opportunity to take stock, draw on early lessons learned, document early results, assess remaining gaps and identify actions for the way forward.”¹ While these are aligned with the FCPF Charter and prior discussions on this issue, it is not clear how the R-Package will provide the basis on which a country is deemed to be REDD “ready” and thus eligible to participate in the Carbon Fund. The set of standards outlined in the Concept Note need to be further detailed, such as by including assessment criteria.</p>
CIEL	<p>With respect to what should be included in the R-Package, the Concept Note identifies four main components. However, given that the R-Package is intended to report on and document the progress made during the readiness phase, it should address all of the elements of the R-PP, including the Schedule and Budget and Monitoring and Evaluation Framework used to monitor the implementation of readiness activities. In the interests of transparency and accountability, it would be useful for countries to provide financial information to determine whether readiness funds were spent efficiently and effectively and to help identify where additional resources will be needed. Similarly, information on a country’s monitoring and evaluation framework and how it was applied to readiness activities will help to inform the development of monitoring systems in subsequent phases.</p>
CIEL	<p>The multi-stakeholder assessment referenced in the Concept Note is another important issue</p>

¹ FMT Note 2011-14, at 5.

	<p>that requires further clarification, considering that it is unclear what process will be required of countries in preparing the R-Package. Many questions remain as to who qualifies as a stakeholder, how stakeholders should be involved, and how their input should be taken into account.</p>
EIA	<p>The Concept Note does not clearly define the ultimate objective and purpose of the R-Package. The Concept Note states as follows:</p> <p>The objective of the R-Package is to demonstrate that activities are tested within a transparent framework and social and environmental risks are mitigated, and as such provides confidence to national and international actors that the country is making progress on REDD+.</p> <p>We are not sure exactly what this means.</p> <p>It was our understanding that the R-package is supposed to document the REDD country's state of readiness to conduct REDD+ activities at the time of submitting the R-Package, and to demonstrate 1) that "readiness" activities have been developed within a transparent framework and 2) that social and environmental risk have been identified and been eliminated or mitigated. It is also our understanding from informal consultation with FMT staff that the R-Package is the Participants Committee's (PC) opportunity to evaluate the documents and processes that have been developed during the implementation of the Readiness Grant including the Strategic Environmental and Social Assessment (SESA); the Environmental and Social Management Frameworks (ESMF); the national REDD strategy and implementation framework; the monitoring, reporting and verification (MRV) systems; the baselines and reference levels (REL/RFL); and the grievance mechanisms established and ensure that they are consistent with policies and guidance established by the FCPF. While these issues are to be evaluated in connection with overall "readiness" there is no mention in the Concept Note that the PC is going to evaluate how the Readiness Grant was spent and whether the results of the readiness process are consistent FCPF policies and guidance.</p> <p>If this latter point is going to be a separate process that occurs whether or not a REDD country chooses to submit an R-Package then this process needs to be described and submitted for public review and comment. If it is going to be an independent part of the evaluation of the R-package, the process and standard employed needs to be described in the Concept Note. The Common Approach states as follows:</p> <p>12. When the FCPF Readiness Preparation grant is fully disbursed, the DP [Delivery Partner] files a completion report to report on Readiness Preparation progress and grant completion, including on compliance with the Common Approach. The completion report is disclosed, in compliance with the FCPF Guidance on Disclosure of Information.</p> <p>13. If the Country expresses interest in obtaining PC endorsement of its R-Package, the PC considers the R-Package, its review by an ad hoc Technical Advisory Panel (TAP), the DP's updated monitoring report, or completion report if available, and/or other sources, as appropriate, including for those REDD Country Participants that are not supported by a DP, to form an opinion about the Country's progress towards REDD+ readiness and compliance of the activities funded by the FCPF grant with the applicable policies and procedures (including safeguards) of the DP and the Common Approach, the risks involved, and other factors as necessary. (Emphasis added.)</p>

	<p>What is going to happen with the Delivery Partner Report? What level of review is going to be undertaken by the PC of the DP Report? What is going to happen in the review of the DP Report or the review of the R-Package if it is found that the SESA, ESMF, national strategy, MRV, REL/RL and grievance mechanisms are not in “compliance with the Common Approach” and FCPF policy and guidance? At present, the Concept Note is silent on the review and critique of the FCPF funded documents and processes.</p>
EIA	<p>The objective and intended use of the R-package will shape its content so it is essential that there is a common understanding before the Concept note is finalized. From the text of the Concept Note, we understand that the R-Package is intended to be a “snapshot” of a REDD country’s progress towards REDD+ readiness at the time the R-Package is submitted. This is a valid objective, which we support. The “standard” then becomes a goal or vision that countries should continue to strive to achieve, updating the R-Package as significant progress is made. Some countries may meet the Standard with their initial submission, but most will likely have to continue readiness preparation activities, particularly on issues such as land tenure which are not likely to be resolved in the 2-3 years of the implementation of the Readiness Grant. The Concept Note does not deal with the likely occurrence that some REDD countries will not have met the “vision” of “readiness” set forth in the Concept Note and what process and funding the FCPF is going to put in place to assist REDD countries that are striving to achieve the Concept Note’s vision of “readiness”.</p>
EIA	<p>EIA supports the idea of having the components of the R-Package build directly upon the components used for R-PPs. However, after all of the work and multiple reviews that the R-PPs have been through, it is unclear why the review of the R-Package would not assess whether the activities stated in the final R-PPs were actually implemented. There can be all sorts of reasons that the REDD country’s REDD readiness plan changed during readiness implementation, but not to look at the R-PPs and evaluate the progress made and the activities originally envisioned, discards from a huge body of work which would shed light on whether the progress made is substantial and consistent with a reasoned REDD readiness plan. We would encourage the use of R-PPs in the evaluation process not as the ultimate measure of whether the country is “ready for REDD” but as a tool to evaluate how much progress on readiness has in fact been made.</p>
Global Witness	<p>Country progress towards REDD+ Readiness (defined as readiness for phase 3 finance) should be assessed relative to “Readiness Objectives” as described by the nine components proposed in the Concept Note. We find the scope of these nine components to be adequate, although in our view some of the elements fall short of describing full REDD+ Readiness, and rather seem to be describing where a country should be at the time it enters the. These inconsistencies should be worked out so that the Readiness Objectives consistently describe readiness and not intermediary states. We strongly recommend disaggregating the elements of each component so that they can be individually assessed. Many of these elements are important in their own right and warrant individual consideration, and some of the components cover a wide range of elements that it does not make sense to consider in aggregate. The assessment of progress against Readiness Objectives should be carried out with the expectation that countries may not have achieved some or even most of the objectives at the time they submit their R-Package. The purpose, as described in the Concept Note, is to get a “snapshot” of where countries are at and identify gaps where additional support and work is needed.</p>
USA	<p><i>On pp 5 (the purpose and scope of the R-Package): The objective of the R-Package is to demonstrate that activities are tested within a transparent framework and social and environmental risks are mitigated</i></p>

	<p>Edits: "The R-Package is an important benchmark in a long-term process that requires learning and capacity-building through piloting"</p> <p>On pp 5; continued capacity building: We suggest the following edit: "for continued technical and institutional capacity building"</p>
WRI	<p>Page 5, paragraph 1, sentence 2</p> <p>We propose the following edits to clarify the objective of the R-Package: "The objective of the R-Package is to enable REDD+ countries to transparently track progress, document achievements, and identify outstanding needs in the readiness process. As such, the R-Package will provide confidence to national and international actors that the country is making progress on REDD+ and that social and environmental risks are mitigated."</p>
WRI	<p>Page 5, paragraph 3, sentence 1</p> <p>We recommend that the phrase "whether a country is making progress" is replaced with "how much progress has been made."</p>
WRI	<p>Page 5, all sentences pertaining to the Carbon Fund</p> <p>The final two sentences of paragraph 3 and the entirety of paragraph 4 discuss the relationship between the R-Package and the Carbon Fund. Following our broader recommendation that the design of the RPackage design should be de-linked from considerations of Carbon Fund eligibility, we recommend that this information be presented in a separate text box. This will help the reader draw a clear distinction between the overarching objectives and scope of the R-Package, and the specific, additional objectives related to the Carbon Fund.</p>
EIA	<p>P 5, 2nd line, 5th full para.</p> <p>The concept and purpose of the "benchmark" needs further elaboration. Is it the "vision" that REDD countries should be aiming for when they submit their R-Packages? What is required for those readiness activities which cannot be completed during the implementation of the Readiness Grant? Will the "benchmark" change based on experience gained by the FCPF as the R-PP template did? Is there a process within the FCPF which will enable REDD countries to continue to have their "forward progress" monitored as further readiness activities take place? Will this be required by the FCPF of its participants to ensure that deficiencies or longer term readiness activities are actually corrected and/or carried out? For example, if an R-packages describes a process for resolving land tenure issues, will the REDD countries have to report that the system is adequately funded, and working in a timely and transparent fashion to continue participating in the FCPF?</p>
WRI	<p>Pages 5, final sentence; page 6, first sentence</p> <p>We recommend that the "two general stages of readiness" should be de-linked from carbon fund eligibility, and that they be revised to avoid implications that "further development" is only necessary in the lower stage.</p> <p>"1. Significant progress towards readiness; some readiness components require further development"</p> <p>"2. Progress towards readiness; most readiness components require further development"</p>
USA	<p><i>On page 6 top bullet: "Significant progress towards Readiness but requiring further development of some key readiness components"</i></p> <p>In order to reduce the burden on REDD+ countries, as well as the FMT and TAP, we believe a country should be encouraged to submit their R-Package only once they believe significant progress has been made and they have met all key readiness components.</p>

EIA	<p>P 6, 1st line, Carry-over para. The Concept Note fails to establish what happens and whether additional readiness funding will be available if an R-Package is found to document:</p> <p>“2. “Significant progress towards Readiness but requiring further development of some key readiness components”.</p>
WRI	<p>Page 6, paragraph 1 We recommend referencing that the R-PP framework has also been endorsed by the UN-REDD Programme.</p>
USA	<p><i>On page 6, title of component 4:</i> We believe that systems to report and verify should also be included here to complete MRV.</p>
Germany	<p><i>On pp 7 last paragraph:</i> Please acknowledge COP 17 elements as well and clarify the relationship between ESMF, the monitoring system for multiple benefits, governance and safeguards and the Cancun system of information on safeguards.</p>
USA	<p><i>On pp 7 last paragraph:</i> <i>These safeguards are consistent with the seven Cancun safeguards, and go further in several important aspects.</i></p> <p>We generally agree, but there are a few Cancun safeguards (reversals, leakage) for which there is less clear correlation. We may want to discuss how this should be addressed, for example through a short table mapping Common Approach Safeguards, Cancun Safeguards, and noting the correlations.</p>
EIA	<p>P 7, 11th line, last para. The Concept states: “These safeguards are consistent with the seven Cancun safeguards, and go further in several important aspects.” While these safeguards may be consistent, the Cancun Safeguards go further than the World Bank Safeguards in many important respects. During the discussions of the safeguards in the Common approach Task Force, the Cancun Safeguards were specifically not included as they had just been adopted and need further clarification in the UNFCCC process which has now occurred. As a result, the Concept Note should specifically ensure that the Cancun safeguards are considered such as the use of FPIC, and the protection of virgin forests to mention just two. This comment also applies to the 1st paragraph of page 9, and Components 1a, 1b, 2a and 2b.</p>
Germany	<p><i>On pp 8 Table 1:</i> Please clarify the relation between 1a. and 2c., there seems to be either considerable overlap between the two or a clear differentiation of responsibilities and the levels of decision-making/regulation and technical implementation need to be further explained.</p>
WRI	<p>Page 8, paragraph 1 (below table 1) We recommend revising and augmenting this paragraph to provide a more concrete picture of what an R-Package will look like, and what developing an R-Package will entail. “The R-Package will represent a country’s self-assessment of progress made during the Readiness preparation phase on analytical work, capacity building, consultation, and early implementation of actions. As such, the R-Package should synthesize and critically reflect on major achievements, outcomes, and outstanding gaps and challenges. Related outputs (e.g. results of studies, records of consultations, other official documents) may be included as annexes, but should not comprise the main body of the R-Package. The FMT will consider the need for an R-Package template and related assessment guidance to facilitate the preparation of the R-Package.”</p>
USA	<p><i>On pp 8; 3rd bullet of the last paragraph:</i> <i>potential emissions reduction activities</i></p>

	Many of these are already ongoing (voluntary market projects, pilot projects). It would be helpful to identify these as well.
Germany	<i>On pp 8; 3rd bullet of the last paragraph: Preliminary identification...</i> "Preliminary identification" sounds even weaker than what was required as a standard in the RPP Template. Something more concrete should be expected at the time a country submits its R-Package, while acknowledging that activities need to be adaptive to changes.
Germany	<i>On pp 9; top bullet:</i> "may occur" is too vague for supporting PC endorsement of a country's R-Package. Draft policies/regulations that have been submitted to the legislative body. It is also likely, that substantial external funding for the implementation of a strategy will only occur when relevant regulations are put in place and provide some level of security for investments.

Assessment Approach and R-Package Component Standards

Vietnam	<p>1. The use of standard and partially meeting standard are abstract and does not distinguish levels of REDD readiness as all components are complex and consist of a wide range of activities and results. Therefore, the assessment may not be objective and shows actual status.</p> <p>2. When the readiness of a country is assessed, it also needs to take into account some factors; for example, duration and resources have been spent. If the REDD+ preparation has just conducted for a short time with limited resources but has gained significant results, the achievement should be highly evaluated. It means that the effectiveness and sufficiency are additional criteria.</p> <p>[...]</p>
Suriname	<p>Assessment approach: on page 9 the document starts out with the correct recognition of the fact that there is no "one size fits all" readiness formula, but the approach quickly becomes one of meeting the standard, or partially meeting the standard, where "partially" meeting the standard, excludes the country from participating in the Carbon fund.</p> <p>This clearly turns the assessment approach into one that serves to exclude countries from participation in the Carbon Fund. As this standard is likely to be adopted by other partner/donor countries, the risk is then introduced that countries not meeting the R-package standard will not be able to get REDD+ financing anywhere, which in turn could lead to fewer countries participating in the mechanism, and thereby a smaller portion of the world's forests benefiting from the protection that the REDD+ mechanism has to offer. It might be worth considering softening this approach and making the outcome more of a "quality" assessment as opposed to an "eligibility" assessment. Perhaps it might be worth considering to link "meeting" the standard to a price premium, and "partially meeting the standard" to a lower price that would reflect the level of REDD+ maturity within the country.</p>
Kenya	<ul style="list-style-type: none"> - For assessment process: perform in-country assessment (e.g. mission); TAP relies too heavily on desk-review and incomplete information; PC relies too heavily on TAP assessment; e.g., could generate mission report as input to assessment process - TAP should identify the gaps/shortcomings and inform PC assessment – this would guide the Readiness preparations going forward - Many standards (as proposed) are too ambitious and to meet them would require actual implementation; Carbon Fund is designed to continue preparation and testing of approaches

	<ul style="list-style-type: none"> - Would prefer a 'grading system' based on multiple levels of readiness and component specific guidance in template format. The intermediate steps could be described in more detail - The assessment provides confidence for further investments and helps report back to constituencies and attract more REDD finance (as a good assessment would demonstrate seriousness and commitment of the REDD country) - Would be desirable to have a common R-Package (just for R-PP) as it would simplify reporting and compliance with UNFCCC – going back to Bali: UN-REDD and FCPF were originally designed/created in response to COP request
EC	The proposed assessment approach, as explained on page 9, reflects to a large extent our understanding of the R-Package as a multidimensional country specific framework for assessing progress in preparing for and establishing the capacity to implement REDD+ actions. The focus on benchmarks and standards is appropriate.
EC	Nonetheless, countries presenting their R-Package should ensure the transparency and evidence based nature of their self assessment at this point in time, and be ready to reassess progress periodically. The R-Package should help to identify priorities for improvement and SMART² indicators of progress that can be used to assess future national performance in curbing deforestation and forest degradation.
EC	Overall the standards proposed capture useful lessons and criteria to inform REDD+ demonstration based activities. We feel however they do not build enough on the REDD+ framework set in UNFCCC decisions 4/CP15, 1/CP16 and 1/CP17 that contains more than the 4 elements in table 1, p8. However we appreciate that the linkage is made more explicit in this version.
EC	The general characteristics of the R-Package and the sub-sections on the specific "standards" are relevant and well drafted. The assessment of "land use, land use change drivers, forest law, policy and governance" referred to on pp12-13 is a very important part of the strategy preparation. However, it should be followed through the later stages of phase 2. For example, the analysis and action plans prepared in phase 1 should be reviewed periodically, and possible adjustments may have to be considered. This implies an assessment of progress in relevant policies / legislation, their implementation and the use of incentives to promote sustainable land use and sustainable use of resources. This would show how a country positions itself in relation to REDD+ objectives and how it expects to improve over time.
EC	When quantified performance indicators (ER estimates, or otherwise) are considered, an indication of the uncertainty (confidence interval) of current and target levels should also be given.
Canada	In developing criteria Canada is of the opinion that the Standards outlined in the Note will need to be refined with regard to the level of progress that needs to be demonstrated: ie the adjective used to demonstrate whether a country has "significant" achievement of any standard will depend upon the Criteria and Indicators used to assess said Standard.
Canada	Given the broad spectrum of Criteria & Indicator processes that already exist internationally, Canada encourages the adoption or adaptation of existing Criteria & Indicators to assess relevant standards of the R-Package.
Canada	Use of existing indicators, where appropriate, will reduce the incremental reporting burden of the R-Package on REDD+ countries and thereby aligns with both the recent discussions of the FAO, UNFF and C&I organizations to streamline reporting processes and acknowledges concerns

² Specific, Measurable, Achievable, Relevant, Time-bound

	previously raised by several FCPF working group participants.
Germany	We generally welcome the proposed review process and structure of 9 standards, although we do have questions and suggestions for further improvement.
Germany	We agree with the need for a manageable number of benchmarks that can be operationalized and communicated to a diversity of stakeholder groups. However, in their present form, the nine qualitative "standards" are very complex and every one of them encompasses a larger number of sub-elements that have to be in place in order to meet the standard. Thus, we already have more than only 9 benchmarks. Also, it is not clear whether a standard can be considered as "met" even if not all qualitative sub-elements have been achieved. This introduces a considerable level of discretion and reduces the transparency of the assessment process.
Germany	<p>As regards the purpose of the R-Package, we still perceive some lack of clarity. In our view, the R-Package and its assessment by the PC serves three purposes:</p> <ol style="list-style-type: none"> 1) define eligibility for the Carbon Fund as it is stated in the FCPF charter 2) provide a benchmark/self-assessment tool for countries to facilitate multi-stakeholder learning for progress towards Readiness 3) by PC endorsement provide confidence to other financing sources about a country's Readiness progress <p>We think that the use of the term "minimum standard" can be confusing, especially with the semantic connotation of a lower-level quality as it is used in the FMT Note. However, we do support the notion of the R-Package being an ambitious yet not optimal/ideal standard, as it is outlined by the FMT Note. To our understanding the minimum requirement to become eligible to the Carbon Fund would be to meet that ambitious standard.</p>
Germany	We welcome the differentiation between only 2 levels of achievement ("met" and "partially met") as opposed to 3 levels as used for the R-PP reviews ("met", "largely met" and "partially met"). However, we believe that more detailed descriptions for the two levels may be necessary in order to enable objective judgements by stakeholders, the TAP, and PC members. In some cases the differentiation between "met" and "partially met" only consists of the absence of an adjective, e.g. 2a) Assessment of Land Use "Standard = A <i>complete</i> analysis / Partially met = A analysis" or 2b) REDD Strategy Options "Standard = A <i>comprehensive</i> assessment / Partially met = An assessment". This makes it hard to give objective and transparent judgments and does not facilitate learning during Readiness.
Germany	Thus, in our view, the set of nine standards only helps to structure the assessment of a country's Readiness but it cannot and should not reduce its complexity. We think that more detailed guidance on the individual standards (as suggested e.g. by WRI) is necessary in order to allow for objective and comparable judgements within a multi-stakeholder review and in order to enable the PC to make a balanced judgement when endorsing a country's R-Package. Furthermore, transparent rules have to be defined as to how many sub-elements need to be "met" for the standard to be "met". The detailed qualitative descriptions of sub-elements could be part of the Assessment Standards themselves, a separate R-Package Assessment Guide or it could be part of the R-Package Template, but it should be well-structured and easily comprehensible for a wide range of stakeholders ³ . From our experience as PC reviewers during the R-PP assessments, we would very much welcome more detailed assessment guidance.
Germany	We realize that a less rigorous approach has been used for the R-PP reviews up to today, but we think that the R-Package assessment should have a more robust and objective methodology considering its potential scope and impact. Such an approach has been successfully applied by

³ The current R-PP Template of 75 pages is too voluminous in order to be a useful reference for a wide range of stakeholders or PC reviewers.

	past forest policy initiatives, such as the NFP-Facility to monitor progress of the various country processes and as well in countries piloting the implementation of the NLBI, e.g. Ghana.																																																														
Germany	<p>Introducing a scoring system may be worthwhile to consider since it might facilitate the identification of priority actions and could be an attractive way of communicating a country's progress towards Readiness to potential donors and the international community.</p> <p>Example:</p> <table border="1"> <thead> <tr> <th>9 Standards</th> <th>6 Sub-elements/Standard (Total 54 Sub-elements)</th> <th>Detailed qualitative description (based on R-PP Template)</th> <th>Achievement Scoring</th> </tr> </thead> <tbody> <tr> <td>1a) National REDD management arrangements</td> <td>Stakeholder engagement in national REDD+ institutions and management arrangements</td> <td>All key stakeholders are substantially and consistently engaged. (Define substantially + consistently, e.g. information is consistently and transparently shared)</td> <td>Met 2</td> </tr> <tr> <td></td> <td></td> <td>Stakeholder engagement is happening, but is not consistent and substantial (information is not always timely, accessible, comprehensible), or not all key stakeholder groups are engaged.</td> <td>Partially met 1</td> </tr> <tr> <td></td> <td></td> <td>No stakeholder engagement.</td> <td>Not met 0</td> </tr> <tr> <td></td> <td>Effective management of Readiness</td> <td>Institutions have a formal mandate and a sufficient budget for Readiness management. They carry out all major responsibilities (define).</td> <td>Met 2</td> </tr> <tr> <td></td> <td></td> <td>Institutions carry out some of the major Readiness responsibilities but not all, due to a lack of formal mandate, capacity or budget limitations.</td> <td>Partially met 1</td> </tr> <tr> <td></td> <td></td> <td>There is no formal mandate, no clear responsibilities and most major Readiness tasks are not being carried out.</td> <td>Not met 0</td> </tr> <tr> <td></td> <td>Etc.</td> <td></td> <td></td> </tr> <tr> <td>Total 1a)</td> <td colspan="3">Met if 5 out of 6 sub-elements are met or Scoring 10-12 = met 5-9 = partially met 0-5 = not met)</td> </tr> <tr> <td>1b) Consultation ...</td> <td></td> <td></td> <td></td> </tr> <tr> <td>2a) Land Use</td> <td></td> <td></td> <td></td> </tr> <tr> <td>2b) Strategy Options</td> <td></td> <td></td> <td></td> </tr> <tr> <td>2c) Implementation Framework</td> <td></td> <td></td> <td></td> </tr> <tr> <td>2d) SESA</td> <td></td> <td></td> <td></td> </tr> <tr> <td>3) Reference</td> <td></td> <td></td> <td></td> </tr> </tbody> </table>			9 Standards	6 Sub-elements/Standard (Total 54 Sub-elements)	Detailed qualitative description (based on R-PP Template)	Achievement Scoring	1a) National REDD management arrangements	Stakeholder engagement in national REDD+ institutions and management arrangements	All key stakeholders are substantially and consistently engaged. (Define substantially + consistently, e.g. information is consistently and transparently shared)	Met 2			Stakeholder engagement is happening, but is not consistent and substantial (information is not always timely, accessible, comprehensible), or not all key stakeholder groups are engaged.	Partially met 1			No stakeholder engagement.	Not met 0		Effective management of Readiness	Institutions have a formal mandate and a sufficient budget for Readiness management. They carry out all major responsibilities (define).	Met 2			Institutions carry out some of the major Readiness responsibilities but not all, due to a lack of formal mandate, capacity or budget limitations.	Partially met 1			There is no formal mandate, no clear responsibilities and most major Readiness tasks are not being carried out.	Not met 0		Etc.			Total 1a)	Met if 5 out of 6 sub-elements are met or Scoring 10-12 = met 5-9 = partially met 0-5 = not met)			1b) Consultation ...				2a) Land Use				2b) Strategy Options				2c) Implementation Framework				2d) SESA				3) Reference			
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	Total R-Package	Scoring 99-108 = endorsed as significantly progressed, eligible to Carbon Fund (and other purposes tbd) 45-99 = making significant progress, but requiring further development 0-45 = not making significant progress																																						
WWF	We agree with public comments of the USG that alternative language like “goal” or “vision” would be preferable to “standard.”																																							
WRI	There should be an additional guidance document aimed at helping REDD+ countries and TAP/PC members assess progress relative to each standard. Relevant guidance may include: <ul style="list-style-type: none"> o Guidance on how to interpret the standard (and each element within the standard) in the national context. o Guidance on sources of information to review and cite (e.g. specific types of outputs, documents, results, etc) 																																							
WRI	The concept note should present the standards disaggregated by element, in order to encourage separate consideration of each element and to provide a clear structure for the presentation and review of information within the R-Package. The two proposed reference points (currently presented as the ‘standard’ and ‘partially met standard’) should directly link to the ‘two general stages of readiness’ described in the concept note (this will create a link between the assessment and the overall outcome). In line with our recommendation to de-link the standards from the Carbon Fund, one could potentially consider a fourth column indicating the minimum standard of readiness for the Carbon Fund. <p>Table 1: Disaggregation of Standard 1a: National REDD+ Institutions and Readiness Management Arrangements</p> <table border="1"> <thead> <tr> <th rowspan="2">Elements comprising the Minimum Standard</th> <th>Reference point 1:</th> <th colspan="2">Reference point 2:</th> </tr> <tr> <th>‘Significant Progress</th> <th colspan="2">‘Progress’</th> </tr> </thead> <tbody> <tr> <td><i>Engagement of all key stakeholders</i></td> <td>Stakeholders are substantially</td> <td>Stakeholders are engaged</td> <td></td> </tr> <tr> <td><i>Information sharing</i></td> <td>Information is consistently</td> <td>Information is shared</td> <td><i>e.g. N/A</i></td> </tr> <tr> <td><i>Mandate & budget</i></td> <td>Formal mandate with sufficient budget</td> <td>Seeking a mandate to</td> <td><i>e.g. progress required</i></td> </tr> <tr> <td><i>Management of technical preparation relevant to</i></td> <td>Technical preparations are effectively supervised</td> <td>Institutions are capable of supervising</td> <td><i>e.g. significant progress</i></td> </tr> <tr> <td><i>Influencing the design & implementation of</i></td> <td>Institutions are demonstrating capacity</td> <td>Institutions are developing capacity</td> <td></td> </tr> <tr> <td><i>Managing REDD+ funds</i></td> <td>Institutions have the capacity</td> <td>Institutions are establishing the</td> <td></td> </tr> <tr> <td></td> <td></td> <td>to manage REDD+</td> <td></td> </tr> </tbody> </table>					Elements comprising the Minimum Standard	Reference point 1:	Reference point 2:		‘Significant Progress	‘Progress’		<i>Engagement of all key stakeholders</i>	Stakeholders are substantially	Stakeholders are engaged		<i>Information sharing</i>	Information is consistently	Information is shared	<i>e.g. N/A</i>	<i>Mandate & budget</i>	Formal mandate with sufficient budget	Seeking a mandate to	<i>e.g. progress required</i>	<i>Management of technical preparation relevant to</i>	Technical preparations are effectively supervised	Institutions are capable of supervising	<i>e.g. significant progress</i>	<i>Influencing the design & implementation of</i>	Institutions are demonstrating capacity	Institutions are developing capacity		<i>Managing REDD+ funds</i>	Institutions have the capacity	Institutions are establishing the				to manage REDD+	
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RFN+BIC	Regarding purpose and scope of the R-Package: there is a lack of clarity with regards to the purpose of the document, how it may be used to properly determine a country's level of readiness and what it takes to gain access to the FCPF Carbon Fund. In order to fulfill those purposes, we believe that the standards set out in the Concept Note need to be further detailed and refined, including by setting clear assessment criteria.				
RFN+BIC	In simultaneously striving to avoid setting a 'minimum standards' and deal with the difficulty in determining an "optimal level of Readiness", the concept ends up being unclear on whether, or to which degree, a country needs to meet the standards to qualify as "REDD ready" and to be considered 'significantly advanced' towards readiness. Additional guidance is still needed on what criteria need to be met for a country to qualify as 'significantly advanced'.				
RFN+BIC	There is lack of clarity on whether, or to what extent, the preparation of the R-package is supposed to be a feedback exercise or a review against standards. It might be that the answer depends on whether we're talking about PC endorsement with the purpose of accessing the Carbon Fund or other funding for various stages of REDD. The role of the R-package in allowing countries to access financing from the FCPF CF ("PC endorsement") needs to be clarified and decided by the PC and the CF contributors.				
RFN+BIC	Regarding the <u>assessment approach</u> , we believe there's a need for further clarification with regards to operationalization. More precise indicators are needed to guide the country- led processes and the PC to make informed assessments of progress. Undefined language such as "significantly advanced"/"significantly progressed" should, if possible, be avoided. We are also surprised by lack of references to, and consistency with, the Cancun safeguards. The balance between a national assessment process and an international assessment process needs to be clarified.				
RFN+BIC	It requires that the standards be broken down into a set of customized indicators (along generally accepted lines) that make sense for each country, and get integrated into their national M&E, MRV and Safeguard Information Systems. The FMT should develop a template or guidance for countries deciding to go through this self- assessment process and the PC should allocate additional funding to carry it out, where this is needed.				
WWF	We think it is essential that scaled-up funding for the full implementation phase of REDD be linked to high standards of readiness. However, if the standards described are used as prerequisites to accessing finance from the Carbon Fund, we feel the benchmarks described for some of the components are unrealistic in the near-term for most or all countries striving toward REDD readiness. We suggest slight adjustments to some of these benchmarks below to, in our opinion, better reflect the highest bars that countries are likely to be able to meet in the near-term.				
CIEL	It is not clear how "readiness" will be defined, how "readiness" will be assessed, and who will determine that a country is "ready" – each of these issues should be explicitly addressed in the revised version of the Concept Note. For example, the standards are described as benchmarks to assess the readiness activities rather than 'hard targets' or 'minimum standards', which seems to imply that a country does not necessarily need to meet this standard to qualify as REDD "ready". Rather, the Concept Note indicates that the standards will be used to determine a country's progress and whether it can be considered 'significantly advanced' towards readiness. ⁴ However, it is not clear what degree of progress towards achieving each standard is required. Without additional guidance or assessment criteria as to what qualifies as 'significantly				

⁴ FMT Note 2011-14, at 9.

	advanced', an assessment based on these standards would likely result in an arbitrary determination as to whether a country has made sufficient progress towards readiness.
CIEL	In its description of the assessment approach, the Concept Note does not address what is required or what standards must be met for the Participants Committee to endorse a country's R-Package. As mentioned above, it is unclear how a country could receive a positive assessment of "readiness" if it has only 'partially met' one or more standards and thus needs additional time/resources to implement readiness activities. The 'partially met', lower-level standards should be eliminated to avoid suggesting that non-compliance is somehow an acceptable "standard". Further, the note should clearly articulate the need for a cumulative assessment of all of the standards/elements to assess "readiness."
EIA	The concept of the "partially met" standard is confusing, adds nothing substantive to the Concept Note and should be deleted. The "partially met" standards are general, vague statements with no clear criteria that merely assume that all aspects of each component are only partially met. It is more likely that R-packages will be received by the FCPF that document that some elements of the "standard" are met, some other elements are in process and have made sufficient progress to at least meet the "partially met" standard, and some elements of certain components do not even meet the "partially met" standard. Without clear guidance and criteria the "partially met" standard adds nothing substantive and does not provide guidance concerning what will happen if the "standard" is not met. It may be perceived by some REDD countries that the "partially met" standard is an alternative "minimum standard" which will lead to having their R-Package approved by the FCPF in some way. Unless the purpose of the 'partially met' standard is articulated and reformulated so it is helpful to REDD countries preparing their R-Packages and to the TAP and PC as they review the R-Packages, it should be deleted in its entirety from the Concept Note.
EIA	There is a need for the Concept Note to provide more precise indicators so that REDD Countries can make informed assessment of progress and whether they are implementing sufficient readiness activities. Terms like "significantly advanced" and "significantly progressed" are unclear. Are these criteria assessed against a benchmark or are they judged from where the REDD country started at the beginning of the FCPF process. If it is the latter, more developed REDD countries would have to do sufficiently more to meet the "Standard" than countries that are building their REDD forestry and governance infrastructure from scratch. The sub-components need to be further developed and criteria inserted that are clear and precise so that REDD countries can move their readiness process forward and submit their R-Package when they have actually made the progress expected by the FCPF.
EIA	The nine standards employed by the FMT in the concept note is a reasonable number, unfortunately, the language of many of the standards is not sufficiently clear or detailed to provide the guidance necessary for REDD countries, the TAPs and the PC to evaluate how much progress needs to be made to meet a standards and exactly what that progress needs to be. The Standards need to be retooled with the idea that they are establishing sufficiently clear qualitative benchmarks to REDD countries so they know what is expected in their readiness preparation and therefore, in the R-Package. Such benchmarks will allow the TAPs and PC to be able to assess whether a REDD country is meeting the standards or has further readiness work to perform.
WRI	We recommend replacing the term 'standard' with 'benchmark', in line with our overarching recommendation to de-link R-Package design from considerations of Carbon Fund eligibility. The benchmarks could be used to identify a specific 'minimum standard' of readiness to participate in the Carbon Fund (or similar performance-based initiatives), but this should be kept separate.

	<p>Currently, the standards are explicitly linked to “a level of preparedness...that would allow a REDD+ country to implement performance-based schemes on a pilot basis” (e.g. the Carbon Fund). As such, they are implicitly serving as a minimum standard, despite statements that the “set of standards...in the present note is <i>not</i> to define a minimum standard.” Following our recommendation above would eliminate this contradiction.</p>
USA	<p><i>On page 9: The approach chosen to define a set of standards for the R-Package in the present Note is not to define a ‘minimum’ standard</i></p> <p>Rather than explaining what the standard is not, it may be easier to say what the standard is. We suggest this language: "while not a minimum standard, or optimal blueprint, the components in the R-Package represent a set of standards that must be met to reach a benchmark in the process towards REDD readiness."</p>
WRI	<p>Page 9, paragraph 3</p> <p>We recommend revising this paragraph consistent with the overarching suggestion above. We suggest that all references to the Carbon Fund should be discussed in a separate text box. “Each benchmark proposed below consists of 5-6 distinct elements. For each element, we have proposed two reference points corresponding to the ‘two general stages of readiness’ described above (i.e. ‘significant progress’ and ‘progress’).”</p>
EIA	<p>P 9, 4th Para. This paragraph describes the reason for the inclusion of the “partially met” standard: “The subsequent paragraph labeled ‘partially met’ represents a lower-level standard and describes a stage at which the country hasn’t met the standard, and requires feedback on the next steps and more time to implement them.” and “The lower standard, on the other hand, is intended to provide countries a point of reference as they continue to advance readiness preparations.”</p> <p>REDD countries should be able to look at the actual “benchmark” and know whether they have met this standard or not. The process established for R-Package review provides for a TAP review which will provide a country-specific analysis of whether the country has met the “standard” and if not why, which will be much more useful to the REDD country as it continues to advance readiness preparations than the generic uninformative “partially met” standards. More importantly, the Concept Note currently does not describe the process or available funding for “feedback on the next steps and more time to implement them” or how the REDD country is going to “continue to advance readiness preparations.” The Concept Note need to be expanded to describe the method envisioned for continuing the readiness process that the FCPF has dedicated years to understanding, describing and fostering, but seems to now be leaving at the curbside or leaving REDD countries to fend for themselves.</p>
EIA	<p>P 9-10, “General Characteristics of the R-Package.</p> <p>The text starting on page 9 and carrying over to page 10 describes 5 aspects of “Readiness preparation” that carry over to all sub-components. Although a participatory approach is discussed, capacity building promoted, action plans are budgeted, REDD+ actions are monitored, and consistency with emerging UNFCCC guidance is mandated, the budgeting and monitoring is focused on REDD+ actions, there is no requirement for ongoing improvement, budgeting or monitoring of readiness preparation activities, including monitoring of those aspects of readiness that all participants agree are going to extend beyond the implementation period of the Readiness Grant. Additionally, the participatory approach should mirror the Cancun Safeguard requirement of “full and effective participation.”</p>
USA	<p>On page 10; 1a:</p>

	Suggest that for each Component (or sub-component) listed, the relevant Cancun element be listed. This will help with clarity of concept.
Germany	<p><i>On pp 10; 1a.</i></p> <p>Please clarify the relation between 1a. and 2c., there seems to be either considerable overlap between the two or a clear differentiation of responsibilities and the levels of decision-making/regulation and technical implementation need to be further explained.</p> <p>The "Rationale" paragraph in many cases contains more qualitative information than the standard itself. It is not clear why rationale and standard need to be separated, but at least the "Rationale" should be a permanent part of the R-Package Review Template in order to provide guidance during assessment.</p>
Germany	<p><i>On pp 11; 1a standard</i></p> <p>Please specify "technical preparations" in order to make clear links to other R-Package components like REDD+ strategy implementing agencies, land tenure agencies, financing mechanism, REDD+ registry, monitoring system etc.</p> <p>"transparently manage" - it should become clear to what kind of institutional oversight the REDD+ management is accountable and what kind of measures are being adopted to address potential risks of corruption.</p>
WWF	<p>Component 1a: Replace “based on a formal mandate and with sufficient budget” with “ based on a formal, budgeted mandate.” A “sufficient budget” is virtually unattainable, and the REDD+ finance gaps already identified by many countries will not be resolved any time soon. However, the other elements of the goal, if achieved, would implicitly reflect adequate support in the national budget.</p>

Standard 1a: National REDD Management Arrangements

WRI	<p>National REDD+ institutions and management arrangements are substantially and consistently engaging key stakeholders, and consistently and transparently sharing information; are leading the national readiness process, based on a formal mandate and with sufficient budget; and are demonstrating capacity to influence the design and implementation of national policies relevant to REDD+, including <u>effectively coordinating actions</u> across sectors and different levels of government. Institutions and arrangements are effectively supervising technical preparations relevant to REDD+; and have the capacity to receive and manage REDD+ funds from various sources <u>in a transparent and accountable manner</u>. A mechanism for feedback and grievance redress is functioning, and its relationship to the national REDD+ management arrangements is clear.</p>
Global Witness	<p>Standard 1(a). It is essential that REDD+ institutions and management arrangements have the capacity to enforce the implementation of national policies. We recommend adding at the end of the first sentence, “<i>and ensure their enforcement.</i>” The institutions and arrangements receiving and managing funds from various sources must do so in a “<i>transparent and accountable manner.</i>” It is also important that mechanisms for feedback and grievance redress are functioning and “<i>effective.</i>”</p>
EIA	<p>P 11, Standard. <i>Before the last sentence a sentence needs to be added that the country “; and have the capacity to enforce and control REDD+ activities.”</i></p> <p>While the FCPF will need to develop criteria and indicators for all aspects of governance, appropriate law enforcement is a critical and much-overlooked element. “Readiness” from an enforcement perspective should include ensuring that adequate measures have been</p>

	undertaken to establish and maintain the rule of law, preventing prevent illegal logging and other forest illegalities, and implementing effective transparency and anti-corruption measures, through an approach that engages relevant stakeholders particularly indigenous peoples and forest dependent communities in enforcement efforts, while ensuring respect for their rights. The R-Package will need to analyze the REDD+ country's existing forest management systems and thoroughly evaluate whether effective mechanisms are in place to prevent forest illegalities and corruption.
EIA	<p>P 11, Footnote 12. The definition of "Key Stakeholders" needs to be expanded to include law enforcement personnel and the oversight community. Relevant authorities from law enforcement and oversight community must be included in the development of REDD+ readiness plans and implementation. This should include federal, regional and local governmental entities involved in preventing forest crime and corruption. Names may vary from country to country, but these stakeholders may include units from the Department/Ministry of Justice and particularly any environmental unit or money laundering unit; any Comptroller charged with oversight of governmental spending; Customs; the prosecutor's office; the military; police, and any ombudsman charged with protecting citizen's rights.</p> <p>This comment applies to all sub-components that refer to "key stakeholders."</p>
Germany	<p><i>On pp 11; foot note 13:</i></p> <p>A reference to the RPP Review Standard 1b) (Information Sharing and Early Dialogue) is missing but contains necessary elements like "evidence that a reasonably broad range of key stakeholders has been identified, voices of vulnerable groups are being heard, and that a reasonable amount of time and effort has been invested to raise general awareness of the basic concepts and process of REDD-plus including the SESA.</p>
CIEL	<ul style="list-style-type: none"> • <i>1a National REDD management arrangements (p. 11, Standard 1a)</i> <p>It is essential that monitoring and reporting systems and grievance mechanisms are not only functioning but also effective in providing information and recourse to affected individuals and communities. As such, this standard should be revised as follows: "An effective mechanism for feedback and grievance redress is functioning, and its relationship to the national REDD+ management arrangements is clear."</p> <p>In the R-Package, this standard would require countries to report on whether and how the mechanism had been used and if had effectively addressed inquires, complaints and/or grievances that arose during the implementation of readiness activities.</p>
RFN+BIC	Several opportunities are missed to refer to Cancun safeguards language on "The full and effective participation of relevant stakeholders, in particular, indigenous peoples and members of local communities...", such as under component 1, standards 1a and 1b.
USA	<p><i>On pp 12 standard of 1b:</i></p> <p>Full consensus is hard to achieve on any topic. Would a definition be useful here?</p>

Standard 1b: Consultation, Participation and Outreach

Germany	<p>On pp 12 standard of 1b:</p> <ol style="list-style-type: none"> 1. What is the difference between well-advanced and relatively advanced? What are objective criteria for external assessment? 2. what would be appropriate evidence for consensus? 3. What would be indicators for external assessment whether outcomes of consultations have been "fully taken into account" or only "taken into account"?
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	4. What is the difference between "an integral part" and "a part" of all nine R-Package components?
WWF	Component 1b: After "transparent;" insert "reflect a high level of involvement;".
CIEL	<ul style="list-style-type: none"> • 1b Consultation, Participation, and Outreach (p. 12, Standard 1b) <p>The rationale for this standard should explicitly state that countries should consider all rights holders when conducting consultations and other means of participation. From a textual perspective, this language describing the need to consider gender considerations in participatory decision-making processes should also apply to the other clauses in the sentence.</p> <p>The requirement that consultations are well-advanced and efficient is extremely vague, and should likely be qualified or revised to reflect other considerations. For example, it is more important that consultations provide meaningful and effective opportunities for participation, are well-documented, and take public input into account rather than that they are conducted in an efficient manner. In addition, indigenous peoples' rights – including the right to free, prior, and informed consent – extend beyond recognition of their traditional decision-making processes and therefore should be explicitly referenced here.</p> <p>For these reasons, this standard should be revised as follows: "Consultations with key stakeholders at the national and local levels are <i>well-advanced</i>, efficient and transparent; facilitate timely access to information in a culturally appropriate form (including language); and achieve consent, respecting the rights of Indigenous Peoples and forest-dependent communities; taking into account gender considerations."</p>
Global Witness	Standard 1(b). Consultation and participation must respect the rights of indigenous peoples that are recognized by international law, consistent with the Cancun safeguards. The standard should be revised to state, "...respecting Indigenous People's <u>rights and traditional decision-making processes and...</u> "

Standard 2a. Assessment of Land use, Land Use Change Drivers, Forest Law, Policy and Governance

Germany	2a title: "Land Use and Forest Law"
Germany	<p>Pp 13 2a standard:</p> <ol style="list-style-type: none"> 1. This formulation only repeats the formulation in the RPP Review Template" A complete assessment is presented" instead it should read "present results of studies proposed in preliminary assessments". 2. qualitative and quantitative analysis 3. (since analysis in RPPs remained mostly qualitative) 4. reference to "shortcomings in current legal framework and issues that led to the underperformance of previous programs" is missing. 5. and policy coherence issues; first steps taken to remove the most relevant policy incoherencies should be documented, or if deemed to be unfeasible, explicitly discarded as a REDD+ strategy option.
USA	<p>Pp 13 2a standard: Or with other financing And enforcement? <i>On partial standard</i> Or with other financing</p>
WWF	Component 2a: Replace "complete analysis" with "comprehensive analysis".

WRI	<p>Standard 2a: Assessment of Land Use, Land Use Change Drivers, Forest Law, Policy and Governance</p> <p>A <i>comprehensive</i> assessment building on work conducted during the R-PP formulation phase for this component is presented. A <i>complete</i> analysis of recent <u>describes</u> historical land use trends, <u>thoroughly considers competing development and land use strategies</u> and assesses ment of relevant land tenure, natural resource rights and governance issues is used to <i>prioritize</i> key direct and indirect drivers to be addressed by the programs and policies included in the REDD+ strategy, and <i>establishes systematic</i> links between key drivers and REDD+ activities. Action plans to make significant progress in the short-term towards addressing relevant land tenure, natural resource rights and governance issues in priority regions related to specific REDD+ programs, <i>outline steps and identify required resources</i>. The assessment identifies implications for forest law and policy in the long-term.</p>
EIA	<p>2a. P 13, Standard. “Prioritize key direct and indirect drivers”</p> <p>The Concept Note gives no direction or criteria for how a REDD country should “prioritize” the drivers of deforestation. In many of the R-PPs that the FCPF has approved, many if not all of the drivers that generate commercial and state revenues or involve illegalities have been ignored and the focus has been on small scale harvesting and farming where numerous studies have documented that commercial enterprises are the major drivers of deforestation and degradation.</p> <p>The complex interplay of ALL of these drivers must be understood and addressed in the R-Package if REDD+ activities are going to be implemented successfully over time. A description of the readiness activities undertaken to mitigate these drivers will be a key component of the R-Package. Moreover, the scope and budget committed to these mitigation activities must be clearly articulated. “Drivers” that should be considered in any realistic assessment include energy production and associated displacement (<i>e.g.</i>, hydro-electric dams and soybean production for biofuels), extractive resource activities (<i>e.g.</i>, mining); commercial agriculture (<i>e.g.</i>, beef, soybeans, and palm oil); infrastructure development (<i>e.g.</i>, dams and roads); expansion of urban areas; financial flows including investments, investment incentive structures, and national debt; and forest dependency, including small scale farming, fuel wood, unclear land tenure, and poverty. These direct and proximate drivers are, in turn, influenced by forest policies, management, and legal frameworks; national politics and economy; and global, regional and national commodity and energy demand. In many REDD+ countries, major drivers of deforestation and forest degradation are non-compliance with forest-related laws and poor governance of forest resources including weak law enforcement. Many of the drivers of deforestation and degradation actually originate from outside the forest sector and frequently outside the country, particularly where the alternative land use is more profitable than forest conservation. Additionally, international drivers and leakage have frequently overlooked and need to be assessed to ensure that they are not going to cause the REDD+ activity to fail.</p>
EIA	<p>P 13, Standard. “Action plans to make significant progress in the short-term towards addressing relevant land tenure, natural resource rights ... outline steps and resources.”</p> <p>A review of the expenditure of REDD funds provided to date demonstrates that only a small fraction is being expended to resolve the critical issues of land tenure and natural resource rights of indigenous people and other forest dependant peoples, with the majority of REDD funding being spent on MRV and REL/RL issues. This is why adding having adequate funding for readiness activities as a cross component issue is essential.</p>
	<p>P 13, Standard. “Action plans to make significant progress in the short-term towards</p>

	<p>addressing relevant ... governance issues ... outline steps and resources.”</p> <p>Poor forest governance, inadequate law enforcement, and corruption have been internationally recognized as major impediments to the successful implementation of REDD+. Good forest governance requires: 1) transparency, accountability and public participation; 2) stability of forest institutions and conflict management; 3) quality of forest management; 4) coherence of forest legislation and rule of law; and 5) economic efficiency, equity and incentives.⁵ The FCPF has fleshed out these concepts in the R-PP Template, which highlights how REDD+ countries can demonstrate good governance and coordination across and within governmental departments. The R-Package must contain information demonstrating that the REDD+ country has conducted an honest assessment of its forest governance and has implemented processes to address weaknesses identified during the Readiness Phase. “Readiness” from an enforcement perspective should include ensuring that adequate measures have been undertaken to establish and maintain the rule of law, preventing prevent illegal logging and other forest illegalities, and implementing effective transparency and anti-corruption measures, through an approach that engages relevant stakeholders particularly indigenous peoples and forest dependent communities in enforcement efforts, while ensuring respect for their rights. The R-Package will need to analyze the REDD+ country’s existing forest management systems and thoroughly evaluate whether effective mechanisms are in place to prevent forest illegalities and corruption.</p> <p>Country-specific criteria/indicators will be necessary to identify weaknesses in REDD+ governance and forest governance, detect forest crime, track efforts to strengthen and improve governance and enforcement, and react appropriately to the ever changing vectors that drive forest crime.</p>
CIEL	<p>2a Assessment of Land Use, Land Use Change Drivers, Forest Law, Policy and Governance (p.13, Standard 2a) :</p> <p>The rationale should describe more specifically what is required for the assessment of relevant land tenure, natural resource rights and governance issues. In particular, the assessment should describe the process of identifying actual or potential tenure conflicts as well as the available means to resolve those conflicts. It should also identify specific areas involving disputed property rights (including customary rights).</p>
RFN+BIC	<p>Component 2, standard 2a (including land tenure) mentions only “assessment of [...] relevant land tenure...”. We believe that the important reference to “according to national and international legal obligations” should be added.</p>
RFN+BIC	<p>Standard 2a: “...priority regions” remains unclear. How and by whom are the priorities set?</p>

Standard 2b: REDD+ Strategy Options

Germany	<p>2b standard:</p> <ol style="list-style-type: none"> 1. tested (not many non-native speakers understand "vetted") 2. reference to "clear rationale for engaging in any or all of the five REDD+ activities" is missing 3. evidence should be provided that these strategy options have been subject to consultations and stakeholder input has been integrated.
WWF	<p>Component 2b: Remove “Options are fully integrated with relevant development policies and strategies and include budgeted action plans for implementation.”</p>
Global Witness	<p>Standard 2(b). It should explicitly state that the assessment of strategic options described will take into account consistency of strategic options with the REDD+ safeguards of the Cancun</p>

⁵ World Bank, The Building Blocks of Forest Governance and Their Principal Components.

	Agreement.
RFN+BIC	Standard 2b: needs greater mainstreaming with regards to the Cancun safeguards. An explicit reference to “in accordance with the Cancun safeguards” should be added.
EIA	<p>P 13-14, 2b. REDD+ Strategy Options, Rationale and Standard.</p> <p>The strategy needs to address all of the direct, indirect and international drivers of deforestation and forest degradation identified in the assessment and evaluate them in the context of sustainable development. Once again, a premature prioritization, without guidance or criteria will thwart REDD+ activities over the long term.</p> <p>The “comprehensive assessment” called for in the Standard without more guidance will be difficult if not impossible for REDD countries to conduct and may undermine REDD+ activities. The standard calls for “<i>comprehensive</i> assessment of their feasibility from a socio-economic, political and institutional perspective, costs and benefits in relation to people’s livelihoods and biodiversity, and major risks associated with the specific REDD+ Strategy options (e.g., leakage, environmental and social risks identified through the SESA) and ways to manage and mitigate them.” This broadly defined assessment will allow countries to justify any development path. Inclusion of political and cost-benefit evaluations will likely lead to an increased cost for REDD+ activities and will likely favor commercial development, particularly where the method for valuing non-commercial attributes such as biodiversity and people’s livelihoods is not described. This type of assessment will provide cover for the continued focus on small scale deforestation and degradation and allowing tax and job generating commercial enterprises to flourish and undermine REDD+ activities.</p> <p>Additionally, the first line of assessment should be to eliminate social and environmental risks, and only if these risks cannot be eliminated should the assessment evaluate mitigation of risk.</p>

Standard 2c: Implementation Framework

Germany	2c Implementation framework as mentioned before, clarify relation/difference between 1a. and 2c.
Germany	<p>2c standard</p> <ol style="list-style-type: none"> 1. and has been subject to previous consultation with relevant stakeholders 2. Although listed in the rationale, reference is missing to the agencies implementing identified REDD+ strategy options (e.g. national park authority, land tenure authority, agricultural extension services), their estimated implementation/enforcement capacities, associated resource needs and lessons learnt from the implementation of relevant programs in the past. 3. which system? the legislation/regulation mentioned in the sentence before? 4. reference to "conflict resolution" is missing 5. and provides acceptable rules to address risks of leakage and non-permanence 6. ownership of land, carbon or both?
USA	2c standard (on the term adopted): At times the problem is not just adoption of laws (which is difficult enough), but also the implementation. Should this be referenced here?
Global Witness	Standard 2(c). the implementation framework must also be consistent with the country’s international obligations. The standard should be revised to state, “ <i>The system is transparent, equitable, and consistent with international obligations.</i> ”
CIEL	<ul style="list-style-type: none"> • 2c Implementation Framework (p.14-15, Standard 2c)

	When describing the implementation framework, each country must explain how it has addressed international obligations in the relevant national systems (i.e. institutional, economic, legal and governance arrangements necessary to implement REDD+ strategy options. This should be reflected in the rationale and in the second sentence of the standard, which should be revised as follows: “National legislation, regulations and/or systems are transparent, equitable and consistent with international obligations.”
EIA	<p>P 14, 2c. Implementation Framework.</p> <p>The legislation and/or regulations need not only be adopted but implemented with appropriate involvement of enforcement and oversight personnel including the judiciary to ensure that they will be enforced. Additionally, the R-Package needs to document that the REDD country has an operational and effective accountability and grievance mechanism that is independent, transparent, effective, accessible to affected people. As the laws and /or regulations being mandated by this subcomponent deal directly with the participation in REDD+ activities and the financial benefits that flow there from, special attention and direction is needed to ensure that indigenous people and other forest dependant peoples are not disenfranchised and that the proceeds from REDD+ financing are distributed taking into account land and forest resource rights, as well as in a manner that incentivizes local forest dependent communities to participate in forest protection and the sustainable management of forests.</p> <p>While a number of REDD+ countries may have excellent forestry and governance laws on the books, implementation and enforcement are frequently minimal to non-existent. Effective forest governance requires laws with adequate civil and criminal penalties addressing illegal logging, other relevant forest crimes, and corruption; a functional judicial system; actual prosecution of forest crimes and other forms of corruption; and the imposition of adequate penalties in these cases. The R-Package must not only describe that Legislation and/or regulations related to REDD+ programs and projects have been adopted that define, <i>inter alia</i>, the process for participation in the programs, carbon rights, distribution of benefits, modalities and procedures for official approvals, it must also document that an effective enforcement framework has been created, that the enforcement mechanisms have been operationalized, and provide documentation that adequate resources have been committed to ensure actual enforcement on the ground.</p>
WRI	<p>Standard 2c: REDD+ Implementation Framework</p> <p>Legislation and/or regulations related to REDD+ programs and projects have been adopted, which define, e.g., the process for participation in programs, carbon rights, distribution of benefits, financing modalities, and procedures for official approvals. The system is transparent and equitable. A national geo-referenced tracking system or registry is operation and manages information on the location, ownership, carbon accounting, and financial flows for sub-national and national REDD+ programs and projects. Gaps still remaining in the framework, including legal and/or regulatory changes, have been clearly identified and the associated resource needs estimated. Preliminary rules for participation in REDD+ programs and projects have been developed through a participatory process, including transparent, efficient and equitable criteria for benefit distribution. Action plans to address gaps in the legal and institutional framework required for REDD+, such as clarification of carbon rights or land tenure, have dedicated budgets and are being implemented. A transparent and accessible system to manage and coordinate information about REDD+ activities and financial flows is in place, and institutions to ensure independent oversight of activities and financial management are functioning.</p>

Standard 2d: Social and Environmental Impacts

Ethiopia	- Specific comments: Component 2d and safeguards need more integration with other component (as in R-PP)
USA	<i>On 2d rationale (social and environmental impacts): There also may be national legislative</i>

	<p><i>requirements related to safeguards</i></p> <p>Or safeguards related to financing from other sources for readiness work.</p>
Germany	<p>On 2d rationale (social and environmental impacts):</p> <ol style="list-style-type: none"> 1. all Delivery Partners, not only WB 2. The first paragraph does not provide a rationale for this section but rather explains the applicability of WB safeguards to FCPF grants and should thus be transferred into a footnote. <p>include: ", the Environmental and Social Management Framework (ESMF), the monitoring system on multiple benefits, governance and safeguards,"</p>
Germany	<p>On 2d standard:</p> <ol style="list-style-type: none"> 1. What does this mean? Shouldn't it read, "The SESA has been carried out and a summary of the process and its main findings is presented"? 2. Relevant indicators have been identified for their integration into the monitoring system on multiple benefits, governance and safeguards (R-Package component 4b.). 3. and its relation to national legislative or regulatory requirements has been clarified 4. Maybe the relation between the ESMF and the Safeguards Information System has to be further clarified.
USA	<p><i>On 2d standard: on safeguard issues</i></p> <p>Including the Cancun safeguards</p>
CIEL	<ul style="list-style-type: none"> • <i>2d Social and Environmental Impacts (p.15, Standard 2d)</i> <p>The SESA alone does not provide an adequate assessments of compliance with the Cancun safeguards. The SESA template developed by the World Bank for the FCPF provides an alternative means to assess social and environmental risks and impacts. While the tool does include some useful features, neither the SESA nor the ESMF serve as a reliable assessment of safeguards compliance. For example, these processes do not: help to ensure respect for international obligations will be respected; prevent conversion of forests to plantations; or require transparent and effective governance structures at the national and local levels. In addition, the Concept Note fails to consider rights in the context of international obligations, which is a key component of the Cancun safeguards.</p> <p>This point should also be reflected in the general discussion of safeguards compliance on p. 7 of the Concept Note.</p>
EIA	<p><i>P15, 2c. Social and Environmental Impacts.</i></p> <p>The Standard fails to incorporate the Cancun Safeguards which are clearly applicable to this subcomponent. Likewise, while the compliance with the Common Approach is mentioned, there is no mention of the requirement that country level accountability, dispute resolution and redress mechanisms that are independent, transparent, effective, accessible to affected people and operational need to be documented in the R-Package.</p> <p>Additionally, there is no discussion of how social and environmental safeguards and the requirements of the country-specific SESA is going to be incorporated in to the country's national REDD+ strategy. The various components of a REDD country's REDD program need to be integrated, complimentary and coordinated. The Concept Note needs to provide REDD countries with criteria and a framework of how this should be accomplished.</p>

	Again, the standard talks about “prioritized” drivers without any discussion in the Concept Note about the criteria that should be used for such prioritization.
EIA	<p>P 15, Footnote 18.</p> <p>For the first time in any FCPF document that we are aware of, in Footnote 18, the FMT is setting forth the principle that under extraordinary circumstances (which are not defined), the FCPF can finance the implementation of policies and projects during the preparation of the R-Package. This financing would seem to fall under the mandate of the Carbon Fund which by FCPF Charter cannot finance this type of activity until an R-Package has been submitted and approved. This footnote seems to be suggesting that the PC can use Readiness Funds for these activities or that there is a silent emergency exception in the Charter to use the Carbon Fund monies in this manner. This footnote should be removed and this concept should be presented to the PC for a full discussion, subject to public comment.</p>

Standard 3: Reference Emissions Level/ Reference Level

USA	<p><i>On component 3 rationale:</i></p> <p>May be helpful to include the other information that is requested if adjustments are made (Annex to the Durban decision) as a footnote, or reference back to it.</p> <p>Suggest this is required to be consistent with the guidance in the Durban decision and annex, and any further UNFCCC decisions.</p>
USA	<p><i>On component 3 standard:</i></p> <p>In Durban we noted the step-wise approach was optional. Suggest we do the same here. We believe that the language in this phrase is already covered in the following sentence on national circumstances and may be duplicative.</p> <p>Suggest a reference is made to the information required for adjustments in the annex to the Durban decision.</p>
Germany	<p>On component 3 standard:</p> <ol style="list-style-type: none"> 1. include reference to no-regrets approach/conservative estimates; should there be a reference to country emission reduction targets? 2. include reference to periodical update 3. based on which criteria or guidance? 4. Please further define peer review.
WWF	<p>Component 3: Remove “the main programs or policies of the REDD+ strategy.” Change “adjustments to the REL/RL are credible” to “adjustments to the historic REL/RL are credible”. Remove or clarify what is meant by “significant step towards an evolving operational system”.</p>
Vietnam	<p>5. In the Standard box of the REL/RL, the sentence “REL/RL is built to reflect the priority identified drivers of deforestation and/or forest degradation, and forest carbon conservation and enhancement” should be revised by deleting this phrase. The REL/RL could be used for identifying the emissions by sources and removals by sinks (but not the causes/driving forces). The fact is that the identification of drivers of deforestation and/or forest degradation, and forest carbon conservation and enhancement shall be done by Forest Monitoring system.</p>
EIA	<p>The Concept Note provides no guidance to REDD countries of how to develop REL/RL except to use a clearly documented methodology and a “step-wise approach on a “no regrets” basis. The REL/RL is “built to reflect the priority identified drivers of deforestation and degradation, and forest carbon conservation and enhancement.” This is another one of the many nice sounding sentences in the Concept Note that don’t mean anything to a lay reader. It apparently means that the REL/RL should make some nod to the value of forest carbon conservation (without</p>

	having any idea of the value that is going to be placed on carbon) and to conservation of forest carbon stocks (does this include peat?), sustainable management of forests and enhancement of forest carbon stocks. Without more clarity, criteria and indicators, it is difficult to expect a REDD country to know what the standard actually means or for a TAP and the PC to properly assess whether the standard has been met.
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Standard 4a/b: National Forest Monitoring System/ Information System for Multiple Benefits, Other Impacts, Governance, and Safeguards

Germany	Component 4a 1. please include reference to COP 17 decision
USA	On component 4a standard: <i>The system includes the capacity to assess displacement of emissions (leakage), and early results are presented</i> And reversals. <i>On "Transparent means of publicly sharing forest and emissions data are presented."</i> It would be good if this also included an initial design for how these changes in emissions will be reported and eventually verified. Even if UNFCCC isn't there yet, noting which agency will take the lead, etc, would be helpful.
Germany	Component 4a standard: 1. and its synergies with other purposes /natural resource monitoring systems are clarified. 2. Please add a footnote on carbon pools. 3. and includes a combination of remote sensing and field-based data collection as appropriate. 4. as well as the verification/review of its results (delete potential) 5. Leakage should not be completely left out and should be addressed at least conceptually.
	P18. National Forest Monitoring System
Vietnam	3. Title of the Component 4: Monitoring Systems for forests and safeguards may need to be changed as "monitoring safeguards" is not accepted by the REDD+ countries and is not defined and required by the COPs. 4. For the National Forest Monitoring System: I think that the guidance should be clearer, one should explain "national" means completeness (consists of all activities/data from local to national levels) or level of detail (the system will generate data and monitor forest at national level – not plot/stand level). Different meanings will lead to two different designs of the national forest monitoring systems with different methodologies and sampling approaches as well as participating stakeholders. The selection of suitable meaning shall be based on the Cancun agreement (both in REDD+ section and requirements of frequency of national communication and update report)
EIA	As with the creation of laws and regulations, a national monitoring system is only as good as its implementation, the R-Package needs to document that there has been an assessment to ensure adequate staffing and that sufficient financial resources are dedicated to the monitoring program. The current Standard requiring the creation of a fully operational system over time in a step-wise fashion risks the failure of REDD+ projects and programs. Forest illegalities and thus the failure of REDD+ projects, frequently occur because forest management and enforcement bodies lack the staff, infrastructure, equipment and money necessary to regulate forest resources effectively. Inadequate training, underpaid staff, and a lack of robust monitoring procedures and accountability structures also foster illegality in the forest sector. Improving the conditions of the government employees charged with managing forest resources can be an

	<p>effective tool in reducing corruption. Better-paid staff have less incentive to accept bribes, more incentive to properly perform their jobs and more to lose if they are caught and are disciplined or dismissed. Increasing forestry staff supervision, thereby increasing the probability of identifying staff participating in illegal activities is an important complimentary enforcement tool. Providing incentives for revealing illegal activities and a confidential way to make such disclosures can dramatically reduce forest illegalities.</p> <p>REDD+ countries need to document in their R-Packages a combination of improvement of conditions for forestry personnel with strong scrutiny and penalties for bad actors to make forest management effective. Providing training to forestry officials and staff allows a better understanding of the applicable laws and processes governing forest management and an increased understanding of how to effectively monitor and report illegal activities. The R-Package must demonstrate that the REDD+ country has implemented a program of incentives and penalties to create accountability and a professional ethos among its forest management personnel.</p> <p>Government agencies often have critical regulatory, financial technical and personnel limitations on their abilities to impose the rule of law in the forestry sector. The R-Package should analyze institutional capacity and evaluate whether forums exist for citizen participation, such as: 1) Forest Management Committees; 2) Timber Compliance Assessment Partnerships;⁶ and 3) independent community monitors.</p> <p>The R-Package needs to demonstrate adequate institutional capacity and that there are both a governmental monitoring body and an independent monitoring program in place. A monitoring body with the government can ensure REDD+ activities receive appropriate consideration in all governmental decision making and can detect and help resolve conflicts of policy at an early stage. Independent monitors can assist governments by providing an independent assessment of the efforts and achievements of the forest administration and related agencies in investigating and suppressing forest crime, and to make recommendations for improvements to the current system. They have been very effective in increasing the levels of information about local forests and illegalities occurring in the forest sector. They reveal the political interests and relationships, which undermine forest management and lead to illegalities. The availability of this information can provide the basis for both increased discipline and increased professionalism within the country's forest management and enforcement agencies, and within the timber industry.</p>
Germany	<p>Component 4b standard:</p> <ol style="list-style-type: none"> 1. in a participatory process (with input from SESA & consultations) 2. and efficient 3. publicly available 4. Please clarify what this means and what the relation between the ESMF and the Safeguards Information System is.
Global Witness	<p>Standard 4(b). This component should include a link between the monitoring system and the the provision of information on REDD+ safeguards as required by the Cancun Agreement and subsequent relevant UNFCCC decisions.</p>
CIEL	<ul style="list-style-type: none"> • 4b Information System for Multiple Benefits, Other Impacts, Governance, and Safeguards (p. 19, Standard 4b) <p>This standard does not address engagement of local stakeholders in the reporting of how safeguards are being addressed and respected during the implementation of REDD+ activities.</p>

⁶ TCAP were established by the Global Forest Watch (GFW) initiative of the World Resources Institute (WRI).

	<p>The need for participatory and independent monitoring should be explicitly referenced in the rationale. It should also be referenced in the safeguard as follows: “Country has identified <i>priority</i> non-carbon aspects of REDD+ implementation and <i>put in place</i> a transparent system for monitoring and <i>reporting consistent and periodic</i> information on these aspects, taking into account input from local and other relevant stakeholders.</p>
	<p>P18-19. Information System for Multiple Benefits, Other Impacts, Governance and Safeguards</p> <p>All of the comments for forest monitoring apply equally if not more so to the non-carbon aspects of forests as there is likely less money involved in these aspects and less financial incentives to protect these aspects of forests. Therefore, monitoring, verification and enforcement will be critical.</p> <p>The Standard in the Concept Note gives little guidance to the REDD country, the TAP or the PC what needs to be done to satisfy this standard. The non-carbon aspects will vary from country to country, however, the Concept Note could set forth procedures and criteria for assessing what aspects of forests need to be monitored and how that monitoring could and/or should take place. The Concept Note provides “key governance factors directly pertinent to REDD+ implementation” as one of the non-carbon aspects that a REDD country should consider monitoring. Only the member of the FMT who wrote that phrase has any idea what governance factors are being referred to here. Similarly, without more direction on process, criteria and indicators, this section of the R-Package is likely to be written by a professional R-Package writer with little if any implementation on the ground.</p>
Germany	<p>Pp 19 last bullet under practical considerations:</p> <ol style="list-style-type: none"> 1. provide sufficient time for public commenting before submitting to PC
EIA	<p>P19-20. Practical Considerations.</p> <p>As a final practical consideration, as described above, the Concept Note needs to fully describe the processes related to the Readiness grant completion report and the R-Package, including what happens and what funding will be available if it is determined that a country’s R-Package does not meet the standard established in the Concept Note.</p>

Submission and Review Process

Germany	<p>We would welcome further elaboration on this section. It is still not quite clear in what format the R-Package will be submitted and whether there would be any formal requirements for a national validation process.</p>
Germany	<p>If the R-Package is meant to be a single document or a limited set of documents that present a synthesis of Readiness progress in the respective country, it would make a lot of sense to share it in a process of final national validation before its submission to the PC, though not full-scale consultation. Clear requirements such as a public comment period and transparency as to how feedback has been incorporated could be defined. Thus the PC would be ensured of the support for the R-Package by a majority of national stakeholders, when making their assessment of the document itself.</p>
Germany	<p>However, if the R-Package consists of a larger amount of documents and/or other sources of information, the process would need to be different and the capacities of PC members to review the R-Package would need to be reconsidered. Country self-assessment and assessment approaches used by other programs could be alternative options. Clarity on the format of the R-</p>

	Package is needed. As mentioned by others, the costs for its elaboration need to be considered as well.
EC	<p><i>Would the Fund Participants request the FMT to establish an Ad Hoc Technical Advisory Panel (TAP) on a case-by-case basis or can some general guidance be provided on when a TAP would be required and what the scope of their review would be?</i></p> <p>The TAP should systematically work on the basis of the agreed R-Package, ensuring consistency or assessing possible deviations/update/progress between the elements of the ERPIN and framing elements of the R-Package. The review should also underline how subnational ERPs mesh with local institutions, local forest dependent communities, local economic sector, local authorities and local development priorities.</p>
WRI	<p>The concept note should clearly differentiate between two distinct stages of ‘assessment’ associated with the R-Package. We recommend characterizing the two stages as follows:</p> <ul style="list-style-type: none"> <input type="checkbox"/> <i>Country assessment</i>: REDD+ countries will assess their own progress towards readiness in order to prepare the R-Package. This assessment (summarized in the R-Package) should be subject to a national validation process with relevant stakeholders. <input type="checkbox"/> <i>PC and TAP assessment</i>: The role of the TAP and PC is to assess the comprehensiveness, accuracy, and overall quality of a country’s R-Package, including the national validation process.
WRI	<p>The concept note should clearly define the possible outcomes of PC and TAP assessment. We recommend two distinct outcomes:</p> <ul style="list-style-type: none"> <input type="checkbox"/> <i>Endorsement</i>: Signifies that the PC and TAP have reviewed the R-Package, and they agree that the country’s self assessment of progress is complete and accurate, and that the national validation process was robust. Critically, endorsement would not be linked to the <i>amount</i> of progress made by the REDD+ country, but to the <i>quality</i> of the R-Package. <input type="checkbox"/> <i>Carbon Fund eligibility</i>: Signifies that the country has met clearly defined minimum standards of readiness for participation in the Carbon Fund. This decision would be additional to endorsement.
WRI	The concept note should clarify and strengthen the role of national multi-stakeholder assessment, review, and validation during R-Package preparation.
WRI	<p>The concept note should propose the development of an R-Package template and related assessment guidance. We specifically recommend:</p> <ul style="list-style-type: none"> <input type="checkbox"/> The template should be simple, not overly prescriptive, and structured around the nine standards. The template should encourage countries to draw their own conclusions about the extent to which each standard has been met, and to support these conclusions with objective evidence and analysis.
Global Witness	Additional guidance for assessing progress towards the Readiness Objectives and evaluating whether the Carbon Fund Standard is met should be developed, either as part of the Concept Note or as a standalone document. The guidance should include indicators, definitions and specific examples to aid in the interpretation of key qualitative terms (examples from the draft Concept Note standards include “substantially and consistently”, “comprehensive”, “robust”, “equitably” etc). An R-Package template may be useful in guiding countries in the preparation of R-Packages, which should include not only a description of progress made but also an identification of gaps and plans to address them.
Germany	<p><i>On submission of review process</i> <i>(A formal assessment by the PC would not be performed on the mid---term report.)</i></p> <p>However, the Delivery Partner "reviews the country progress report and the documentation available on the readiness process and prepares its own assessment [...] discloses the progress</p>

	report and its assessment [...] and may update the safeguards and activity profiles" (Common Approach II.11) Thus, would the DP's assessment of mid-term reports also make reference to the R-Package assessment standards, while confining its assessment to the activities funded through the FCPF?
USA	<p><i>On submission of review process</i> <i>(The R-Package needs to have a positive assessment before an ERPA can be signed and a country can enter into the Carbon Fund)</i></p> <p>As we proceed with developing the language on the R-Package, we also believe it is imperative to maintain the symmetry between the Carbon Fund language and the R-Package language. We thought it would be good to flag a few places where we believe we'll need to have a conversation on maintaining this consistent language in the next CF meeting.</p> <p>1. Page 5, paragraph 4, sentence 2 Need to maintain consistent language. 2. Page 9, paragraph 4, final sentence Does the Carbon Fund language need to be adjusted? It won't just need PC endorsement of the R-Package, but a "favorable" rating against the standard. (Otherwise the PC could "endorse" the info provided as accurate, but a country may have only partially met the standard.</p> <p>Page 20, paragraph 20, sentence 1: Will be good to discuss how the "positive assessment" will affect the Carbon Fund.</p>
EIA	Finally, the meaning of the last paragraph of this section is unclear. It is our understanding that the R-Package will assess the state of readiness in a REDD country, assessing all aspects of its REDD program even if some or most of the REDD activities are not funded with FCPF funds. This needs to be clearly set forth in the Concept Note.
RFN+BIC	The role of international bodies like the TAP and PC should be to assess and validate those parts of the national self-assessment that were done well, and point out areas of gaps or that require further consideration.
RFN+BIC	Regarding the <u>submission and review process</u> , we note that the Concept Note states (for the first time) that mid-term Progress Reports won't be assessed by the TAP or the PC. Given the decision at PC10 to allow for the allocation of up to US\$5 million in additional financing to countries making "significant progress", lack of assessment of the Progress Reports will make those decisions very difficult.

R-Package and Carbon Fund

Norway	In this regard, we would like clarification on whether the current concept note is viewed to be consistent with the timeline targets set by the Carbon Fund for signing ERPAs. If it is, our concerns have been met, and we are comfortable moving ahead with drafting based on the current concept note.
Norway	As has already been pointed out by others, there is still a need to clarify the sequencing of the 'endorsement' of the R-Package and the signing of ERPAs with the carbon fund. In Berlin, we asked that this discussion be had up-front, as much of the drafting of the R-Package would follow from the conclusion to that question
Norway	Given the urgency of scaling up REDD+ implementation if we are to have a reasonable chance of closing the significant mitigation gap, it is critical that we start learning lessons sooner rather than later on how to structure payments for emission reductions within a robust and

	<p>sustainable framework. (Obviously, beyond providing lessons, this will also support mitigation opportunities now that will not be there in the future.) Norway is already doing this through our bilateral partnerships, and we have high hopes that the FCPF Carbon Fund can provide similar examples in the near term of high-integrity emission reduction programs that will be relevant in the design and implementation of the full implementation phase of REDD+. Done right, efforts to address the drivers of emissions will facilitate rather than undermine readiness efforts. We are confident that the programs under the carbon fund, complying with WB safeguards policies as well as UNFCCC requirements, will contribute to this.</p>
EC	<p>One of the requirements is that the entity submitting the ER Program is from an FCPF REDD Country Participant and authorized to submit the ER Program. How will the FMT verify this requirement if the ER-PIN is not submitted by the FCPF REDD+ focal point?</p> <p>We think the R-Package (which in our view starts a process towards requirements for the third phase of REDD+) is a national framework that should be submitted, independently reviewed and assessed by participants and observers before the ER-PIN are submitted from a Country. Furthermore, the actions proposed in the ER-PIN should be framed by the R-Package and specifically by the national REDD+ strategy. It should inter alia ensure that the entity submitting the ERP operates in a clear tenure framework where the benefits and liabilities can clearly be affected to the right holders, and that affected populations can access an effective and responsive recourse mechanism if needed. If monitoring is considered at sub-national level, it should demonstrate how it contributes and nests into the national monitoring system.</p>
EC	<p>We view the R-Package as a national framework for monitoring progress towards phase 3, not as a golden standard that would be met at the end of phase 1. We therefore anticipate that the ER Program characteristics might differ considerably from one ERP to the next, depending on the strategy it adopts for tackling REDD+ and the extent to which REDD+ results can be measured by performance that is not translated into units of carbon.</p>
USA	<p>Finally, we note that references are made throughout the document to the Carbon Fund, and the Carbon Fund's requirement that a country complete the R-Package before it might sign and ERPA. We might suggest that discussions of the use of the R-Package by the Carbon Fund be separated from the design itself. These discussions will need to happen within the Carbon Fund, and decisions such as whether a minimum standard of readiness will be required will need to be had in this forum. However, we do not feel this should affect the design of the document itself if acceptance into the Carbon Fund is not the primary purpose of the R-Package.</p>
EIA	<p>We note that references are made to the Carbon Fund throughout the Concept Note, and the Carbon Fund's requirement that a country complete the R-Package before it is qualified to sign an ERPA. We recommend that discussions of the use of the R-Package by the Carbon Fund be separated from the Concept Note's description of design, content and review process of the R-Package. The discussions of what minimum standard of readiness will be required to be documented in an R-Package before a REDD country can access the Carbon Fund should be decided by the PC in consultation with the Carbon Fund subjected to public review and comment.</p>
EIA	<p>After going on for 19 pages that there is not going to be a judgment concerning the R-Package, it is stated that an R-package needs a "positive assessment before an ERPA can be signed." There is no discussion of what standard an R-Package needs to meet to receive a positive assessment. As stated above, EIA recommends that the workings of the Carbon Fund be removed from the Concept Note and the PC in consultation with the Carbon Fund, with public review and comment, come up with a separate process for determining when an R-Package should receive a positive assessment. The R-Package process should solely be an assessment of the country's</p>

	progress on readiness.
WRI	The concept note should de-link the design of the R-Package assessment approach from considerations related to eligibility for the Carbon Fund. Instead, the approach should speak to the overarching R-Package objective of transparently assessing readiness progress. We recommend isolating all discussions about the Carbon Fund in a separate text box or sub-section of the concept note. We also recommend that the proposed 'standards' should <i>not</i> seek to characterize a level of readiness necessary to participate in the Carbon Fund. Rather, they should characterize an ambitious yet obtainable objective for readiness achievement. As a result, they should be renamed (potentially 'benchmark' or 'objective').
Global Witness	A separate "Carbon Fund Standard" should also be described in the draft Concept Note. This standard would indicate that sufficient progress has been made on key elements of readiness to justify consideration for a Carbon Fund program from the perspective of the PC. For each element of the nine standards presented in the Concept Note, a Readiness Objective should be described and a Carbon Fund Standard established. It is important that the Readiness Objectives describe the aspirational state of full REDD+ Readiness, while the Carbon Fund Standard describes the progress required for entry into the Carbon Fund. We note that, as pointed out in the draft Concept Note, endorsement of R-Package is necessary but not sufficient for the Carbon Fund to approve a given emissions reduction program. The Carbon Fund will develop its own set of criteria for assessing whether or not to accept a program into its portfolio.
RFN+BIC	As a tool to determine access to the FCPF Carbon Fund a clearer description of what "PC endorsement" entails and its relation to a "positive assessment" will be needed. The PC should also help define ways in which the R-package can be useful for reporting to the UNFCCC and accessing other funding from international sources for all stages of REDD. The PC working group as part of its work on principles for the Methodological Framework of the CF should discuss and make recommendations to the PC about what "PC endorsement" of the R-package means; and hopefully this can get decided by PC12.
WWF	Though the only requirement for completion of an RP applies to forest countries seeking Emissions Reduction Permit Agreements (ERPAs) from the Carbon Fund, we think it should be designed for broad utility as an assessment tool of national progress on REDD+ readiness.