



global witness

Comments on the UN-REDD draft report from the 4th Policy Board meeting 20 April 2010

General comments:

1. The process for incorporating comments on National Programme documents into the meeting report and the NPD Submission Forms needs to be more consistent. Some comments from the meeting are not included in the draft meeting report and some are included in the draft report but not in the signed Submission Form. The discussion of the Bolivia NPD is not accurately reflected in the comments listed in the draft meeting report, and no comments are included in the signed Submission Form (but see comment 2).
2. The use of action plans to address recommendations is inconsistent between countries. The signed Submission Form for Bolivia states that Policy Board comments will be incorporated into an action plan to be approved prior to grant signing. By contrast, Board comments for DRC and Zambia are listed in the Submission Forms and there is no mention of action plans. However, it was decided at the meeting, as stated in the draft report, that all three countries are required to produce action plans describing how they will address key issues. Specific observations for each country programme include:
 - i. *Bolivia*: The Submission Form does not list specific comments but states that “detailed comments from the Policy Board will be recorded in the Policy Board meeting report” and provides a list of Policy Board members and observers that made comments. However, in the meeting report only three comments are listed, and two of these are vague and as a result will be difficult for the country to interpret.
 - ii. *DRC*: The Submission Form states that “More detailed comments will be recorded in the PB meeting report...” but the seven comments in the draft report are identical to those in the Submission Form.
 - iii. *Zambia*: The Submission Form also states that more detailed comments will be recorded in the PB meeting report. In this case there are seven comments that are identical in the draft report and the signed Submission Form, and two comments that only appear in the draft report. We recommend that the latter comments, both made by Norway, be clearly identified as comments to be addressed before grant signing or as part of the action plan.
3. Further clarity is also required on which of the comments in the Submission Form and draft meeting report have to be addressed prior to grant signing and which are to be incorporated into action plans, and the process for making these decisions.

4. The language used to paraphrase comments from the Policy Board on National Programme documents is inconsistent and at times imprecise. Some comments involve clear and actionable recommendations, while others are vague and leave much room for interpretation. This will make it difficult for countries to know how to comply with recommendations.

Specific comments:

Section 1.11

1. Line 2 – add “financial” before “pledges”

Section 1.12 [discussion of UN-REDD strategy]

1. Paragraph 1, bullet 1 – Clarify what is meant by the “*second phase of REDD+*”
2. Paragraph 1, bullet 4 – Clarify: “capacity building and awareness raising” *of/for whom?*

Section 1.16 [decisions and recommendations from NPD discussion]

1. We propose that the following Board recommendation be added based on the discussions that occurred on March 19: “*To improve transparency in the process of revising National Programme documents, the Board requested that the Secretariat report back to the Policy Board on how recommendations from the Secretariat, Independent Technical Review, and Policy Board are incorporated into the final National Programme document.*”
2. Paragraph 2 – we consider that the following sentence should be added to the end of the paragraph to reflect what was agreed by the Secretariat during the discussion of the Bolivia National Programme document: “*The Secretariat will identify which recommendations must be addressed in the National Programme document prior to signing of a grant, and which can be included in the action plan to be addressed during implementation. This information should be made available to the Policy Board.*” [Note: this applies to the last sentences of Section 1.20 and 1.23]
3. From correspondence with Tiina Vahänen we understand the recommendation by the Board to include our review of JPDs and R-PPs as part of the meeting documentation will be referenced in this section along with a link to the external UN-REDD website where the document is posted and should be titled: “*Global Witness - Review of JPDs and R-PPs Submitted to the 4th UN-REDD Policy Board and 5th FCPF Participants Committee Meetings: Provisions on Non-carbon Monitoring*”.
4. There are two sections labeled 1.16
5. Paragraph 6 – Recommend replacing “*components*” with “*elements*” to avoid confusion with the R-PP template, which is divided into “*components*”; replace “*considered in the design of*” with “*included as a part of*”

Section 1.17 [comments on Bolivia]

1. Line 3, what is meant by “*development sectors*”?; the Secretariat did ask for clarification on how different levels of government will be integrated, which is not reflected here. We recommend the last line should be changed from “*and provide more clarity on the MRV system to incorporate contributions from CSOs*” to “*and provide more clarity on how the programme will ensure an independent MRV system with the participation of civil society and promoting timely feedback for implementation of REDD+ activities*”.

Section 1.18 (comments on Bolivia)

1. Paragraph 3, bullet 1 – clarify what “process” is being referred to here
2. Paragraph 3, bullet 2 – should begin: “*Additional consideration of law enforcement and anti-corruption measures, and involving CSOs in monitoring...*”

Section 1.21 [comments on DRC R-PP]

1. Paragraph 3, bullet 2 – we recommend this be made clearer and propose it be changed to “*Stronger measures to improve law enforcement and address illegal cross-border trade, such as by joining the Lusaka Agreement on Co-Operative Enforcement Operations Directed at Illegal Trade in Wild Fauna and Flora.*”
2. Paragraph 3, bullet 9 – The document referenced here needs to be posted on the UN-REDD websites (external and internal) and a link provided to the external site.

Section 1.24 [comments on Zambia NPD]

1. Paragraph 4, bullet 5 – Propose this is reworded as follows: “*Addressing better the issues of governance, including law enforcement and anti-corruption measures.*” Note: our understanding is that Norway praised the inclusion of gender issues in the Zambia proposal.
2. Paragraph 4, Bullet 6 – Recommend changing it as follows to improve clarity: “*Stronger measures to improve law enforcement and address illegal cross-border trade, including through strengthening the implementation of the Lusaka Agreement on Co-Operative Enforcement Operations Directed at Illegal Trade in Wild Fauna and Flora to which Zambia is a party.*”
3. Paragraph 4, bullet 7 – This comment was first made by CSO Africa during the discussion of Bolivia’s NPD. Recommend also including as a bullet in Section 1.18, paragraph 3.