

Feedback on the Tanzania National REDD Strategy, prepared by the REDD Pilot Projects

Background

The following represents joint feedback on the first draft of the National REDD Strategy, which has been prepared by the REDD pilot projects in Tanzania. The projects met in Dar es Salaam on February 16th, 2011 to develop these recommendations and ensure their input was coordinated.

General Comments

The First Draft Tanzania National REDD Strategy (the “Strategy”) has much to commend it. In particular, we welcome that:

- it is very comprehensive and almost all the key issues are addressed in one way or another;
- it is recognised as a living document which will continue to evolve as new information becomes available from research, learning and feedback.

It is clear that the current version of the document is a compilation of inputs from different sources and that some updating and coherence is needed for the next draft. Specifically we note:

- the Strategy document is very long, and contains a lot of background information not directly relevant to the strategic choices to be made;
- as a result, some key issues lie “buried” among less important ones and critical policy choices remain open in the Strategy (e.g. status of community carbon rights, management of REDD funds). We believe REDD cannot progress until a clear decision is taken on these;
- some of the time frames are unrealistic for the tasks in hand, and some of the information is out-dated;
- the Key Result Areas need revising to take into account issues raised in the other chapters.

Bearing in mind the constraints to participation in the First Draft, and the steep learning curve all stakeholders are on, the next draft of the Strategy may be substantially modified. We trust that all stakeholders will be given another chance to comment on an interim version before the Strategy is finalised.

Key messages from the REDD Pilot Projects

The Strategy in its current form is ambivalent on certain issues and needs to state more clearly that:

1. ***Benefits of REDD+, including income, must reach the community level*** - There is an implication, never stated directly, that all REDD funds will go through the National REDD Trust Fund. Is this indeed the intention and how will resources flow to the communities who are custodians of the forest carbon and most affected by activities to reduce deforestation
2. ***Stakeholders must be involved in the decision-making and planning process*** - The National REDD Task Force has done an admirable job in producing the current draft. It is understood that this a temporary institution, and that it will evolve into a more inclusive body. We believe the time has come for civil society to participate fully in the process of designing and developing the REDD mechanism from now on.
3. ***Tanzania must commit to high social and environmental standards for REDD+*** - As a minor player in the emerging global REDD economy, Tanzania will need to compete with countries that have higher carbon densities and volumes. To do so effectively, REDD in Tanzania must be of the highest quality, upholding social and environmental standards beyond those essential for technical compliance. These qualities will differentiate Tanzanian REDD and make it more attractive to funders.

Specific comments on Key Results Areas

Key Result Area 1: REDD+ baseline scenario, monitoring, reporting and verification framework established

This combines two related but separate elements – the baseline and MRV. On the baseline, there should be a reference to the need to agree a national land use classification system that can guide all project developers, and the reference to IPCC 2006 standards in chapter 5 needs to be reflected in the KRA.

On MRV, there is no mention of the monitoring of social and environmental safeguards and outcomes. Not only is this required by many carbon standards, it is also mentioned in chapter 7, and forms part of the agreed REDD+ text from UNFCCC in Cancun (COP16).

PROPOSAL: Monitoring and reporting of social and environmental outcomes should be incorporated into a new Key Result Area (see below).

Key Result Area 2: Financial mechanisms and incentive schemes established

It appears that the Government envisions a national system where all payments pass through a national REDD trust fund. This needs to be stated clearly and unambiguously in the rationale. The task in hand then becomes how to ensure that incentive schemes result in payments to the lowest level possible (individual, household, village) and account for local power dynamics.

That this KRA highlights the need for a social safeguards policy is very welcomed. This should not only relate to the financial mechanism and needs to appear in other KRAs, including the revised KRAs 3, 6 and the new “X” as proposed below.

PROPOSAL: Redraft the strategic objectives, activities and outputs to reflect the need to develop national and sub-national incentive/compensation schemes that a National REDD Trust Fund will support. This includes governance of the Fund (linked to KRA 6).

Key Results Area 3: All stakeholders are engaged in the REDD+ implementation process

The interpretation of the term “engagement” is too narrow and focuses on practical implementation. Although the rationale uses the term “active participation”, the activities revolve mainly around training. Stakeholder participation is a broader concept that includes involvement in planning, decision making and monitoring, as well as implementation. This can become the new “governance” KRA.

PROPOSAL: Remove the training elements of this KRA and incorporate them in KRA 7 on training. Redraft the strategic objectives, activities and outputs to incorporate a more inclusive interpretation of stakeholder engagement that encompasses participation, transparency and accountability. This can help fill the gaps noted below in KRA 6 on REDD governance.

Key Result Area 4: All REDD+ schemes are well coordinated

The wording in this section is too generic and there is a danger that coordination will be interpreted as being confined to actors in the forest sector. It should recognise explicit overlaps and synergies with other sectors, in particular agricultural, water and energy, as well as coordination that links REDD issues to other aspects of climate change mitigation and adaptation. This KRA is a good opportunity to specify the actions around the transition of the National REDD Task Force into a more inclusive body.

The intention to address conflict resolution needs to be defined more clearly. REDD will generate multiple conflicts between multiple stakeholders, many of which may not be resolved simply by coordination. This overlaps with issues of governance.

PROPOSAL: This KRA contains elements of governance and stakeholder engagement. It could be usefully dismantled and incorporated into KRA 3 and KRA 6 respectively, as well as the proposed new KRA "X".

Key Result Area 5: All carbon market options are well understood / All fund based financing options are well understood (Note: The full draft Strategy and the Executive Summary give this KRA different titles)

A "good understanding" of funding options is essential, but does not in itself constitute a key result area. It needs to be backed up by a proposal on how a decision will be taken, and by whom, based on an understanding of the options. As such this is an activity that will contribute to outputs under KRA 2, 3 and 6.

PROPOSAL: Dismantle this KRA, or redesign it around the need to develop a business plan on how REDD in Tanzania will be funded

Key Result Area 6: Governance mechanism for REDD+ in place

This KRA confuses the two concepts of "good governance" and "good government," focussing on the latter. All the activities around legal and institutional arrangements and government policy. There is no mention of the engagement of other stakeholders in REDD governance, and neither of the key governance concepts of participation, transparency and accountability. The key issue of a redress mechanism (implied by the reference to conflict resolution in KRA 4) is a critical gap.

Nevertheless, it is important to ensure that the necessary legal and institutional reforms to support REDD do take place, particularly land tenure. Thus the two aspects of governance (policy reform and participatory decision making) could be usefully separated in different KRAs.

PROPOSAL: Re-name this KRA "Institutional and legal framework for REDD+ in place". The term "governance" could be incorporated into a new title for KRA 3 on stakeholder engagement.

Key Results Area 7: Training programme and Infrastructure for REDD+ developed

The need for building national capacity to manage REDD in the form of both infrastructure and training is noted in many of the KRAs. This KRA could usefully combine the training elements of all the other KRAs to avoid repetition, particular as a key activity is a training needs assessment.

This begs the question of who is training and who is being trained. In addition to government, in particular rural communities need to be taught about REDD and the

implications of REDD policies. This needs to be more explicitly recognised in this KRA, noting that there is an overlap and duplication with some of the provisions in KRA 9 on information and communication.

PROPOSAL : Make this KRA cross-cutting and address the capacity-building implications of the other KRAs.

Key Result Area 8: Current knowledge and scientific understanding of the target forests and adjacent communities improved through research

This represents the beginning of a research agenda with several important topics listed. However there are some important omissions, such as a better understanding of forest degradation and the gender impacts of REDD, to name but two. This listing prejudices the outcome of the research needs assessment, which is the first strategic activity. A mechanism is needed for prioritising what subjects are allocated resources for research, giving most attention to those that address the constraints to operationalizing REDD in the country. There is a danger that listing specific topics in the Strategy will somehow give them special status and lead to other areas being ignored.

PROPOSAL: Rewrite the strategic activities to remove the listing of specific topics until after the research needs assessment is completed.

Key Result Area 9: An effective information and knowledge communication system on REDD+ issues developed

The issue of information sharing is cross-cutting and needs to respond to the needs of different stakeholders. There are information requirements for international reporting; for effective engagement of stakeholders; for accountability; and for sharing learning. It is unlikely that a single system will address all these needs.

PROPOSAL: Remove this KRA as a stand-alone item and incorporate information activities into all other KRAs

Key Result Area 10: REDD+ strategy options for addressing drivers of D&D developed

Addressing the drivers of deforestation underlies all effective action to achieve REDD in Tanzania and so this result area could well be placed as No.1 not No. 10. The treatment here is comprehensive but unfocussed, and there is a significant amount of repetition both within

this section and also between it and other KRAs. Similar topics can be consolidated into more coherent sub-headings.

By including a very long list of direct and indirect drivers this KRA runs the risk of taking attention away from the most obvious areas where urgent action is needed. Strategies can be better defined if they are brought together under the priority drivers which are already well known – the demand for energy, the need for agricultural land, and the use of forest for income. The minor/indirect drivers can also be noted but should not be given prominence to the detriment of addressing the key drivers of deforestation and degradation in Tanzania.

PROPOSAL: Adopt a more ambitious strategic objective geared towards addressing the key drivers of deforestation rather than simply to “develop strategic options”. Prioritise the key drivers of deforestation and give them prominence in the strategy development process.

NEW KEY RESULT AREA X: System for monitoring REDD+ environmental and social safeguards developed

A rationalisation of the existing KRAs leaves some topics that may be overlooked if they are not identified as a specific result area. This includes

- developing standards for REDD+ in Tanzania
- promoting accountability of all stakeholders in standards compliance
- a system for monitoring and reporting
- a grievance and redress mechanism for when standards are violated

PROPOSAL: Engage stakeholders in designing a Key Result Area on REDD standards as part of the revision process for the National REDD Strategy

Summary

The outcome of all the above recommendation would be a more streamlined set of Key Results Areas, involving the removal of three (coordination, understanding funding, information) and adding one (safeguards).

Feedback on National REDD Strategy by TZ REDD Pilot Projects

KEY RESULT AREA	RECOMMENDATIONS
1 baseline and MRV	Include the monitoring of safeguards either in this KRA or in a new KRA
2 financial mechanism	Focus on mechanisms to ensure National REDD Trust Fund arrangements deliver resources and in particular income to the community level
3 stakeholder engagement	Re-frame this KRA to interpret stakeholder engagement as participatory management of REDD
4 coordination	Dismantle this KRA and incorporate into KRA 3 and KRA 6
5 understanding funding options	Incorporate into KRAs 2,3 and 6; or transform into a business plan for attracting future REDD funding to Tanzania
6 governance mechanism	Change the title, focus on institutional reform content of this KRA, and address broader “governance” in KRA 3
7 training and infrastructure	Incorporate capacity building needs of all KRAs and address overlap with KRA 9
8 research	Replace specific research topics listed with more generic areas to allow for future prioritisation of research needs
9 information & communications	Consider dismantling and incorporating elements into KRAs 1, 3,6,7, and 8
10 drivers of deforestation	Focus the objectives of this result area and Streamline the long list of sub-sections to give prominence to the key drivers
X safeguards	Design a new KRA on social and environmental safeguards