

Consolidated Comments to the draft National REDD+ Strategy for Tanzania

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1. Introduction

The National REDD Task Force provided opportunity for public comment to a draft National REDD Strategy in early 2011. The draft strategy builds upon a REDD framework document developed in early 2009. Comments of NORAD, the Norwegian Embassy in Tanzania and the DPG-Environment secretariat have been consolidated by the DPG-E secretariat to provide the DPG-E feedback to the National REDD Task Force.

2. General comments

The commentators congratulate the Task Force and the Secretariat for coming up with a strategy document that is a very good basis for discussion. The process of publishing it for comments and organizing a number of events to discuss the strategy is also very commendable.

The draft Strategy is mainly a background and scene-setting document. It describes the forest sector, the key institutions and policies and the deforestation drivers, and then includes a very long list of potential actions that are not prioritized or analyzed in terms of their cost, benefits or likely difficulty of implementation. While such a document may attract criticism in terms of its generality or obviously preliminary nature, it is arguably very appropriate at this stage of REDD+ development when many of the key challenges as well as the political, institutional and policy issues, have just begun to be identified and discussed.

In order to make the draft document more reader-friendly and to more clearly separate the scene-setting from the draft actions in the strategy, it might be appropriate to put the background information in an annex and to start the document with the proposed strategic actions (now chapter 6).

Strategic engagement and direction

- The strategy clearly acknowledges the need to broaden the consultations beyond the current Task Force, and to start **engaging with other ministries** to develop an understanding of REDD+ and defining actions to address interfaces with, for example, energy, agriculture, water and lands. However, the strategy needs to be clearer on how actual gains in relation to drivers (KRA10) will be achieved including how the REDD strategic options will be **mainstreamed within sector programmes and expenditure frameworks**. Otherwise, the strategy runs the risk of never being fully owned or implemented across different sectors. In a similar way, the strategy should be clearer on how it is linked with higher level development strategies such as MKUKUTA in practical terms.

- REDD+'s role in Tanzanian development needs to be considered in relation to broader issues in agriculture, food security and climate change adaptation, going **beyond its potential to provide bonus payments for keeping forests intact**. Many of the most important *drivers* of deforestation and forest degradation originate outside the forestry sector, as will the actions needed to achieve REDD+. At a minimum, to stand any chance of addressing these issues adequately, the finalization of the National REDD+ Strategy needs to be elevated to **higher political levels** within a broader range of sectors, including agriculture, water, energy, planning and finance.
- The potential **contributions of REDD+ to the national economy** should feature more prominently in the strategy in order to attract the attention of the Ministry of Finance and other sector ministries – a discussion on this could be linked to the box showing the overall economic contributions of the forest sector.
- Further, **indicators** can in general be made more smart and conducive for engaging the higher levels of government (e.g. to get some of them into MKUKUTA and PAF processes). Thus, the *level* of CC funding may be more interesting than *number* of REDD+ projects (c.f. KRAs 7 and 8).
- In terms of **timeframe**, developing the national REDD strategy is set to be finalized by December 2012 (section 2.1, p8), while the deadline for many of what are termed 'outputs and key performance indicators' in chapter 6 (strategic interventions) is also 2012. As such, the strategic interventions will no longer be time-relevant by the time the strategy is finalized. The strategy document should be defining several objectives and indicators for a longer time period beyond 2012. Indeed, achieving many of the current indicators would require a longer time period beyond 2012. Thus, all indicators require some cross checking from the perspective of feasibility. It may be worth separating short-term (pre-2012) and longer term indicators.
- The overall **mission** and **goal** statements are good, although relevant elements of the National Framework for REDD objective ("reducing emissions related to deforestation and forest degradation as well as reducing poverty of forest dependent communities") appear to have been lost.
- The **objectives** are somewhat vague (section 1.1.3) and would benefit from being defined more clearly. Statements on fund management could be useful and level of ambition could be defined for many of the elements. Objectives related to the process of making difficult choices and zoning of forest versus other land uses would be valuable elements.

3. Comments to the chapters 1-5

Chapter 1

- An **Acknowledgements** section and a **Foreword** would be useful additions.
- The Background section (1.1) requires an accurate **definition of REDD+** and should double check the definition provided for REDD++.

- Further, the Background section should refer to the **phased approach** of national REDD+ preparedness and implementation that is widely accepted and being undertaken in most REDD+ early starters.
- Page 1, para 3, line 6. “BAP were” doesn’t seem to make sense here. Should it be “NAMAs”? Also, next sentence, it is not clear what the initial “They” refers to? Page 2, para 1, last line. Needs Cancun update.
- Section 1.1.2 second paragraph regarding forests role in climate change mitigation should be moved earlier in the Background section since it is not specific to the Tanzanian scene. This paragraph should also mention the role of forests in climate change **adaptation**.
- Several parts of the strategy, particularly in the introductory sections, require **referencing**. For example, the figures provided for area of forest categories (p3) and rates of deforestation (p4).
- Section 1.1.2 would benefit from the inclusion of a **map** of Tanzania showing the distribution of forests/woodland.
- Section 1.1.2 would also benefit from reference to the **relevance** of land/forest-related GHG emissions to overall emissions in Tanzania, as well as relating Tanzania’s land/forest-related GHG emissions to other countries in Africa.
- The **photo** in section 1.1.2 would be more appropriate as a species found in Tanzania.
- An alternative should be sought for the term “in a nutshell” used in section 1.2.
- Use of the terms “REDD policy” and “REDD strategy” needs to be standardized throughout the document.
- Page 3, para 2, line 1. This sentence doesn’t seem consistent with the previous paragraph.
- Page 4. While appreciating this is an introductory section, the overview of the drivers of deforestation in Tanzania is rather superficial. There is no mention of demands from a growing, impoverished population, energy needs of urban areas, charcoal trade, competition with agriculture and issues of food security. Very little emphasis on livelihoods, which surely is the main issue and concern in Tanzania.
- Page 5, first three paras read like a textbook that seems very remote from the realities of Tanzania., but with some very strange assertions, such as “The determination of the biodiversity compensations based on foregone timber sales is relatively easy”, which seems arguable at best, and “REDD+ activities, which include biodiversity conservation and carbon sequestration activities, can also benefit from international mechanisms since these provide benefits at a global scale.” What does this mean?
- Page 5, same para: “The adoption and implementation of REDD+, therefore, provides an exceptional opportunity for Tanzania to benefit from fund based compensation arrangements”. Adoption and implementation by who? Tanzania or the international community? Who says it is going to be fund based? How will readers know the difference between fund based and market based •

REDD? Some complex ideas are perhaps oversimplified and mixed up here, which is going to make it even harder to communicate REDD+ to a wider audience.

- Page 5. This Strategy Mission may have already become outdated by the Cancun developments.
- Page 6, section 1.1.1.4 is generally well written and helpful. But page 6, para 3 states: “Specifically, the payments for REDD+ will be made to countries on the basis of their average or net achievements in reducing emissions from forests.” This may be a premature judgment of how REDD+ will operate.
- Page 6, last line: This is critical: “for Tanzania to effectively participate in the REDD+ initiative efforts should be made to reduce deforestation and forest degradation happening in general land forests and reserved forests. This should be done mainly by addressing the direct and indirect causes of deforestation and forest degradation. This Strategy provides guidance on how best to address the identified drivers, underlining causes and impacts of uncontrolled deforestation and forest degradation in the various agro-ecological zones.” This is a really important point. Even without knowing exactly how Tanzania might be rewarded for improved performance in the forest sector, the strategy needs to describe how the country might achieve REDD+ gains that reduce carbon emissions. In practice this means returning to and effectively addressing many of the challenges and constraints that have faced the forest sector over recent decades. While virtually all of these issues have been elaborated in a succession of donor-financed reports, relatively little effective action has been taken and the capacity to do so remains limited. REDD+ may offer a unique opportunity to mobilize the political commitment and will power needed to address these problems.

Chapter 2

- Chapter 2 would benefit from a **timeline** of important events or processes. Further, the second paragraph of section 2.1, which discusses the timeframe for completing the strategy document and current phase of strategy development, is probably better placed within a covering letter as oppose to part of the document text since it will soon be outdated.
- The National Framework for REDD developed in 2009 is based on the objectives of “reducing emissions related to deforestation and forest degradation as well as reducing poverty of forest dependent communities” (page 8, para 1). What seems like an excellent set of objectives here was apparently not carried forward into the mission or goals of this Strategy (pages 5 and 6).
- Page 8, para 1: “The REDD+ Strategy is closely linked to the current national growth and development strategies such as the National Growth and Poverty Reduction Strategy Programme (MKUKUTA), the National Forest Programme and other strategies which contribute to effective conservation and utilization of Tanzania’s natural and renewable resources and improving the livelihoods of its people.” At some point these different strategies will need to be compared and integrated where appropriate, otherwise it would be easy to come to the conclusion that Tanzania is being encouraged or pressured by its donor partners to prepare a series of disconnected strategies that will, at best, be impractical and hard to implement.

- The **subsections** for section 2.2 (strategy development process) would be more logical if they followed the three phases described in the first paragraph (i.e. preliminary analytical phase, strategic analysis and piloting phase, strategy consolidation phase).
- The strategy does not specify what key lessons were derived from **study tours** (section 2.2.1).
- Table 2.1, showing **stakeholder groups**, is somewhat confusing and appears to give unwarranted prominence to a number of stakeholder groups. For example, the terms ‘Development Partners’ and ‘Non Governmental Organizations’ would be preferable to individually named institutions. Why is World Bank a stakeholder, but not DFID, Danida or Norway? This table is restrictive in terms of private sector by only including ‘trading companies’ and no reference to private (small-scale and commercial scale) forest owners or managers. It is not clear why TANAPA, a custodian of large areas of forest, is included as a tertiary stakeholder.
- Section 2.2.2.2 on forest dependent communities deserves more reference to United Nations and African Union documentation relating to **Indigenous Peoples**.
- Page 10, last para. Decision 2/CP.13 of who or what?
- Several clarifications are required in section 2.2.2.3 (b) **consultations** for the development of the National REDD Strategy, including examples of sectoral policy overlaps and conflicts (point iii), elaboration of gender concerns (point vii), and correction to the assumption that alternative sources of income must be found if a forest is put under REDD+ (point i).
- The **SWOT analysis** in Table 2.2 should include the issue of forest reserve encroachment. Further, it would be appropriate not to name organizations in this table.
- Page 12-13: This set of issues raised during the Strategy consultations are very insightful and valuable. These will need to be constantly highlighted, returned to and eventually resolved if REDD+ is to become workable in Tanzania, and most are political rather than technical or procedural in nature. The useful list of strengths and weaknesses listed in Table 2.2 (page 14) highlights further issues that will need to be addressed.
- Section 2.2.3 that summarizes the findings of **in-depth studies** is very long and there is scope for consolidating/summarizing the information. The most pertinent points could be better incorporated into other relevant sections of the strategy (e.g. key findings from study on Trust Fund could be incorporated into section 4.2.2 ‘institutional framework for REDD activities’; findings from study on legal/institutional review could be incorporated into section 4.3 ‘policy environment and legal framework’; study on role of REDD for rural development could be incorporated into chapter 3 ‘baseline conditions and situation analysis’; study on information and communications could be incorporated into section 3.8 ‘information, knowledge dissemination and networking’).
- Page 14+: This section summarizes the “in depth” studies commissioned during the strategy development process. These issues were well selected, they are critically important and they will be very hard to resolve. Most require political decisions and commitments, and cannot be resolved at a technical level. The studies that have been done so far should be regarded as introductory work on these topics that primarily serves to start an informed debate under Government leadership.

- Page 15-16: Trust funds for REDD+. Some useful operational and procedural information is presented here, but it all seems based on an implicit assumption that setting up a trust fund for REDD+ in Tanzania is a good idea and should happen. That may turn out to be the case but, at a strategic level, the pros and cons of a fund-based approach to REDD+ need to be identified and considered first. There is little point in proceeding with the demanding task of setting up trust funds unless the international community give some firm indications that they are prepared to invest in such a fund.
- Page 17: A study confirming high dependence on fuelwood and charcoal as sources of energy is described. The summary makes a number of important points that need to be kept in mind although it concludes with a curious recommendation that Tanzania switch to renewable energy sources that are both subsidized and left to market forces. The economic and biophysical dynamics of the critically-important charcoal production and trade, in particular, will need to be fully understood and taken into account prior to designing any REDD+ interventions.
- The description of **pilot projects** (section 2.2.3.2) would benefit from additional detail in terms of their scope and perhaps the inclusion of a map.
- References to **Norwegian support** should be corrected to read “up to NOK 500 m” instead of USD figures given.

Chapter 3

- The order of section 3.1 on **forest resource base** could be improved, perhaps in the following way: general information on forests and their links to climate change; land resource/forest status on mainland; land resource/forest status in Zanzibar; past experiences/approaches; and drivers.
- With regard to the section on **past experiences** with reducing deforestation and forest degradation, it currently includes centralized natural forest management, PFM, plantations, woodlots/treefarms, forest landscape restoration and integrated conservation and development and landscape based projects. The discussion does not always refer to the REDD agenda. More importantly, there appear to be a number of important **omissions in related forest initiatives**, including Payment for Environmental Services, Agroforestry, Conservation Agriculture and Forest Law Enforcement and Governance, to name but a few.
- The discussion of drivers contains very little **quantitative information**, making it difficult to understand relative importance on spatial or temporal scales. Issues relating to **corruption** and other reasons for governance shortfalls are not presented in the discussion of drivers.
- The information contained within Section 3.5 on **forest carbon trading mechanisms** would flow better if inserted earlier in the draft strategy document. Chapter 3 in general would benefit from more information on **carbon stock and baseline information**, as presented in UN REDD proposal and FCPF R-PP.

- Correct spelling of Ahrends *et al.* reference.

Chapter 4

- Page 48: The promise of Participatory Forest Management (PFM) is highlighted, but also the painfully slow rate of adoption.
- Page 48: Sustainable forest management is not being achieved because of “poor governance at local as well as district, regional and national levels. At the local level, key governance issues concern (i) corruption, (ii) elite capture and/or (iii) minority marginalization in terms of access to forest resources, (iv) low accountability, (v) lack of transparency, (vi) low participation, and (vii) weak law enforcement. At higher levels, the main issues are corruption, weak law enforcement, and accountability.” Any REDD+ strategy that is unable to address these very challenging issues seems unlikely to succeed. Arguably, any internationally-supported REDD+ efforts should use efforts to address these fundamental issues as a funding criteria.
- In response (page 49), “this Strategy has adopted a problem solving approach encompassing multi-sectoral collaboration through the formation of an expanded partnership in management of REDD+ knowledge, information networking and communications as a way forward in the long path of resolving conflicts and improving the overall quality of management of forest resources in the context of REDD+”. Fine words, but it would be hard to argue that in practice this actually means anything.
- Page 49: The National Climate Change Steering Committee is highlighted. Unfortunately, until at least December 2010 this committee had not been active.
- Discussion of **REDD Fund** should be included in the same way that NCMC is covered. This could incorporate information summarized from the relevant in-depth study.
- Similarly, section 4.3 on **policy environment and legal framework** would benefit from the incorporation of findings from the legal/institutional in-depth study in order to present challenges with the current set-up with respect to climate change and REDD.
- References made to **MKUKUTA** (section 4.3.1) should be updated to reflect the latest national growth and poverty reduction strategy.

Chapter 5

- Discussion of MRV requirements would benefit from a **diagram** that illustrates the different levels (i.e. international, national, local).

4. Comments to the Key Result Areas

- “This National REDD+ Strategy identifies ten (10) main strategic interventions and/or key result areas for the REDD+ implementation process in Tanzania”. These strategic interventions are well laid out in a way that facilitates further discussion. There is little prioritization and no information on implementation costs, however, so this is some way short of an Action Plan.
- The **Key Result Areas** (chapter 6) are currently largely based on the framework produced in early 2009, with the addition of a KRA on addressing drivers. There is **scope for consolidating or rationalizing** the KRAs. For example, KRA2 (financing mechanism and incentive packages) and KRA5 (financing options) are closely related and would be better combined. As another example, KRA 4 (coordination of all REDD schemes) and KRA6 (establishment of a governance structure for REDD) appear to have considerable overlap and may be better if combined into one KRA.
- Several of the Key Result Areas entail a list of **studies and plans**. These are indeed necessary, but it will be important to ensure that processes of developing awareness and skills base, discussing policies, testing REDD mechanisms and developing the necessary institutions does not stop while making various plans and assessments. While preparing the plans and studies, it is important to clearly specify how to operationalise the results of those studies. Clear and user-targeted recommendations have to be an integral part of the studies and plans commissioned.
- Generally, it would be helpful to specify the outputs and indicators even more: What are the responsible institutions for the output, how much funding is needed to achieve the output, what are the necessary other institutions to achieve the output.

KRA1 (baseline and MRV) does not make any reference to NCMC under development (only NCAST is mentioned which is one of the tools of the proposed NCMC), or LiDAR methodology development process and role as a demonstrator for the GEO FCT task. This KRA should also cover community monitoring in better detail.

KRA2 (financing mechanism and incentive packages) is apparently placing emphasis on a Trust Fund, without sufficient justification. The role of Ministry of Finance is conspicuously missing. The need for cost curves and comparative studies on land use could be mentioned. Mechanisms for benefit sharing should be discussed more directly, as well as the issue of national versus nested approach to handling REDD payments in the future. The implications of the fact that both voluntary markets and compliance markets are available should also be commented upon. Key Result Area 2 assumes a REDD+ trust fund. As noted above, this may be premature.

KRA3 (stakeholder engagement) currently contains a few, very broad strategic objectives for PFM, private sector and civil society. There will be a need for greater elaboration on stakeholder engagement in a more practical sense.

KRA4 (coordination) has a heavy emphasis on central government and therefore includes few measures with relation to decentralized coordination and sub-national project coordination, as well as coordination within private sector and civil society.

KRA5 (fund based financial options) neglects consideration of market-based options that remain part of international deliberations. This KRA also does not cover voluntary markets. A strategic activity under this KRA would be to identify and remove bottlenecks to accessing carbon funding (e.g. related to the existing opportunities under CDM and VCS). KRA5 may be better combined with KRA2 since both relate to financial mechanisms.

KRA6 (governance structure) does not make much mention of other parts of government including local government and independent monitoring mechanisms. The goals under KRA6 are more like process elements (studies); the goals could be reworded to be the results of actions taken after such studies. Based on the legal and policy study already undertaken, clearer strategic direction is required on some fundamental legal issues (such as existing conflicts in legal framework, issues of carbon rights, etc.), instead of suggesting another set of studies. There could be scope for consolidation of KRA4 and KRA6.

KRA7 (training and infrastructure) some repetition with other KRAs (e.g. infrastructure elements of strategic objective 2 already under KRA1 and financial mechanisms of strategic objective 3 already under KRA2), leaving scope for consolidation with others, perhaps KR8.

KRA8 (knowledge and understanding) needs better links with the existing Climate Change Impacts Adaptation and Mitigation (CCIAM) programme.

KRA9 (information and communications) appears to focus more on education and communications rather than information management.

KRA10 (drivers) is very broad and contains in fact many of the elements of a long term programme to address all the reasons for deforestation. It is not clear how each of the strategic activities will actually be addressed and may require some more prioritization to become realistic. This is the key to the entire strategy: how are REDD+ gains actually to be achieved? As noted here, "in order to be successful, a National REDD+ Strategy must target both direct and indirect drivers of deforestation and forest degradation".

In addition to the institutional constraints noted on page 48, major direct causes of deforestation and forest degradation are identified as “settlement and agricultural expansion, overgrazing, firewood and charcoal production, uncontrolled fires, timber extraction, development of infrastructure and industry, the refugees factor and most recently the introduction of large scale agriculture for bio-fuel production. These direct causes of deforestation and thus forest degradation are indirectly driven by market and policy failures, rapid population growth and rural poverty, and the poor state of the national economy”.

Five pages (82-87) of potential activities are listed under Key Result Area 10, more than 100 individual actions in a variety of sectors. **A high priority for the next phase of strategy development will be to prioritize these actions, estimate costs and assess the political commitment to proceed with them.** Many of these actions will not only have significant financial and economic costs but, from the Government’s perspective, significant political costs also. Such prioritization and planning for action steps would be extremely challenging under any circumstances, but it is even harder when neither the Government nor people of Tanzania have any clear idea of the magnitude of likely financial benefits from REDD+ to weigh against these costs. Key actions to engage with the other REDD+ relevant sectors could be included in this chapter. Relations to key drivers should possibly be separated in special chapters – e.g. for agriculture, energy, livestock. Elaboration on policy conflicts should be more detailed – there are tradeoffs between REDD+ and e.g. wood energy policy, livestock policy, policy on agriculture that should be discussed more directly.

4.1. Gaps in issues covered by KRAs

- **Safeguards:** It is recommended that an additional KRA be added to cover strategies and monitoring of **social, environmental and governance safeguards**. In this way, the third strategic objective under KRA2 could be removed.
- **Forest management:** While the situation analysis (section 3.2) covers some aspects of the forest resource base, forest (carbon) management as a whole receives inadequate attention, even if it were to simply recognize some existing key elements of the Forest Policy. Thus, it is unclear regarding the relevant roles of central and local government forest reserve management, other protected areas, participatory forest management, sustainable forest management, forest restoration, plantations and agroforestry as an integrated approach. This should arguably form a KRA.
- **Anti-corruption:** The strategy does not present fully issues of anti-corruption measures and strategies, despite the known existence of such governance challenges to the forestry sector and risks associated with potential increases in fiscal inflows to the sector through REDD (c.f. mention of corruption, elite capture, minority marginalization, low accountability, lack of transparency, low participation, weak law enforcement). Such strategies could perhaps be included within KRA6.
- **Agriculture:** It seems that agriculture, as one of the key drivers of deforestation and forest degradation, could warrant becoming a KRA in its own right.

- **Nested arrangements:** Options for nested arrangements are not clear. For example, how such sub-national projects will be incorporated into national level thinking and structures, especially with respect to MRV and benefit sharing.
- **Permanence, additionality and leakage:** Such fundamentally challenging topics appear to be only superficially discussed and strategized.
- **Land use planning:** The importance of land use *planning* towards achieving REDD does not appear to receive the deserved attention in the current presentation of KRAs.
- **Cost effectiveness:** The strategy needs to reflect upon cost effectiveness (maximum possible reduction in emissions per unit of expenditure).