



Recommendations from Civil Society Organisations for Tanzania's 2nd Draft National REDD+ Strategy and Draft Action Plan

Summary of Key Issues

We welcome the improvements made in this second draft, and thank the National REDD+ Task Force for considering our recommendations on several remaining issues and concerns, including the need to:

- Prioritize key drivers of deforestation and forest degradation, including by quantifying estimates of carbon losses from different drivers and expected emissions reductions from different interventions. Interventions should also be evaluated with regard to their alignment with safeguards.
- Make a clearer commitment to safeguards development, implementation, monitoring and enforcement, e.g., through a dedicated KRA.
- Clarify land ownership, particularly with regard to understanding village land vs. general land, and explicitly link carbon ownership to land/forest tenure.
- Strengthen commitment to gender equality, good governance (including accountability, transparency and participation), and cross-sectoral action on REDD+.
- Strengthen commitment to implementing equitable benefit sharing, including through well governed systems that allow for locally appropriate approaches coupled with a coherent national scheme (e.g. a nested approach).
- Calculate the overall likely benefits and costs of carbon reductions from Tanzania's forests, including to mobilise sufficient funding from different sources to ensure success.

We - civil society organisations facilitating Tanzania REDD+ pilot projects, including African Wildlife Foundation (AWF), CARE Tanzania, Jane Goodall Institute (JGI), Mpingo Conservation and Development Initiative (MCDI), Tanzania Community Forest Network (MJUMITA), Tanzania Forest Conservation Group (TFCG), Tanzania Traditional Energy Development Organization (TaTEDO), Wildlife Conservation Society (WCS), and Wildlife Conservation Society of Tanzania (WCST) - **commend the National REDD+ Task Force (NRTF) and its partners for preparing the 2nd draft Tanzania National REDD+ Strategy** ('the Strategy') and **draft Action Plan, and for offering an opportunity for feedback and comments**. This note provides feedback on the Strategy and Action Plan in light of previously submitted CSO [recommendations](#) and [feedback](#), as well as further reflections based on pilot project experience. The recommendations aim to help ensure that the Strategy and Action Plan support equitable, effective and efficient REDD+.

Although prospects for a formalised international regulated carbon market including REDD+ under the UNFCCC have now receded to 2020, considerable global momentum remains around REDD+. The recent experiences of countries such as Brazil, Indonesia and Guyana suggest that if a credible strategy can be produced, then Tanzania could obtain substantial funding to implement it. A national REDD+ strategy does not necessarily need to be comprehensive, and may even benefit from starting with a defined focusⁱ. However, it does need to be specific and set out a clear path for action. The present draft strategy does a good job of defining the overall context, but it is weak on specifics and would benefit from defining priorities if it is to attract major international finance.

Key issues that could benefit from greater clarity in the Strategy and Action Plan:

Causes of deforestation: The strategy notes that the **relative importance of different drivers of deforestation and forest degradation has not yet been determined** (p12). Section 3.5 provides some figures relating to forest loss, but these are all at least 5 years out of date, and need translating into tonnes of carbon. We believe that quantifying the impacts of different drivers of deforestation and forest degradation should be a top priority. **Without such information it is impractical to craft a definitive strategy.** Even where exact numbers are not clear, it should be possible to proceed initially based on estimates, especially if the ranges on these estimates are considered so that uncertainty and risk can be managed.ⁱⁱ

Protection of community land, forest, and tenure rights, including by explicitly recognizing that most unreserved forests are on village land, and that villages have rights to own and benefit from carbon stored in biomass on village lands: We appreciate that the Strategy includes descriptions of general and village land, recognizes a source of confusion surrounding these lands, and points to the fact that serious land security concerns arise from contradictory interpretations of them (p25). However, we are concerned that the Strategy retains the interpretation that "17.3 million ha [of national forestland] are unprotected forests in General Land" (p2), and that "about 18 million ha of forests (50%) have been gazetted as forest reserves under the central government, local authorities, village land forests and plantation forests. The rest of the forests are on General Lands that are unreserved" (p15). This interpretation incorrectly implies that villages lack legal rights to use and manage forested land outside of village forest reserves. These varying **interpretations (as presented in the Strategy) need to be changed and aligned with the Village Land Act to ensure REDD+ fully respects community rights**, recognizing that most unreserved forest areas in Tanzania are in fact on village land, which villagers have a legal right to use (see previous [recommendations](#)). The draft Strategy and Action Plan also *do not explicitly recognize that carbon ownership is linked to land/ forest tenure*, leaving communities and other forest owners vulnerable to losing out on rightful benefits, or possibly even compromising their current legal right to use and manage recognized forest land.

Clear commitment to developing, implementing, monitoring and enforcing comprehensive national social and environmental safeguards: The draft Strategy does not itself establish safeguards, but does commit to establishing clear National REDD+ Safeguards by December 2012 (p35). The NRTF, its Technical Working Groups (TWGs) and other stakeholders are engaging in safeguards trainings and development, but it seems their efforts to date are not well reflected in the Strategy or Action Plan. The Strategy should include:

- A dedicated safeguards KRA, or more mainstreaming of safeguards across KRAs.
- Clear steps for inclusive and comprehensive safeguards development.
- Clarity regarding the international safeguards on which Tanzania will draw. The Strategy and Action Plan imply that the Strategic Environmental and Social Impact Assessment (SESA) / Environmental and Social Management Plan (ESMP) framework will be used, but do not specify whether this will incorporate, inter alia, UN FCCC, World Bank, UN-REDD, and/or REDD+ SES safeguards/ standards content.
- Clarity regarding how REDD+ safeguards might build on existing national measures. EIA is a potentially powerful starting point for safeguards implementation, but the current EIA regulations do not cover all potential REDD+ social and environmental issues, and may not apply to all local REDD projects.
- Commitment to ongoing safeguards monitoring at the project and programme levels, linked with other REDD+ systems. SESA/ ESMP may not be sufficient to guarantee this.
- Commitment to safeguards enforcement, including conflict resolution and grievance mechanisms.
- More systematic integration of safeguards throughout the Strategy. We recommend that, as the national safeguards are developed, the Strategy and Action Plan be updated to reflect them more systematically. Even at this stage, there can be a clearer commitment to aligning the Strategy to robust safeguards. For example, the Action Plan includes, “educat[ing] and advocate[ing] abandoning environmentally, socially and economically unfriendly traditions and cultural beliefs” (p45) and documentation of traditional knowledge. There should be an explicit commitment to carrying out such activities in line with safeguards. Other key international safeguards issues – including free, prior and informed consent (FPIC) and refraining from forced eviction – are not mentioned in the Strategy or Action Plan.

Gender equality and women’s empowerment in REDD+ development and implementation: There is currently no explicit mention of gender equality or gender equity in the Strategy or Action Plan. The Strategy includes “developing clear engendered guidelines for land tenure” (p46), specifies that “SESA will give special consideration to... gender needs” (p48), and mentions women’s groups among those to be included in MRV efforts. The Action Plan includes operationalizing “engendered land tenure guidelines” by 2015 (p59). These are important steps, but the Strategy and Action Plan **would be strengthened by a more explicit commitment to gender equality in REDD+**. Further, actions to address gender issues in tenure are set to happen relatively late in REDD implementation (2014/2015) despite the availability of existing studies and relatively clear legal provisions regarding gender equality and women’s land rights.

Lack of cost-benefits analysis: The strategy appears to assume that international funds for REDD+ will more than cover the costs of implementation. However, this is not certain. MRV is expensive, as shown by the cost of the NAFORMA fieldwork. The strategy should set out the GHG emissions reductions that can reasonably be expected from REDD+ activities in Tanzania, and all the costs associated with delivering these, monitoring and reporting, benefit sharing and implementing safeguards. Calculating the overall cost of carbon reductions from Tanzania’s forests will be critical to mobilising sufficient funding from different sources to ensure success.

General Comments:

- We recognize and welcome the improvements that have been made in this second draft.
- The Action Plan, and the linking of specific activities and objectives under KRAs, add clarity to the Strategy.
- There is still substantial overlap between some KRAs (see specific suggestions below).
- The Strategy and Action Plan are relatively comprehensive, though we believe several KRAs and Action Plan sections could be further elaborated, while the background remains longer than is necessary.
- Action Plan elements are quite general, and many are initial steps (e.g., undertaking studies) rather than actions on specific decisions (e.g., implementing a clear system for funds management and distribution). We encourage the NRTF to continue to treat these as living documents, to be updated as REDD+ develops.
- We welcome the updated timelines, though are concerned that some still seem over-ambitious while others (e.g. addressing gender issues in tenure in 2015) seem later than is necessary or desirable. The Action Plan would also benefit from defined milestones towards completion of the stated goals, including so that stakeholders can know when to expect detailed draft proposals for all the new policies and institutions that the strategy calls for.
- The strategy may benefit from a certain amount of restructuring. Specifically, Chapter 7 on Strategic Environmental and Social Impact Assessment, located at the end of the strategy, includes important analysis of key risks and issues, e.g., that *'REDD activities could set off a forest land-grab...'* (p49). This analysis could be expanded and brought forward in the strategy, in order to inform the strategic choices of interventions that are subsequently made.

Feedback on specific Key Results Areas (KRAs) and associated Action Plan elements

KRA 1: REDD+ baseline scenario, monitoring, reporting and verification systems established

- We welcome the Action Plan steps to establish baselines, the NCMC, and reporting systems. However, we **hope that detailed guidance for monitoring and reporting systems will be forthcoming soon**, including specification of an internationally recognized Land Use / Land Cover (LULC) classification system (e.g. FAO's Land Cover Classification System and international standards set out by the IPCC) to guide all project developers.
- The Strategy and Action Plan should make more explicit **links between MRV, safeguards, and benefit sharing systems**. While chapter 5 stipulates that "a robust monitoring system will provide social and economic information on impacts and benefits of REDD+ at community levels" (p27), such links **should be reflected in the KRA and Action Plan**. Integrated information systems may be required under the UN FCCC. We welcome the inclusion of co-benefits mapping as part of MRV, but recommend that this be better linked to KRA 2. (Also see below recommendation for specific KRA on safeguards)
- Chapter 5 also states that a national MRV system should provide "reliable, accurate and up-to-date information" and that this information should be "continuously available and focused on policy areas where actions are taken" (p.27). The strategy, however, does not demonstrate how the proposed solutions N/ZAFORMA meet these requirements. In particular this KRA should link to KRAs 2, 4 and 5 to ensure that funding is in place to sustain these systems.

KRA2: Financial mechanisms and incentive schemes for REDD+ established

- We recommend that the KRA and Action Plan better reflect the **need for clarity on how funds will actually be distributed and managed**. It is implied that there will be a national fund management and distribution system, but it is not clear how funds will actually be distributed across levels, or that this will be linked to carbon accounting, benefit sharing mechanisms, safeguards monitoring, etc. Funds will

need to **transparently, efficiently and fairly reach all levels, including villages, households, and individuals.** Given this, and also taking into account that the most appropriate approaches may only become clear over time and that pilot projects are already taking a variety of approaches, we encourage the NRTF to maintain openness to different options at this stage. As part of this, we recommend that the Government **consider a nested approach**, whereby forest communities and their partners can develop local approaches to aggregating carbon and accessing funds, while ensuring robust national systems for carbon monitoring, national funds distribution, and safeguards. Such an approach, building as it would on existing initiatives, would provide a much quicker route to developing implementation capacity than a single national system.

- While we commend the steps already outlined with regard to “incentive and compensation schemes”, we **recommend that the KRA and Action Plan include more explicit commitments to and steps for developing, implementing, monitoring and enforcing equitable REDD+ benefit and cost sharing.** This should include differentiation of ‘benefits’ and ‘co-benefits’, as the Strategy currently refers primarily to the sharing of ‘co-benefits’. The NRTF should consider mechanisms that allow communities to define locally appropriate approaches within a transparent and fair national system. The system should also be linked to MRV and safeguards.
- We recommend attention be given to the governance issues surrounding the implementation of PFM that are listed on p.16.
- We recommend that the Strategy specifically refer to sharing of any benefits accrued from carbon by Protected Areas (authorities) with adjacent communities, in addition to the current references to REDD+ in the context of PFM.
- We welcome the commitment to developing national safeguards by December 2012, but **recommend that this be covered in a dedicated KRA or better mainstreamed throughout KRAs.** (See below)

KRA 3: All stakeholders are engaged and actively participate in the REDD+ implementation process

- We welcome the change in the KRA title to include “actively participate”, though associated Action Plan sections still refer primarily to “community engagement” and learning from CSO pilot projects.
- The scope of participation is not clear. The KRA would be strengthened **by a clearer commitment to participation and effective representation** for community groups (with gender considerations), civil society, and private sector **at all levels and phases** of REDD+. More emphasis should also be given to **transparency, accountability and information sharing** as part of full and effective participation.
- We welcome the commitment to training for local communities and others, but recommend that this be combined with KRA 7.
- We **welcome the commitment to learning from pilot project experience**, and hope this will be considered across the issue areas. However, as this is the only CSO engagement specified, we **recommend that CSO participation go well beyond this.** CSOs can continue to play critical roles in REDD+ going forward. For instance, the Strategy could commit to looking at the extent to which pilot REDD projects could be rolled out further, and compare their relative effectiveness and efficiency, both between the projects and against government run pilot activities.
- While the composition of the NRTF is not described in the draft Strategy, we **welcome the addition of a CSO representative to the re-launched NRTF**, as well as the civil society, community and private sector representatives in the TWGs. The composition of the more permanent national bodies should also include expanded community, civil society and private sector representation.
- The timeframe for the majority of community participation activities under the Action Plan is 2015. We encourage the NRTF to undertake such actions as a **matter of urgency** (i.e., before 2015).

KRA 4: All REDD+ schemes are well coordinated

- As stated in previous [feedback](#), the wording under the KRA is generic and leaves it open to the interpretation that coordination needs are confined to the forest sector. Inter-sectoral links are much clearer in the Action Plan, but the **KRA could more explicitly recognize such links**, in particular to agriculture, water and energy, as well as linking REDD+ to other aspects of climate change mitigation and adaptation.
- The Strategy should be wary of a single solution blueprint that is applied uniformly in all cases. Better would be a **common framework that supports multiple solutions applicable to different situations**, e.g. montane rainforest versus miombo woodland, or where agricultural expansion is the main driver of deforestation versus demand for charcoal.
- This KRA has **important ties to governance, legal frameworks and safeguards**, which should be clarified. This could be done by incorporating this KRA into others.ⁱⁱⁱ
- Action Plan elements to support existing conflict resolution mechanisms are welcomed, but **additional resources and dedicated processes may be needed for effective and equitable REDD+ conflict resolution**.

KRA 5: All REDD+ financing options are well understood

- While key, understanding funding options does not in itself constitute a KRA. This KRA could be **eliminated, or revised to reflect the need for a business plan on Tanzania REDD+ funding**. A strategy should seek to go beyond just understanding the various options to selecting the options that are the most suitable for Tanzania. (See prior [feedback](#))
- Commitments to engagement in UN FCCC negotiations are welcomed, but such engagement should go beyond the issue of financing, and should be participatory.

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

- The KRA focuses on important elements of good *government* (specifically legal and institutional frameworks for REDD+) but does not address key elements of good *governance* (e.g., rule of law, transparency, accountability, participation). We recommend that:
 - Additional elements addressing good *governance* be incorporated; *or*
 - The KRA be re-named “Institutional and legal framework for REDD+ in place”, with the term “governance” incorporated into the title of a revised KRA 3, which could then include participation as well as other key elements of good governance.
- The Strategy and Action Plan rightly include focus on better securing community land tenure. We **encourage the Government to support actions and dedicate resources to turn studies into concrete action**, and to address tenure issues in safeguards, benefit sharing, and policy harmonization efforts. (Please also see comments above regarding interpretation of village vs. general lands and carbon ownership)
- We welcome recognition of safeguards in Goal 1 and the reference to subjecting policies to SEA/SESA.
- Goals and objectives could be better aligned.
- There is significant overlap with KRA 4, including on policy harmonization. However, conflict resolution (addressed to some extent under KRA 4) is an important governance issue absent from this KRA. Alignment between these two KRAs should be improved.

KRA 7: Training programme and Infrastructure for REDD+ developed

- This KRA could incorporate the training elements of all the other KRAs to avoid repetition.
- We welcome the clarification that training will be “for various stakeholders groups” (p38), but an explicit commitment to training for rural community members, including women,(as is included in KRAs 3 and 6) would still be helpful.

KRA 8: Current knowledge and scientific understanding of REDD+ issues improved through researches

- We welcome the removal of the listing of specific research topics, in line with previous [feedback](#).
- We recommend a commitment be made to building on existing research, e.g., CCIAM and pilot projects.
- We further recommend that the Strategy set out how lessons learned from this research will be incorporated into the evolving Strategy, policies and implementation.

KRA 9: An effective information and knowledge communication system on REDD+ issues developed

- We welcome the explicit commitment to disseminate REDD+ related information at all levels, and the development of a Zanzibar Environmental Education and Communication Strategy.
- We encourage multi-directional learning and information exchange, e.g., creating **opportunities for Government, communities, and other stakeholders to learn from one another**.
- We recommend that this KRA be removed as a standalone item and rather incorporated as an activity under each KRA, to respond to the different information requirements across REDD+ issues.

KRA 10: REDD+ strategy options for addressing drivers of D&D developed

- Given the critical role of drivers, we recommend adopting a more ambitious strategic objective geared towards *addressing* key drivers of deforestation, rather than simply “develop[ing] strategic options”.
- While we commend the NRTF for developing a comprehensive list, we recommend **streamlining and prioritizing the list of drivers and the potential interventions/ approaches to address them**. We recommend that the NRTF, in consultation with other stakeholders, narrow down the strategy to only **one or two strategic, actionable priorities** that will be the focus of initial implementation. Other interventions can then be added later so as not to dilute effort on the most important strategic initiatives. This selection process will need to be informed by **both estimates of carbon losses from different drivers of deforestation and expected emissions reductions that different interventions can deliver**.
- **Selected priority interventions should be explored in more depth, including with regard to their alignment with safeguards**, and building upon existing lessons, e.g. from PFM, the pilot REDD+ projects, and research findings.
- Regarding specific drivers and interventions that are mentioned in the current draft Strategy, whether they are included in the initial strategy or addressed at future dates, we feel the following should be considered:
 - We welcome the focus on creating awareness and strengthening land tenure among communities, and want to emphasize the importance of dedicated actions to strengthen land tenure, including by supporting poor communities in securing land titles and using them for their development.
 - Related to this, we welcome the commitments to scaling up PFM, including approving JFM cost-benefit sharing systems (p44). This will require action and dedicated resources within and outside of the REDD+ and forestry sectors.
 - Regarding invasive species (p46) the Strategy should deal not only with early warning against possible invasives, but also with invasives already established, e.g. pines across the Southern Highlands.

- Abject poverty is an overarching driver of D&D. We welcome the Action Plan’s mention of investments in the context of REDD+, and recommend that local investors and local community groups be given priority in such investments, coupled with measures to create an environment that supports their engagement.

KRA X: REDD+ social and environmental safeguards developed, implemented, monitored and enforced

We reiterate our previous [feedback](#) that the Strategy should have a dedicated KRA on safeguards, to include:

- inclusively developing nationally appropriate social and environmental safeguards, informed by the strongest international standards and safeguards;
- promoting accountability of all stakeholders in safeguards compliance;
- developing a monitoring and reporting system, linked with MRV and benefit sharing systems; and
- developing a grievance and redress mechanism for when safeguards are violated.

[We thank the NRTF for considering our feedback and recommendations.](#)

ⁱ Brazil, for example, has focused on the Amazon rainforest whilst largely ignoring its other forests.

ⁱⁱ See, for example, how MCDI estimated carbon losses in rural Kilwa.

ⁱⁱⁱ See prior [feedback](#) for a more detailed recommendation along these lines