

To

Institute of Resource Assessment (IRA)
Secretariat of the National REDD+ Task Force

Dear All,

The UNREDD-Tanzania Programme wishes to congratulate the National REDD Task Force (NRTF) for the release of the Draft National REDD+ Strategy. This is an important step in the development of a subject that could have a significant impact on the social and economic development of the country.

We wish to note that the UNREDD-Tanzania Programme has resources and a mandate to work with the MNRT and the NRTF to address a number of key result areas that the draft strategy has identified. This includes, in particular,

- Capacity-building at national, regional, district and local levels
- The development of an MRV system
- Stakeholder engagement and support of governance structures
- Awareness-raising measures for REDD+

The UNREDD-Tanzania Programme is looking forward to working with the NRTF in these as well as other areas. Our comments are structured as follows:

1. General comments on the draft strategy
2. Specific comments with reference to text in the draft strategy

Yours sincerely,

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1. General comments

Stakeholder engagement

The National REDD+ Strategy will only be 'national' if it has the full confidence and support of all stakeholders.

One way to obtain stakeholder support is by broadening participation in the National REDD Task Force (NRTF). While it was helpful to have a small team to initiate the process of developing the National REDD+ Strategy, the process for completing this task requires a broader basis. REDD+ is a very complex undertaking and without full stakeholder support implementation will be challenging or impossible. Many stakeholders will play a key role in addressing the drivers of deforestation and forest degradation in the country.

In order to fully address the complexity of REDD+, the NRTF should include additional Government bodies (e.g. Ministry of Agriculture and Food Security, Ministry of Energy and Resources, Ministry of Finance and Economic Affairs) as well as Civil Society representatives (including non-government organisations; the research community; forest-dependent, indigenous and local communities).

In order to facilitate stakeholder participation, it would also be very helpful if the NRTF could provide clear guidance and a timeframe on the process for finalising the National REDD+ Strategy:

- What are the next steps?
- When and where will workshops be held that offer opportunities for stakeholders to provide input?
- When will there be more opportunities to provide further written comments?

Stakeholders need time to prepare input and for many stakeholders time is also required to consult among each other. The time originally given for comments on the Draft National REDD+ Strategy was too short.

Furthermore, not all stakeholders have Internet access, in particular in rural areas. For future commenting opportunities, it may be necessary for the NRTF to identify key stakeholders and supply them with hard copies of important documents.

Costs and benefits and linkages with other policies

The strategy does not seem to have any cost estimates for implementation nor an estimate on the expected returns/benefits. It is vague on how the links with e.g. MKUKUTA and Kilimo Kwanza are to be operationalized.

As it is a REDD+ strategy it by definition focuses on REDD+ but it should not do this in a way that weakens its impact, e.g. it should focus on the multitude of ecosystem services and economic opportunities forests provide. This would help with attracting financing, e.g. from the national budget.

In general, one of the objectives of the strategy should be to mainstream the National REDD+ Strategy into national development planning. One instrument for mainstreaming could be a strategy for re-investment of REDD+ income.

The National REDD+ Strategy also provides an opportunity to integrate REDD+ with other areas of climate change, in particular the climate change adaptation sector. Forests play an important role in climate change adaptation, for example through their ability to store water. Another example is the protective function of forests, in particular in coastal areas where forests, e.g. mangroves, protect communities from impacts of storms and floods.

REDD+ as well as climate change adaptation attract significant resources from the international community and with sufficient integration, significant synergies could be developed between the various funds.

Since the Vice-President's Office (VPO) is party to the NRTF and is in charge of climate change adaptation within the Government of Tanzania, it should be easy to integrate these areas at Government level.

As a first step, VPO could for example ensure that any adaptation pilot projects get information about the potential benefits of REDD+.

Institutionalising REDD+ in Tanzania

Implementing REDD+ will require clear mandates for and close cooperation between a number of institutions and government bodies at the national level: the National Climate Change Steering Committee (NCCSC), the National Climate Change Technical Committee (NCCTC), the Ministry for Natural Resources and Tourism (MNRT) and its Forest and Beekeeping Division (FBD), the National Carbon Monitoring Centre (NCMC), possibly a National REDD+ Trust Fund.

The draft National REDD+ Strategy still is not clear enough in formulating the mandates of these institutions and how they will work together. A major concern is the fact that the NCCSC is inactive and it would be important to see how this issue will be addressed.

Furthermore, what a role will the newly created Tanzanian Forest Service (TFS) play in REDD+ development and implementation and how does this new body alter the role of the FBD?

Economic modelling

Reducing deforestation in Tanzania is inextricably linked to solutions for the country's energy sector. As mentioned by the Draft National REDD+ Strategy, 95% of Tanzania's energy needs are met by fuel wood. Energy requirements, on the other side, are a direct consequence of population growth and economic development.

The draft strategy acknowledges these linkages. In order to improve the understanding of these linkages the NRTF may wish to consider the development of a long-term economic model that brings together these components:

- Population growth
- Energy requirements
- Economic growth
- Forest development

A comprehensive model of this nature could assist in estimating the impact of policies and activities in the forest sector. Furthermore, and perhaps more importantly, this model could be used to forecast earnings from REDD+ activities which could help in the development and implementation of income distribution schemes.

2. Specific comments

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

- Strategic objective 2 should be amended to refer to a “participatory” national MRV system.
- Strategic objective 6 will operationalize NAFORMA. What does that mean given that the NAFORMA project is in the middle of implementation?
- It would be informative if the National REDD+ Strategy could spell out the relationship between the National Carbon Accounting System (NCAST) and the NAFORMA/MRV system?
- The methodology to quantify REDD+ and other forest benefits (Strategic Objective 3) should be more than that, it should be an integral part of the MRV system.

Key Result Area 2: Financial mechanisms and incentive schemes established

- This KRA should explore all options for the development of an investment portfolio for REDD+; in addition to the suggested REDD+ Trust Fund it should particularly explore ways to attract private sector investment for REDD+. This is important for the long-term sustainability of the strategy.

Key Result Area 3: “All stakeholders are engaged in the REDD+ implementation process”

- As mentioned before, one way to ensure that this objective will be achieved is by broadening participation in the NRTF. In order to fully address the complexity of REDD+, the NRTF should include additional Government bodies (e.g. Ministry of Agriculture and Food Security, Ministry of Energy and Resources, Ministry of Finance and Economic Affairs) as well as Civil Society

representatives (including non-government organisations; the research community; forest-dependent, indigenous and local communities).

- The Strategic Statement and Rationale specifically refers to the private sector and CSO. We suggest that forest-dependent communities and local communities should also be mentioned here.
- Goal 3 should be amended to read: “To support the informed and meaningful involvement of all stakeholders in the implementation of REDD+ schemes”.
- Stakeholders should also be enabled to contribute to the development of investment facilitation and support mechanisms.

Key result area 4: “All REDD+ schemes are well coordinated”

- Activities under this key result area include support for “existing and functioning conflict resolution mechanisms” without explaining which mechanisms these are.
- The UN-REDD Programme currently develops guidelines, on request from participating countries, on how to seek Free, Prior, and Informed Consent (FPIC) from communities and provide effective conflict resolution within the context of the UN-REDD Programme. We recommend applying these guidelines to REDD+ initiatives in Tanzania in general.
- A support system for a so-called ‘nested approach’ would assist in the coordination of REDD+ schemes.

Key Result Area 5: All fund based financing options are well understood

- It appears that this KRA could easily be merged with KRA 2

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

- Establishing a governance mechanism requires more than undertaking studies on legal and institutional frameworks. Even before such an activity it would be possible to outline some components and characteristics of a governance system that is to be established. For example: one goal could be to establish an inclusive and participatory governance system.
- It would be very valuable if the NRTF could provide some indication under this KRA of what it considers important with regard to governance for REDD+:
 - What are the objectives of a governance mechanism?
 - What characteristics should it have?

- What roles are envisaged for stakeholders, in particular communities; how will communities benefit from REDD+?
- What conflict resolution mechanisms will the governance system provide?
- Under this KRA it is suggested to undertake an “in-depth study on institutional and legal framework in the context of REDD+”. Several more activities refer to such reviews. How will these be different to the study on “Legal and institutional framework review in the context of REDD+ intervention” which the NRTF commissioned earlier and which is being discussed on page 19ff of the draft strategy?
- We recommend that further studies of legal and institutional frameworks focus on instruments in the natural resources management sector, aim to identify areas of possible conflict of legal instruments with REDD+, and map out strategies to circumvent those.

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

- Training schemes should take into account the possible links between REDD+ and other PES schemes and the possible combinations and synergies between climate change and biodiversity financing sources.

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

- It would be desirable if this KRA could outline how any new research programmes and institutions would build on and complement existing ones.
- The NRTF has initiated and is overseeing a four year research and training programme on Climate Change, Impacts, Adaptation and Mitigation in Tanzania (CCIAM), which is briefly referred to on page 45 of the draft strategy. CCIAM provides funding until 2013 and appears to address a number of the areas that are listed under Strategic Activities under this KRA.
- Any new research program on REDD+ should also aim to put REDD+ into a larger context such as the development of a low-carbon economy.