

Independent Technical Review: Bangladesh R-PP document

UN-REDD PROGRAMME

Reviewer: Martin Herold

Date: November 2013



General comments to R-PP Document of [Bangladesh] (maximum 200 words):

The presented draft R-PP emerged from the Bangladesh REDD+ Readiness Roadmap that was submitted in 2012. It was adjusted and complemented (Schedule and Budget, Programme Monitoring and Evaluation Framework) for compliance with the R-PP template. Its content remained largely similar/identical to the Roadmap and hence did not advance sufficiently to meet the standards of each component of the R-PP. That is not yet cause for serious concern, because today Bangladesh admittedly is just in the early stages of the preparatory phase, the first phase on the way to REDD+ Readiness. The R-PP largely replicates the content of the roadmap but needs further development to effectively support its implementation. Activities are predominantly focussed on assessments and studies and/or remain rather generic. Though generally comprehensive and considering a wide range of requirements, at present the document rarely proposes or discusses specific actions, instruments or options to advance REDD+ readiness in Bangladesh. The R-PP needs to provide more understanding on how the authors expect the intended activities to achieve the desired outcomes. Given the current baseline of mainly unknown factors (with respect to existing/required data, capacities, knowledge etc.), this point is actually comprehensible. That makes it all the more important to enhance the document continuously by adding more specific information and identifying high-priority activities to start with. In this context, early consultations with stakeholders will deserve as much commitment as the numerous envisaged assessments and may be a viable source of information and inspiration, especially by virtue of Bangladesh's vibrant NGO sector.

Assessing the draft R-PP against review criteria

(Please refer to the TORs and supporting documents)

1. Ownership of the Programme (maximum 150 words):

The draft R-PP was submitted and – presumably – formulated by the Forest Department. 1.6 million hectares of the total 2.6 million hectares of forest land area fall under the general management of the Forest Department that is the agency in charge under the Ministry of Environment and Forest (MoEF). Concerning other forest land not under the jurisdiction of the Forest Department (private ownership or administered by other governmental entities primarily by the Ministry of Agriculture), information on type, management and legal status is uncertain. Principle forest management strategies of the Forest Department are guided by the Forestry Sector Master Plan (1995) and the Forest Policy (1994) with the Forest Act (1927 and recent amendments) building the legal framework. Strengthening environmental stability and socio-economic development by means of forest resources have been recent priority issues. Especially the Forest Policy and the Forestry Sector Master Plan (1993) are directly relevant to (the plus part of) REDD+ by introducing a participatory approach into Bangladeshi forestry and sustainable development on the whole.

The National Steering Committee for Climate Change (NSCCC) chaired by the Ministry of Environment and Forests involves multiple relevant Ministries and representatives from civil society and the private sector. Coordinating all national climate change related actions the NSCCC is responsible concerning the international commitments of the country under the UNFCCC and for the development and implementation of the Bangladesh Climate Change Strategy and Action Plan (BCCASP). REDD+ integrates formally well into the existing policy framework. REDD+ will contribute to the objectives of BCCASP and the National Adaptation Programme of Action (NAPA) notably concerning afforestation/reforestation, capacity building, community involvement and sustainable management practices. With the BCCASP (2009) Bangladesh complemented its climate change strategy, formerly mainly focused on adaptation (NAPA, 2005), with a mitigation scheme. This is a reasonable vantage point in the context of REDD+ and multiple benefits as e.g. mangrove forests not only sequester carbon. They serve as a natural coastal protection (inundation, increasing salinity) and provide habitats for wildlife and livelihoods (i.a. fishery sector).

A REDD+ Steering Committee (RSC) was created in 2011 - similar to the NSCCC as an inter-ministerial focus point. The document admits, however, that a more widespread representation of non-government stakeholders (civil society, indigenous peoples' organizations, private sector) is expedient and that the participation of other concerned Ministries will become necessary. The RSC was put in charge of the Bangladesh REDD+ Roadmap development and supports the REDD+ Cell under the Forest Department with regard to coordination, management and general guidance.

In general terms national environmental and climate change strategies appear coherent to Bangladesh's REDD+ roadmap and co-financing through the Government of Bangladesh is further evidence for its ownership of the programme. This comes hardly surprising as the country is not only known as one of the most vulnerable countries to global warming (ranked 5th in the long term Global Climate Risk Index 1993-2012) but also for playing an active role in the international discourse on climate change since many years, warning of climatic impacts like rising sea levels and more frequent extreme weather conditions. This led Bangladesh to the objective of low-carbon development (BCCASP) and even to an amendment to the country's constitution in 2011 "to protect and improve the environment and to preserve and safeguard the natural resources, bio-diversity, wetlands, forests and wild life for the present and future citizens." On the other hand, a rather converse policy caused some stir recently for a specific reason, namely the Rampal power station that will be constructed near the edge of the Sundarbans, the world's largest mangrove forest. The

power station is a coal plant at 4 kilometres distance from the declared ecologically critical area. Whereas the project is certainly disputable and, with respect to the spirit of REDD+, clearly a negative example, it is at once a sign for a more fundamental conflict. Within the Power Sector Development Plan the Bangladesh Power Development Board (Ministry of Power, Energy and Mineral Resources) outlines the ambition to increase electricity generation capacity to 24,000 MW (2021) and 39,000 MW (2030) primarily based on coal (capacity Nov. 2013 – 10200 MW, 2.45% from coal). Coal is the most carbon-intensive fuel source and thus the power policy easily could foil all Bangladeshi efforts for emission reductions. This illustrates the importance to include analyses of all national strategies that may affect REDD+ and the necessity of dispute resolution mechanisms even on high governmental levels.

2. Level of consultation, participation and engagement (maximum 150 words):

Bangladesh organized workshops on the national and sub-national level. It is not quite clear how stakeholders were identified and how representative they are. National workshops focused its discussions on the technical profile of the REDD+ Readiness Roadmap for Bangladesh. However, sub-national consultations essentially did not debate REDD+ and instead were mainly employed to analyze “practical issues” “to provide constructive input”. By all means the sub-national workshops produced valuable output generating an initial analysis of drivers of deforestation and forest degradation and identifying potential measures to address them. According to the document, the REDD+ concept was not scheduled for presentation in worry of misunderstandings and counter-productive consultations given the low level of awareness and lack of understanding for the topic. This justification appears in some degree bizarre as the presentation of the REDD+ concept in fact is supposed to initiate and promote the awareness process. Relevant information on REDD+ should be disseminated in the run-up to the actual workshop meeting anyways, thus enabling stakeholders to absorb and meaningfully discuss the shared information. Bangladesh recognizes the need for awareness raising in Component 1c and will develop its strategy based on UN guidance (FPIC) and experience gained from a similar toolkit for Communication, Education and Public Awareness (CEPA) developed for the Convention on Biological Diversity that will be adapted to support the REDD+ programme. The document further recognizes the importance to make the REDD+ process inclusive and transparent to build trust among the stakeholders as a critical success factor.

The draft R-PP was endorsed during a recent national validation workshop (2 Nov 2013) by a multitude of stakeholders though the document was not shared with all of them in advance. Consultation and Participation Plan will be developed to facilitate public awareness raising and training for stakeholders on REDD+. So far it is evident that the process has just begun and there is not yet an institutional backing but Bangladesh envisages to enhance the existing structures and plans to establish a REDD+ Stakeholder Forum to allow for a better, more comprehensive representation of all stakeholders incorporating gender, compliance to FPIC principles and grievance redress. Methods and targeted arrangements are to be developed by the responsible Safeguards Technical Working Group.

For the preparation of the R-PP itself, it is unclear if there was any direct input from outside the Forest Department (i.e. apart from the recommendations and changes originating from the validation workshop), which is the only contact given with the document since an R-PP Development Team is not listed.

3. Programme effectiveness and cost efficiency (maximum 100 words):

The effectiveness of the programme will depend on the performance of selected activities. At present the proposal specifies rather general goals and intentions and to a large extent not yet portrays options how those objectives could be achieved. Whether the to-be-proposed activities will be effective for their part and ultimately lead REDD+ to success in Bangladesh, most notably will be subject to a careful implementation and completion of Phase I of the REDD+ readiness process.

Bangladesh will need to improve numerous preconditions to such an extent (awareness for REDD+, institutional capacities and collaboration, policies regarding tenure of land and forest resources, mechanisms for consultations of and feedback from stakeholders) that currently available information (given the status quo concerning existing national circumstances is still largely unknown) is not sufficient to assess the effectiveness and cost efficiency of the programme and its components. In general the budget distribution across the programme components appears reasonable. But for the reason of the unexplored status quo, the need for resources and effort putting a certain activity into practice to achieve a defined target may be highly uncertain today. Comments from the R-PP Validation Workshop already indicate that allocated budgets for several activities of Outcome 1 and 2 are supposed to fall short of the requirements.

Please notice that there are some quirks regarding the specified budget:

- There is an across-the-board increase of the summed-up Components budget of 7 percent labelled *Administrative Costs and Overheads* totaling to >1,000,000 USD. The administration of REDD+ is inherent to the design of the national REDD+ arrangements and must not be bolstered up with a lump-sum that is not transparently earmarked.
- No budget at all is allocated to the monitoring framework (Component 6).

4. Management of risks and likelihood of success (maximum 150 words):

The R-PP does not include a risk analysis framework or the intention to develop it under Component 2b as guidelines advise. The document consequently misses to specify potential risks associated with the presented Outcomes and Outputs within its Programme Monitoring and Evaluation Framework (Component 6, table 14). At present this appears inevitable, because essential assessments on national circumstances are still unsettled. However, the document lists a number of underlying causes in its preliminary driver analysis that may impede the implementation and success of REDD+ strategy options and must be addressed accordingly during the preparatory phase.

In general REDD+ related policies are supposed to be consistent to Bangladesh's integrated approach to e.g. tackle climate change (especially mitigation) or poverty reduction albeit weak governance, corruption, unclear tenure of land and forest resources, lack of awareness, coordination, law enforcement and insufficient capacity to monitor and address drivers and underlying causes today still encumber a sustainable implementation of actions. Thus, the reviewer is pleased that the document recognizes and aims to eliminate these deficiencies. Of course, Bangladesh still has to prove that it can develop adequate remedies. At present the activities mainly focus on assessments and less on specific ideas and (as a start - high priority) actions. To advance in this direction Bangladesh at first needs to establish coordination and collaboration at the institutional level with clear responsibilities and meaningful options of stakeholder participation. The coordinating entity does not only need the technical capacity to fulfil this task but also appropriate administrative power and political influence. In this context it is disputable whether the REDD+ Cell as subordinate of the Forest Department (and without any Non-FD-members) under the Ministry of Environment and Forests will be capable to cope with its crucial role of coordinating all REDD+

activities in Bangladesh in the current institutional setup. Disputes between conflicting policies and among stakeholders are inevitable and the R-PP should introduce proposals on how this is managed. There will be need for mechanisms from ministerial level as well as for stakeholders on the local level (grievance redress) and ideally they should be put in place as soon as joint consultations start.

5. Consistency with the UN-REDD Programme Strategy (maximum 150 words):

The R-PP demonstrates the required understanding and the will to develop its national REDD+ strategies consistent with the UN-REDD Programme Strategy. The document emphasizes repeatedly to acknowledge and follow the principles stated in UN-REDD guidelines. This intent may be reappraised once Bangladesh proposes specific actions to carry the designated objectives into effect.

6. Compliance with UN-REDD Programme Rules of Procedure and Operational Guidance (maximum 150 words):

The document in general follows the UN-REDD Programme Rules of Procedure and Operational Guidance. The draft R-PP was validated on a recent workshop by participants comprising central representatives incl. government agencies, civil society, indigenous people as well as UNDP and FAO staff. The minutes of this meeting were annexed and recommendations were included in the R-PP text (except of Outcome 3 – Output 1 – Activity 3.1.2 – Sub-activity iv, which is not coherent to the suggested change; possibly by mistake). Further initiatives and funding relevant to the national REDD+ programme that contribute to REDD+ readiness but are not covered directly through the R-PP are outlined (table 12).

The reviewer is not fully confident on how strictly the document should correspond to the R-PP form for the UN-REDD Programme. There are some deviations from the recommended format, notably:

- The R-PP development team is not specified. Only the Forest Department is supplied as contact. It is not clear if the R-PP was developed by the FD alone (maybe referred to as proxy for the REDD Cell, which is formally subordinate to the FD) or if there already was sort of collaboration with other agencies (i.e. apart from the workshops).
- Budget tables are not included after each component (but are detailed under Component 5)
- Extensive, yet general descriptions of common goals and measures considerably increase the size of the document. With a 150+ pages body and another 50+ pages annex the document clearly surpasses the recommended length of the body and total length of the R-PP (75/150 pages max.).

Suggestions for improving the technical design of the R-PP Document of [Bangladesh] (maximum 400 words):

The R-PP is still limited by today's weak data and capacity baseline for REDD+ in Bangladesh. Information on national circumstances that are essential to tailor effective activities is not available. Existing and required capacities still have to be determined, analyses of drivers of deforestation and forest degradation, of social and environmental risks and of REDD+ relevant policies at best have just been initiated. REDD+ strategy options must be selected according to the findings that can be derived from those surveys. The authors demonstrate awareness and understanding for the prerequisites of a successful implementation of REDD+ throughout the R-PP but not yet have the basis on hand to propose detailed and effective actions. Accordingly, at this time suggestions for improving the document unavoidably are just as much quite generic. General guidance and good practices are provided with guidelines from UN-REDD and other sources, also the FCPF R-PP template may be helpful to verify consistency, compliance to standards and the completeness of the evolving proposal.

The R-PP form is only optional for the UN Programme Document, but even if not mandatory through UN-REDD it will be advantageous to adhere to the template closely, both in form and content. To this effect propose your grievance redress mechanism in component 1a (not 1c) and consider to prioritize its development and implementation. It is beneficial to have it in place as early as possible, latest when the RSF will be operational.

As long as comprehensive, nation-wide assessments are not available, try to incorporate some lessons learned from projects into the R-PP to facilitate a more specific analysis and possibly guide early actions. Identify priorities in every respect (drivers, policies, areas, carbon pools, benefits, capacities...) where (no-regret) actions may be started and evaluated even before elaborate studies are finished. For example you may include lessons learned from community forest management where experience of favourable and unfavourable policies already was made and where apart from common findings (e.g. regarding unclear tenure rights or poor governance) possibly valuable insight into participation issues was gained (e.g. regarding equitable distribution of benefits).

The Programme Monitoring and Evaluation Framework (component 6) will considerably benefit when you succeed to establish a better interconnection between the components. The development of a risk analysis framework should be taken into account (component 2b) that could provide valuable input to component 6. It may even be worth considering to incorporate compliance to the budget (as detailed in component 5), particularly with respect to the uncertainties regarding capacity building needs that are subject to still undefined REDD+ actions and strategy decisions. Referring to interconnections between components, there is also room for improvement between component 2a (drivers), 2b (strategy options), 3 (REL/RL) and 4 (MRV) (REDD+ activity performance, monitoring of drivers). For instance the R-PP proposes a real time fire monitoring system but forest fires are not mentioned as a driver for deforestation/forest degradation in Bangladesh. Attention to the strong interconnection of the R-PP components favours your effort to safeguard the consistency of the document.

The preliminary analysis of drivers and underlying causes in component 2a supposedly emerged from the reasonable initial attempt at the sub-national stakeholder workshops. Please notice that the R-PP entirely mixed up direct drivers and underlying causes within the supplied tables. The separation into drivers 'Within the forestry sector' and 'Outside the forestry sector' does not appear clear, especially considering the complex context and the implications to incentives/disincentives regarding policies, legal framework, law

enforcement and governance. It is good practice to separate drivers (and underlying causes) in terms of deforestation (on the one hand) and forest degradation (on the other hand). The regional differentiation however is reasonable.

Levels of awareness for REDD+ in Bangladesh will need to be substantially raised among all stakeholders without creating unrealistic expectations. To start a dialogue of the REDD+ process, the R-PP should also be distributed widely. As noted in the comments of the validation workshop a feedback mechanism is needed and should be established early to build trust among the stakeholders and further improve the performance of the REDD+ programme.