

# Independent Technical Review: Bangladesh R-PP document

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UN-REDD PROGRAMME

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## **General comments to R-PP Document of Bangladesh:**

One of the most densely populated countries with approximately 80 percent of land mass seriously affected due to flash floods in monsoon season and increasingly depleting forest resources, Bangladesh sustains highest level of vulnerability from climate change perspectives. The R-PP documents 2.6 million ha of forest (18% of the total land mass) land and another 2.5 million ha under “other wooded land” in Bangladesh. Since early 1990’s, Bangladesh has pursued a policy of engaging with local forest dependent communities for rehabilitation and restoration of forests under the social forestry schemes. This justifies country’s interest and engagement in REDD+.

This R-PP builds on a comprehensive review and analysis of existing national development policies, strategies, plans and programmes of Bangladesh. Special emphasis has been given to internalizing the underlying causes of depleting forest resources, increasing environmental and climate change induced vulnerabilities, frequent natural disasters and increasing challenges for combating poverty.

This R-PP is considered to be a comprehensive programme document prepared based on extensive research, review and analysis and adequate stakeholder consultation across the sectors and levels. It comprises all components and elements that need to be covered as per the UN-REDD Programme Strategy. It has followed relevant and necessary processes set under the UN-REDD Programme Rules of Procedure and Operational Guidance.

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## Assessing the draft R-PP against review criteria

(Please refer to the TORs and supporting documents)

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

Bangladesh is implementing its sixth Five-Year Plan (2011-015) which is environmentally benign and responsive to the foreseen Climate change impacts. The plan strives to accelerate country's economic growth and reduce poverty. A ten –year Bangladesh Climate Change Strategy and Action Plan (BCCAP) 009-018 is also being implemented with support from International development partners. Additionally, a forestry sector master plan, 1994 is also being implemented which pursues a policy of engaging with people for rehabilitation, restoration and enhancement of forest through social forestry approaches. Efforts for restoration of degraded forests and other vulnerable areas has gained momentum since 1980's in Bangladesh.

The proposed R-PP builds on these existing policies, strategies, plans and programmes of the Government of Bangladesh (GoB) and fits well with the projects being implemented under assistance from international development. The R-PP takes into account the existing baseline funding. The GoB has expressed its commitment for in-kind co-financing of approximately 20% of the total fund required for the implementation of this R-PP over a three year period. These represent an evidence of the government ownership of the R-PP.

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

In course of the development of its REDD+ road map, GoB organized three national level consultations between October, 2011 and March, 2012. Over this period, a number of working group meetings and sub-national consultations were also held to inform the stakeholders, seek their views and perspectives and clarify the road map. An R-PP validation workshop was organized on 2<sup>nd</sup> November, 2013. About 120 representatives from all relevant stakeholder groups participated and commented on the R-PP. The R-PP was revised and finalized based on the comments and feedbacks received in the validation workshop. The minutes of the national R-PP validation workshop shows the participation and engagement of the representatives of the civil society and indigenous peoples' (IPs) organizations.

Participation in consultation meetings ranges from the representatives of the relevant government sectors, international development agencies, programmes, projects to relevant academia and research institutions, national/international NGOs and CSOs and Indigenous Peoples' organizations as and where appropriate. The R-PP has noted that the practice of multi-sector/multi-stakeholder and multi-level dialogues and consultations especially aimed at national policies and strategies formulation is relatively new to Bangladesh. And the process of R-PP formulation followed a bottom-up, all-inclusive approach and engaged as many stakeholders as possible at multiple levels.

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

Building on the specific context of Bangladesh, the R-PP has followed a logical approach to programme development making the programme fairly comprehensive. Planned activities under each component are logically sequential and in line with component outputs. R-PP expresses its commitment to engaging all relevant stakeholders in the implementation of specific activities which further ensures the programme effectiveness.

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Cost efficiency, to a larger extent hinges on a range of parameters including efficiency in implementation planning, coordination and human resource mobilization. Considering the construct of the strategies, approaches and work plan proposed for the programme delivery, a satisfactory level of cost efficiency could be anticipated.

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

Major risks involved in the R-PP implementation are i) securing effective coordination among multi-sector/multi-stakeholders at multiple levels and ii) ensuring fair representation and engagement of non-government stakeholders including CSOs, IPs', local natural resource management groups, women, other marginalized interest groups and private sector in the implementation of R-PP. The R-PP has proposed a management structure that is widely discussed and agreed among all relevant stakeholders for achieving effective coordination. Terms of reference for all relevant sectors/stakeholders including the mechanism for institutional interaction among them proposed in the R-PP will be instrumental in the management of risks. Additionally i) a consultation and participation plan is to be prepared and implemented; ii) a REDD+ stakeholder forum (RSF) will be constituted and operationalized which will be instrumental in ensuring fair representation of relevant stakeholder entities in the REDD+ Steering Committee (RSC) and Technical Working Groups (TWGs); iii) national guidelines for FPIC will be developed, field tested and executed and iv) a REDD+ grievance mechanism will also be put in place after field testing. These proposed activities promise appropriate and timely management of risks and enhance the likelihood of R-PP achieving its outputs. Awareness and capacity building activities hopefully will target at the social elites and politicians as well at multiple levels which will be instrumental for consensus building and gaining political support to the programme.

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

The UN-REDD Programme strategy emphasizes on a process oriented approach that moves with meaningful stakeholder participation and an on-going FPIC at each and every stage of readiness preparation. Planned dialogues and consultations should enable people reflect on the environmental and social costs and benefits of reclaiming and restoring forests and the opportunity costs and benefits to those involved in doing so, and especially the IPs, poor forest dependents and women. The R-PP has made possible efforts to internalize these elements in to the work plan.

The R-PP management structure, the cross-sectoral participation in R-PP formulation process, importance given to the composition and functioning of TWGs and RSF, FPIC and dispute resolution – all provide an indication that the R-PP is developed within the context of national policies, remains country owned and stakeholder driven, and will follow an iterative process with monitoring and refinements as required during its implementation.

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

A consultative process was adopted to prepare the R-PP. Existing evidences show that three national workshops and many regional workshops were organized in a planned manner to create awareness on REDD+ and to document the underlying causes of deforestation and degradation of forests from diverse stakeholder perspectives. Information generated and the stakeholder concerns and interests exhibited in these consultations formed the basis for the REDD+ Steering Committee to draft the R-

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PP. The draft R-PP was presented in the Validation workshop participated by 120 representatives from UN organizations, national/international development partners, relevant government sectors, NGOs, CSOs, Indigenous Peoples organizations and natural resource management communities, private sector and media. The draft R-PP was further refined incorporating the comments and suggestions. The process followed provides enough justification indicating the compliance of the R-PP with the UN-REDD Programme Rules of Procedure and Operational Guidance.

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## Assessing the draft R-PP by component

(Please refer to the TORs and supporting documents)

### 1. Component 1: Organize and consult (maximum 300 words):

Organized in three distinct sections, this component elaborates a national REDD+ management arrangement (1a), information sharing and early dialogue with key stakeholders groups (1b) and consultation and participation process (1c). For each section, objectives/outputs are justified in line with existing country context; an account of existing policy, institutional and operational environments is presented to justify the opportunities and constraints facing readiness preparation. And a work plan including activities and estimated budget is presented.

Under 1a) an analysis of the institutions dealing with climate change, environment and natural resource related issues e.g., NSCCC, NEC, CCNWG, CCT, MoEF, DoE, FD, and CCC is presented with their potential roles in REDD+. Also reviewed is the works undertaken by the pre-existing REDD institutions e.g. REDD steering committee, technical committee and technical working groups with focus on their relative strengths and weaknesses. Building on a common understanding of the gaps in existing management structures and arrangements, refinement has been proposed for composition and functioning of RSC, TWGs, REDD cell. The composition and role of a REDD Stakeholder Forum (RSF) has been proposed. A sharp overlap in the roles being played by institutions e.g., NSCCC, CCNWG, CCT and CCC in the MoEF can be noticed which probably will get attention for adjustment in course of the R-PP implementation.

Under 1b), it gives an account of the efforts made for early dialogue and information sharing. It mentions a stakeholder mapping exercise that identified six categories of stakeholders to be consulted comprehensively during R-PP implementation; national and sub- national consultations organized during the formulation of R-PP concluded that there exists limited REDD related awareness amongst stakeholder groups especially at district and local levels.

Accordingly, under 1c) the R-PP aims at achieving a thorough, effective and constructive participation of all stakeholder groups focusing on awareness, knowledge and capacity strengthening approaches and activities. The work plan comprises i) development and implementation of an awareness raising strategy, ii) enhancing consultation and participation, iii) operationalizing compliance with FPIC principles and iv) putting in place a grievance mechanism.

### 2. Component 2: Prepare the REDD-plus Strategy (maximum 300 words):

Elaborated under four sections, this component aims at developing a national REDD+ strategy. Section 2a) provides an assessment of land use, land use change drivers, forest policy and governance. Findings of the assessment of existing REDD relevant policies, strategies and legal frameworks indicate i) prevailing gaps in decentralization, community management of resources and specific REDD+ measures (however without any mention of the nature of such gaps); ii) cross-sectoral inconsistencies and overlaps both at nation and local levels and iii) difficulties in implementing policies and enforcing regulations. The R-PP proposes further in-depth assessment of relevant sectoral policies, strategies and legal frameworks from the perspectives of REDD+. Underlying rationale include i) elimination of conflicting provisions and overlaps and harmonizing them to support REDD+ actions and ii) developing better understanding of co-management,

governance mechanism, land tenure and customary rights, usufruct rights and benefit sharing arrangements specially in CHT area.

While the on-going deforestation and forest degradation in Bangladesh are both natural and human, their patterns and causes are diverse across the five broad categories of forest types. The R-PP presents a preliminary analysis of direct and indirect drivers of deforestation and forest degradation for each broad vegetation categories including their underlying causes based on the findings of the sub-national consultations and supported by review of secondary sources. Accordingly, activities have been proposed for further probing in to, the drivers and their underlying causes.

Under 2b), the R-PP details out how the country would address the drivers of deforestation and degradation of forests. A preliminary analysis of the strategic options for addressing the underlying causes of drivers across different vegetation categories have been presented based on the findings of the five previously undertaken sub-national consultations. Based on the findings of the proposed activities under 2a, this analysis will further refined, then categorized into three categories e.g., i) policy based measures, ii) strengthening of local governance mechanism and iii) support for locally specific activity packages. Strategic options under all three categories will be prioritized as per the site specific conditions .

Section 2c) should ideally be attributed to elaboration of institutional arrangements and key issues relevant to REDD+ implementation. The R-PP seems to have left behind some relevant issues related to e.g. land ownership and tenure, customary land rights and forest use rights moving further to carbon rights all of which will likely have negative implications for effective implementation of REDD+ strategy.

Building on the existing social and environmental safeguards within the country, the R-PP further commits to assessing them in the light of REDD+ strategic options and developing an ESMF to be implemented.

3. Component 3: Develop a National Forest Reference Emission Level and/or a Forest Reference Level (maximum 200 words):

Bangladesh sustains lack of national level data on forest cover changes over time the only land use assessment existing being the FAO 2007. Some sub-national level land use data are available but most of them do not fit into the national level statistics. Based on an analysis of existing UNFCCC provisions of REL/RL, the R-PP proposes to undertake studies and analysis of national circumstances, collect data, improve the approach and work on national or as an interim measure sub-national REL/RL in the REDD+ implementation stages. The R-PP proposes a set of activities around three outputs e.g., i) capacities for development of REL/RL, ii) national circumstances and historical data and iii) field testing of REL/RL. Activities include capacity needs assessment and capacity development, assessment of national circumstances, historical assessment of drivers, data collection to support REL/RL and many more. Changes in outputs and activities are likely with the learning accumulated in course of implementing these activities and moving towards setting up REL/RL at national or sub-national level.

4. Component 4: Design Systems for National Forest Monitoring and Information on Safeguards (maximum 300 words):

An MRV action plan prepared in early 2012 is being implemented since April 2012 with targeted technical support from FAO. It focuses on capacity building, land cover classification and GHG

inventory preparation for LULUCF. It has plans to initiating the harmonization of land use/land cover maps. The R-PP realizes the significance of three building blocks of national forest monitoring system namely i) SLMS to collect and assess the activity data, ii) national forest inventory to collect data on forest carbon changes required for estimation of emissions and removals and iii) a national GHG inventory as a tool for reporting on forest based GHG emissions by sources and removals by sinks. Accordingly, it identifies six outputs to be achieved to establish and operationalize a full-fledged M and MRV system. They are: i) capacities for forestry sector GHG inventory strengthened, ii) national satellite based forest monitoring system established, iii) NFI designed, iv) scientific research on key issues enhanced, v) MRV implementation support facility and vi) integrated forest information system designed and supported. A set of activities under each output has been proposed for implementation over the readiness preparation period. The R-PP covers phase 1 and part of phase 2 under which result based demonstration activities will be implemented.

So far, there has not been any national level periodic forest inventory arrangement within the Forest Department of MoEF. GHG emission estimates included in the national communication reports to UNFCCC from DoE depended on data compiled from secondary sources. Under the readiness preparation, an institutional arrangement for the establishment and operationalization of a national forest information management system and M and MRV system has been proposed. Accordingly, under the coordination of REDD+ Cell, establishment of a NFI Unit in the Forest Department is proposed for the NFMS management and forest carbon change assessment. The already existing RIMS unit in the FD will be strengthened to undertake periodic forest area change monitoring and generate activity data. Within the existing institutional set up and limitations, the strategy and approach proposed for setting up the M and MRV system in the R-PP looks relevant.

5. Component 5: Schedule and Budget (maximum 300 words):

Over the three years period of implementation of this R-PP in phase 1, Bangladesh anticipates to put in place i) a REDD+ management structure and process, ii) develop and finalize its national REDD+ strategy and iii) develop required capacity at different levels and among stakeholders to embark on the implementation of REDD+ in phase 2. The proposed schedule also emphasizes on linking the R-PP implementation with that of the Country's national CC mitigation strategy and coastal areas climate change adaptation strategy.

Approximately 60% (USD 9.19 million) of the total estimated budget of 15.62 m USD is claimed as secured and coming from UN-REDD, government co-financing (in-kind) and USAID (yet to be confirmed). The R-PP anticipates that the remaining 40% fund (USD 6.42 million) will be mobilized through parallel sources, most of which it claims, are already identified.

Projects being implemented and/or in pipeline with funding support from USAID, EU and the World Bank, UNDP and GIZ including the Bangladesh Climate Change Resilience Fund (BCCRF) are identified as the key parallel sources. USAID assistance in the implementation of a capacity development for MoEF is likely to contribute in implementation of sections 1a, 1c and 2b of the R-PP. The R-PP estimates that almost one-third of a USAID funded USD 36 million project- climate resilient ecosystems and livelihoods (CREL) focuses on forests/NRM is likely to contribute significantly to the implementation of R-PP. The World Bank, EU and BCCRF funded projects are also likely to significantly contribute in the implementation of R-PP particularly to its components 1, 2, 3 and 4, however they are yet to confirmed.

Little over 50% of the total estimated budget for the R-PP implementation is allocated for M and MRV system development in component 4. This probably is justified given Bangladesh needs to start

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from an initial stage as regards the national forest inventory and forest resources and GHG assessment system. Establishing a robust M and MRV system (component 4) largely hinges on a down to earth and realistic setting up of REL/RL (component 3). Given these two components build on each other, REL/RL is likely to benefit from budget allocated for MRV system.

6. Component 6: Design a Programme Monitoring and Evaluation Framework (maximum 300 words):

The R-PP presents a detailed programme monitoring and evaluation framework in a standard format. It provides indicators, baseline, targets, means of verification, data collection methods and associated risks and assumptions. It commits for every six monthly internal tracking of progress and correction of likely divergence. An independent final evaluation is planned around the end of year 3 of the 3 year R-PP implementation, which will assess the achievements and document the lessons learned.

Baseline data/information has been adequately presented. Target indicators are adequately specific and time bound. Means of verification for the performance against indicators are have adequately been defined in most cases. Data collection method against most monitoring activities is mentioned though time frame and/or frequency of data collection remain missing. Which agency/individual will be responsible for implementing and/or overseeing the specific activities of the monitoring framework remains if mentioned will have added value to the monitoring and evaluation framework.

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

This R-PP has been prepared based on comprehensive review and analysis of the policies, strategies, plans and programs of Bangladesh including the outstanding socio-economic and environmental issues the country is exposed to. It is also based on the extensive consultation with diverse range of stakeholders including policy experts, researchers, development professionals in government, non-government, civil society and indigenous peoples' organizations, resource managers at local level, vulnerable, poor and women in the societies. Technical the design of the R-PP is relevant to the country context in general and is likely to improve further as experiences and learning is accumulated with pursuance of the REDD+ initiatives. However, some suggestions are presented here for consideration in due course of programme implementation.

Roles and functions of two or more organizations located in the same or different development sectors and related to natural resources, environmental or climate change aspects is often likely to result in overlapping and/or conflicting claims and jurisdictions. Under such circumstances policy provisions, legal/institutional and operational arrangements contradict and rarely enable sustainable management and development. In this context, the mandates, functions and policy and operational environment under which the institutions e.g., NSCCC, CCNWG, CCT and CCC of MoEF in Bangladesh operate need scrutiny under the component 1.

The R-PP under component 2 c needs to elaborate on key issues involved in REDD+ implementation, and to explore potential arrangements to address them. Such key issues could be for instance i) assessment of land ownership and carbon rights, ii) addressing key governance concerns related to REDD+. The R-PP has not adequately covered the assessment of existing situation of land ownership, forest use rights and governance mechanism in community managed forest areas in Bangladesh. It is therefore suggest to consider reviewing these aspects including possible scenario of carbon rights under different forest and land management regimes with potential for forest restoration.

Setting up REL/RL and establishing M and MRV system are closely interlinked. In this R-PP this inter-links seems inadequately captured. Consequently, they are elaborated as stand-alone components. It would add value if this strategic linkage between these two components are adequately captured and the activity plans are elaborated accordingly.