

Independent Technical Review: Bangladesh R-PP document

UN-REDD PROGRAMME

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

The draft R-PP document draws a picture of a vibrant REDD+ environment in Bangladesh with a multitude of ongoing processes and agencies that are already involved or considering to get involved. It also draws up an ambitious plan for the government to engage with a diverse set of stakeholders at many different levels.

The review of the R-PP Document of Bangladesh delivered a set of key observations around the rationale behind a strategic focus on the local level and participatory processes, around the complexity of proposed programme management, and around the level of detail in programme planning.

It is recommended to revise the R-PP before reaching a decision on UN-REDD's engagement on its basis.

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 R-PP draws a picture of a dynamic environment in the country with a multitude of initiatives that all work together to contribute to readiness for REDD+ (list of initiatives in Table 12). With so many ongoing initiatives it seems that there is fertile ground for UN-REDD to also engage.

It is also encouraging that the government of Bangladesh commits to co-funding almost US\$3 Million (Table 12). Given that this co-funding is in-kind more detail is required and only with a detailed breakdown of what exactly the in-kind co-funding consists of can its significance be understood.

Doubts arise, however, regarding the government's coordination capability between initiatives (answer to review criterion 2), the alignment of initiatives, and the alignment between components (answer to review criteria 2 and 3). There are also doubts regarding the extent to which the suggested consultation procedures for programme implementation are based within the national context (answer to component 1).

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

The R-PP does not yet provide full confidence in effective government coordination. Fully effective coordination would give each ongoing initiative distinct roles that together form a coherent readiness strategy. Rather than such an effective role definition, there are indications that the related initiatives overlap (Table 11 shows for each of the R-PP's outcomes that several agencies are involved). Also, there are indications that significant gaps remain in the current set of ongoing and planned initiatives (Table 11 lists for every single outcome a significant financing gap).

Bundling together a set of initiatives through linking their budgets and their activity frames without a fully effective coordination introduces risk. The R-PP broadly integrates the workplan, budget and reporting with those of US-AID, the World Bank, the GIZ etc. This makes the success of UN-REDD's engagement dependent on the success of these others. Also, it creates a the need for coordination of workplan, budget and reporting. This is worrying because most of these initiatives are not yet confirmed (Table on page 14).

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

The likely effectiveness and cost efficiency of the programme will depend, among other things on how well its individual components are planned out and how well they align with each other.

It creates doubt about the likely effectiveness of the programme that the planning of activities, schedule and budget falls short of expectations. Many budget items are very general and there is little detail regarding cost categories (answer on component 5).

An imperfect alignment between the components also calls the likely programme effectiveness into question. The text looks in places as if he had been prepared by different persons and then pasted together (formatting and structure of the text). Moreover, in places it seems as if there was duplication between components (answer to component 3). While a team effort is of course desirable coherence needs to be achieved.

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

In its current form the R-PP does not have a detailed risk assessment. Such an assessment would list risks that either relate to specific outputs and outcomes or also to the larger environment. It would provide details on the likelihood and the impact of the individual risks. There would be information on to which extent the programme can manage the risks (answer to component 6).

The likelihood of success of the programme is very hard to assess with a risk assessment all but absent from the R-PP. Several particular risk factors are addressed in other parts of this review (e.g., risk of insufficient M&E framework (answer to component 6), risk of insufficient alignment between donors (answer to review criterion 2). All of these ultimately jeopardize programme success.

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

The R-PP seems to be largely consistent with the standards provided in boxes throughout the text.

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

This review did not assess the R-PP against the UN-REDD Programme Rules of Procedure and Operational Guidance.

Assessing the draft R-PP by component

(Please refer to the TORs and supporting documents)

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

The sections with the description of national readiness management arrangements and the section on information sharing and stakeholder groups contain a detailed description of envisioned arrangements. From the superficial analysis that analysis of the R-PP allows, it seems that there is a good existing level of ownership and communication.

The section on consultation and participation processes includes several underlying assumptions about how REDD+ will integrate with other government's planning process in the country. This is relevant regarding the awareness raising, regarding FPIC and also regarding grievances.

The universal reference to FPIC and state-of-the-art grievance mechanisms as governance tools for the planning of REDD+ actions surprises. The government and the civil society so far only have limited experience with participatory processes (see page 62 on limited availability of existing grievance mechanisms and page 43 on institutional capacity to deal with multi-stakeholder processes). The procedures around planning and implementation of REDD+ measures in phases 2 and 3 need to be set up in a way that government and civil society can handle them. Introducing governance tools that are out of context with common practice creates a risk of lack of ownership or a disconnect with other national processes.

Along the same lines, a highly expensive awareness raising campaign all the way down to the grassroot level (output 1c1) seems to be of doubtful use. Rather than focusing on the local level, REDD+ could also be thought of as an international financing mechanism for national policy development and implementation. Grassroot-level awareness would then be as unnecessary as it is for, e.g., the GEF or the WTO negotiations. Rather than about international REDD+ itself, awareness raising should focus on the national policies and measures that it bankrolls as part of consultation on specific REDD+ actions in phases 2 and 3.

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

For component 2, the proposed budget allocation does not provide confidence that the activities are fully thought through. Although the bulk of the funding to be spent goes in component 2c1 (US\$1.7 Million), the description of planned activities could be more detailed (page 91 lists only generic steps of capacity development for the REDD+ cell). The description of activities under 2c2 and 2c3, in turn, are sound but the budget is too small (US\$100,000 each).

Overall, the R-PP does not lay out why REDD+ planning and implementation should focus so much on the local level. There are other countries where the central government drives mitigation, aiming to integrate REDD+ in a cross-sectoral agenda of low-carbon development. Such linkages are not prominent in the description of component 2. It deserves strategic consideration why Bangladesh suggests to go a different direction and focus REDD+ on the local level with small cross-sectoral linkages.

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

The description of component 3 creates confidence in its technical soundness. Questions remain regarding institutional and management aspects and how component 3 plays together with components 2 and 4.

Regarding institutional and management aspects, it is not clear to which extent the work on the reference levels under component 3 would be integrated with work on the national forest monitoring system under component 4. These workpackages can easily overlap because of similar databases and approaches required and some countries create integrated units tackling both. The R-PP does not address how the institutional and management structure will be set up but describes components 3 and 4 as if they were separate projects.

Moreover, it is recommended to explain the rationale behind opting for a complex process for the highly technical task of reference level development. Rather than working with subnational reference levels and consultation processes, reference levels could also be developed centrally (e.g., at the MRV Implementation Support Facility? – see answer to component 4). Rather than suggesting broad capacity building activities, training could focus only on the staff to be involved in development of reference levels.

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

The description of activities and outputs under component 4 is sound and provides much confidence in its viability.

It surprises that the section on the MRV Support Facility is empty. Several countries have set up such facilities to coordinate the technical aspects of M&MRV including the reference levels (see answer to component 3), which makes sure that data are handled centrally and provides for coherence of monitoring with reference levels.

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

The document does not currently contain a schedule of activities that could be assessed. Information on the timeframe of activity implementation is available in Table 14 only, but cannot be assessed as such. (The field in Table 14 would be better used to elaborate on indicators, their target levels and expected timeframe rather than on activities.)

There is not currently a uniform level of detail between budget lines. In places, individual budget lines show an unnecessary level of detail that does not increase transparency, but restricts the flexibility in implementation (e.g., there are several items as small as US\$5000). In other places, very large sums are allocated without any further description (e.g., US\$3.5 Million to “establish a NFI”) or descriptions of budget lines are too general (e.g., outcome 4 has “technical capacity building for the GHG inventory for LULUCF”, “strengthening forest inventory capability of stakeholders”, “strength

spatial modeling expertise”). Such very broad budget lines reduce transparency and could hardly be basis for evaluation of funds management.

The budget does not currently break down expenditure as would be expected. Firstly, there is no breakdown available by the source of funding (i.e., where the individual donors listed in Table 12 come in at the level of individual budget lines). This makes risk assessments difficult (answer to review criterion 4). Secondly, there is no breakdown by the categories of spending (e.g., travel costs, staff costs, workshops costs, etc.). This makes assessing the efficiency of spending difficult.

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

The R-PP’s M&E framework should follow the principles of results-based management. Albeit using a relevant template the logical framework is not fully developed. The activity plan reads more like it was designed around the activities to be carried out than around a logical results chain. The activities are grouped together for outcomes and mostly there are cursorily risks addressed but overall these do not currently have a convincing logical structure. The document reads like squeezing an activity-focused workplan into a log-frame template.

More specifically, several shortcomings of the logical framework were observed. The description of work in the components across the document should elaborate in detail on how the levels of the results-chain connect to each other. Activities need to be defined to logically lead up to the outputs. Outputs, in turn, lead up to outcomes. These connections are very hard to follow in the current draft. The programme’s key strategic choices need to be encapsulated there, e.g., regarding the focus on the local level. It is necessary to make cause-effect hypotheses explicit across the document and also to give much more attention to risks (see many gaps and generic descriptions in Table 14, see answer to review criterion 4).

Indicators are not uniformly defined across all components (e.g., for output 1a pages 42 and 144 refer under activity 14 to a “policy statement” and page 153 refers to a “decree”, which can have different meanings) and in places are missing altogether (e.g., outputs 4a4-4a6 in Table 14). It is understood that in complex programs it may be more practical to fix some indicators and their baselines during project inception only, but then such planned work on stepwise development of indicators needs to be laid out.

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

From the review of the R-PP Document the following three key points emerged:

The R-PP’s strategic focus on a local-level and participatory process is not sufficiently explained. The R-PP contains a vision of a national REDD+ process that would develop at the local level and is immensely participatory. This is made most explicit in component 4c, on page 90, first paragraph of sub-section 4 “For REDD+ to work, ...”. There would be broad grassroot-level awareness raising and usage of FPIC (component 1). REDD+ actions will be planned and implemented at the local level, resources would be managed at the local level and funding channeled through to forest users (component 2). Correspondingly, reference levels would be dealt with through broad capacity

building at the subnational level (component 3). (Component 4 is mostly national level, however.) This focus on the local level is an important strategic choice that the R-PP does not sufficiently justify (answer to component 2), or integrate in its M&E framework (answer to component 6). Neither is sufficiently clear from the R-PP whether such a participatory approach is not out of touch with current reality (answer to component 1) and hence creates the risk of insufficient government ownership and limited alignment with general government procedures (answer to review criterion 1).

The R-PP's suggested 85% co-funding seems to introduce unnecessary programme management complexity. The budget includes activities for a US\$15.6 Million to request funding of US\$2.3 Million. This setup seems risky because most of the co-funding is not yet secured, because the UN-REDD programme's success will largely depend on other agencies' activities, and because there are many overlaps between activities of several agencies (answers to review criteria 2 and 3). It seems that the R-PP's structure is more complex than it should be.

The programme planning contained in the R-PP seems to not yet be fully developed. In place the description of activities is generic (answer to component 2). For some activities it is hard to establish correspondence with allocated budget (answer to component 2). Not in all cases are the sections fully consistent with each other (answer to component 3). There is no time schedule available (answer to component 5). The risk assessment framework is missing (answer to review criterion 4). The R-PP does not yet fully adhere to the principles of results-based management (answer to component 6). More effort would need to be dedicated to planning.