

Independent Technical Review: Sri Lanka National Programme Document

UN-REDD PROGRAMME

Reviewer: Martin Herold

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General comments to National Programme Document of Sri Lanka:

The draft R-PP of Sri Lanka provides in substantial proportions rather general information reflecting known requirements and good practice for REDD+ that don't add much content for the purpose of the R-PP for a specific country case. Essential parts of the R-PP components only marginally present details on country specific analyses, strategies and actions. The draft document rather identifies a comprehensive to-do list, thoroughly describing the steps lying ahead – in a generic fashion mostly without discussing and assessing viable options, specific actions or possible instruments.

Nevertheless, the document is definitely valuable as it elaborates a reasonable schedule for REDD+ readiness efforts that demonstrate awareness and understanding for the key elements of REDD+. A meaningful REDD+ strategy should e.g. account for the occurrence and impact of drivers of deforestation and forest degradation, for available data and capacity as well as for data and capacity gaps, it should consider experience/lessons learnt and conflicts of interest between diverse REDD+ and other objectives of the national development strategy. Sri Lanka's draft document inevitably does not meet the standards set up by the R-PP format since much of these basic prerequisites are yet to be created (before specific actions can be elected/appraised). Without the knowledge of national capabilities and without suitable datasets to analyse, it is evident that the recent draft R-PP cannot yet frame a fully-fledged proposal of national REDD+ strategy options and activities as this will not become possible until these fundamental gaps are closed. In turn, both a monitoring system and policy actions that are designed along to-be-selected options of the REDD+ strategy are not (cannot be) presented.

Assessing the National Programme Document against review criteria

(Please refer to the TORs and supporting documents)

1. Ownership of the Programme:

The UN-REDD National Programme Document omits (assumedly by mistake) to name its author. The corresponding template page of the R-PP (“General Information”) that lists authors and contributors was missing. To the best of the reviewer’s knowledge the document was prepared by the Forest Department (FD) of the Ministry of Environment of Sri Lanka. In absence of any institutional REDD+ entity the FD was so far also in charge of organizing consultations with stakeholders. Resorting to previous environmental projects facilitated a comprehensive stakeholder mapping/analysis to support the preparations of the R-PP, most recently with a National R-PP Review workshop held on 12 January 2012 in Colombo. The present draft R-PP surely can yet enhance the ownership of the R-PP by local/community level stakeholders and the document suggests that their input will be heard and valued. But for this purpose a better understanding of REDD+ implications will be essential, why the review endorses the efforts to raise awareness and elucidate the concepts of REDD+ among stakeholders as initiated according to component 1b (table 1b-1). Further improvement regarding the ownership of the programme could emerge from the intended coordination effort among the numerous stakeholders and the establishment of a dedicated cross-sectoral REDD+ agency. The *Mahinda Chinthana* is guiding Sri Lanka’s development programme promoting policies and actions for the protection of the environment incl. biodiversity, sustainable management of (forest) resources and equitable economic development. The *National Physical Planning Policy and Plan* puts this principle into effect focusing controlled and considerate national economic development. Legislation (e.g. *Forest Ordinance* - FD managed forest area, *Flora and Fauna Protection Ordinance* - DWLC managed forest area, *National Heritage Wilderness Area Act No. 3*) as well as several environmental policies (incl. *National Forest Policy*) and plans (incl. *Forestry Sector Master Plan*) attest furthermore that REDD+ relevant objectives are an inherent part of Sri Lanka’s national development strategy.

2. Level of consultation, participation and engagement:

The consultation with a multitude of stakeholders is evident from the Statement of the National R-PP Review Workshop, the documented efforts presented with component 1b and the intended involvement of stakeholders presented with component 1c. The emphasis the document as a whole is revealing for participation matters suggests that the concept of the consultation and participation process is understood and approved, even though until now only limited experience and success could be achieved in terms of practice. Thus, the creation of awareness and understanding for REDD+ is of particular importance and the authors understand that awareness rising will be a process that needs continuous efforts and at best addresses the broad range of stakeholders/target groups in a customized way. However, also this section of the draft R-PP lacks vital details on how meaningful participation will be ensured, how feedback from stakeholders is considered during the readiness process (it will be indispensable to think beyond consultation alone) and what methodologies will be adopted for Sri Lanka’s Communication and Consultation Strategy Plan (CCSP). Little attention is paid to how women, in particular, will be engaged and it is not apparent from the draft R-PP if an analysis of gender-based concerns or risks will be part of the participation process (interestingly, “gender issues” are mentioned in the framework of land tenure/land use rights, but only there and without relation to the context). As of today Sri Lanka has not got institutionalized structures and mechanisms operational that manage participation. However, the proposed design of the national readiness arrangement (component 1a) envisages to engage a wide range of stakeholders (incl. government and international agencies, representatives from private sector, NGOs, CSOs, CBOs, IP) within the

decision-making REDD+ Programme Management Coordination Committee (RPMCC) as well as the country's UN-REDD Programme Executive Board (PEB). Coordination and collaboration between government agencies is not well developed but necessary due to the number of stakeholders. On the national level, the *Haritha Lanka Programme* is expected to establish the needed coordination among ministries to facilitate concerted actions for environmentally conscious, sustainable development. However, the programme is not yet operational.

3. Programme effectiveness and cost efficiency (maximum 150 words):

Given the current status of the draft R-PP, the reviewer can evaluate the programme's effectiveness and cost efficiency only with low confidence. Funding requirements will vary according to the need for capacity building, the outline of Sri Lanka's REDD+ strategy and the design of the MRV system. The activities introduced with the draft R-PP represent rather goals than specific proposals or options for the country. Programme effectiveness and cost efficiency, of course, must evaluate strategies and methodologies related to country-specific circumstances incl. capabilities that are available vs. capabilities that are required to achieve the designated goals. As of today, Sri Lanka cannot define such specific activities till the prerequisites are created and allow for a sensible choice of tools and methods. Further challenges for programme effectiveness and cost efficiency may result from the institutional setup, which still has to be established and will rely on newly created mechanisms for REDD+.

The activities proposed with the draft R-PP (even if not specifying options or methodologies) appear to be comprehensive and reasonable. However, most processes are not yet initiated and consequently cannot feed any assessment of early results nor a discussion of their advancement within the document. The schedule (as it is apparent from component 6) may benefit from a reassessment. There seems to exist some discrepancy as the MRV action plan is scheduled for mid-2012 while the assessments of drivers (end-2012) and capacities (mid-2013), which both are fundamental for the MRV design, are scheduled later. Perhaps this is only a misunderstanding on the reviewer's side provoked through the lack of specifics in the draft R-PP, but this should be clarified. The budget for the monitoring framework (component 6) was not provided and consequently remained unconsidered in the total budget (component 5). Donors other than UN are not mentioned, this applies also to (co-) funding from the government.

4. Management of risks and likelihood of success:

An adequate set of country-specific strategies, methodologies and tools will help to increase the likelihood of success of Sri Lanka's REDD+ programme. As mentioned before, Sri Lanka has yet to identify requirements and analyze the country's situation and capacities to design that kind of national REDD+ strategy. As soon as this will be done, the choice of measures can be assessed concerning its suitability. At present, the mitigation of the following risks are perceived as key factors to improve the likelihood of success: The coordination/collaboration between the stakeholders will be essential. Sri Lanka's UN-REDD+ programme will have to rely on newly created institutions and mechanisms and stakeholders are often inexperienced in joint operations. In view of the numerous ministries/government agencies especially cross-sector communication/coordination (rather a weak point in Sri Lanka) is important. This applies also vertical-wise in the hierarchy from local to national level. Forest is almost exclusively managed by national agencies and forest dependence of communities is comparable low in Sri Lanka. For the success of the national REDD+ programme continuous engagement from local stakeholders is irreplaceable. This not only applies to communities and the private sector, but across diverse sectors. Commitment combined with the required competence and capacity is equally important for administration, policy makers, law enforcement and the relevant technical departments in charge of forestry, land use, biodiversity and other environmental or socio-economic matters on the local level to establish REDD+ successfully on

a sustained basis. Risk mitigation will be addressed through Output 5.6 of the draft R-PP and will consider indicators on both the national and the local level. The document acknowledges weak governance in Sri Lanka as well as the need for improvement with its extensive potential for multiple benefits, governance safeguards will be integrated in the framework for risk mitigation.

5. Consistency with the UN-REDD Programme Framework Document and Strategy: &
6. Compliance with UN-REDD Programme Rules of Procedure and Operational Guidance:

The document employs the R-PP template, which is different to the UN-REDD NJP document both formally and regarding the standards to meet. Consequently, this review applied the R-PP standards for the evaluation of the document. However, guidelines for REDD+ itself are universal, regardless of which formulation is applied and, thus, the information and documentation provided with Sri Lanka's draft R-PP suggests that the Rules of Procedure and Operational Guidance were followed during its preparation. This comprises the participation and consultation with a wide range of stakeholders including national authorities, civil society organizations, private sector representatives etc. Emphasizing those processes throughout the document provides the confidence that they are recognized as an important building block of REDD+ in Sri Lanka. Generally, the range of actions as a whole as presented in the draft R-PP complies with the recommendations in the UN-REDD Framework Document. Again, a more in-depth analysis for compliance and consistency would require more specificity into the particular design of the envisaged activities. The understanding demonstrated in the document raises hope for little discrepancies in this respect.

Suggestions for improving the technical design of the National Programme Document of Sri Lanka:

In the current version of the document Sri Lanka presents a comprehensive and elaborate road map in the preparation for REDD+ readiness. Since serious works started quite recently in 2011, this is definitely a remarkable effort and understandably the collection, assessment and verification of data on the national situation (e.g. regarding capacity building needs, drivers and trends of deforestation/forest degradation, social and environmental impacts and risks, governance issues) is not yet as progressed as to meet the R-PP standards. These elements are the cornerstones of a customized national REDD+ strategy and thus are also key to develop a prospective R-PP. Nevertheless, some general recommendations can be given:

- Streamline the document. A major part of the R-PP appears to repeat guidelines and good practice as provided via UN-REDD, the FCPF etc. They are valid and useful, however, the R-PP is not a REDD+ textbook but a presentation of country-specific data, assessments, options and strategies to achieve REDD+ readiness. All essential information to understand these approaches should be presented in the main text (body) of the document and information should not be duplicated in the annexes (e.g. 3 tables with respect to drivers are presented, 1 in the main part, 2 in annexes).
- Whenever possible, be more specific. Currently, the lack of data and results from assessments as well as the rather limited experience that is valuable for REDD+ often constrains the definition of concrete methodologies. However, some lessons learnt from activities on project level are presented; the R-PP may benefit if they were better integrated for analysis into the various R-PP components. Furthermore, several demonstration activities are planned. The R-PP could provide more information (if available) on them to enable a better understanding regarding details of potential development options.
- Identify priorities. Most of the Outputs (as presented in Component 6) must start from scratch and the not yet established institutional structure will rely on unknown (but most likely insufficient) capacity.

Thus, you don't have the best starting point but the draft R-PP demonstrates awareness of the way ahead. There is still plenty preparatory work to do before entering the readiness phase for REDD+. Firstly, information is required on drivers and their impact on carbon and non-carbon values and their relevance for different regions of Sri Lanka. This data can be used (at least preliminary) for the development of suitable policies and strategies and associated activities to address the prioritized drivers. Drivers can be prioritized according their impact (some areas of Sri Lanka displayed an increasing forest cover – drivers can be positive, too – identify and strengthen underlying policies to make use of the identified processes as part of the national REDD+ strategy) and according feasibility (cost-benefit). This course of action automatically will reveal demand for capacities that must be developed to facilitate adequate activities and monitor their performance. Use a similar approach when you decide which carbon pools should be monitored and which IPCC Tier will be used. Use superior Tiers for key categories. Although transaction and implementation costs are higher, enhanced accuracy means more verifiable emission reduction/enhanced removals of carbon and ensures greater revenues. In this context environmental and social safeguards should be remembered as well, especially considering the biodiversity native to Sri Lanka.

- Carry out your plan with realistic expectations along the roadmap with milestones etc.. The draft R-PP presents a tight agenda covering a wide range of actions. Taking into consideration Sri Lanka has to start from a zero baseline in various aspects and more often than desirable (data sets are not existing, not assessed, not suitable or incomplete; institutional arrangements are not established and inter-agency collaboration has not got a very positive record track in the country; little, in some respects no REDD+ relevant experience available; no existing forest monitoring and inventory structures to build on for REDD+; forest related policies are generally consistent with REDD+, but local community and private sector participation are relatively new in Sri Lanka and de facto not yet involved into the actual forest management practice; there are unknown but probably extensive capacity building needs and awareness as well as capacities of the numerous stakeholders cannot be augmented overnight), the proposed schedule appears very ambitious, perhaps even overoptimistic as long as the document not provides a better understanding on how the conceivable demand for capacities can be met within the envisaged time frame. This applies in a similar way to the budget, which seems reasonably balanced among the outcomes but at the same time fairly speculative under the present information. Thus, the reviewer suggests that the monitoring framework should not only target the performance of the activities according to their indicators but also compliance to their respective budget.