

Independent Technical Review: Sri Lanka National Programme Document

UN-REDD PROGRAMME

Reviewer: Michael J.B. Green, Ph.D.

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General comments to National Programme Document of Sri Lanka (maximum 200 words):

The Readiness Preparation Proposal (R-PP) has been very thoroughly and well prepared. It is a very comprehensive document, with extensive and detailed information provided in a series of well presented annexes. There is much repetition, perhaps inevitably, and the main body of the text could be significantly reduced. This is not essential, as it would be unnecessarily time-consuming, but an observation that may be born in mind in future. There are, however, two design matters that would benefit from further attention: enforcement and use of renewables. These are highlighted in the last section of this review (page 6).

What will be important, however, as part of the Communication & Consultation Strategy & Plan (CCSP), will be to prepare a brief that simply and concisely outlines the ingredients of this R-PP, the processes by which they are driven and the mechanisms for their coordination and collaboration. Most importantly, the brief should clearly articulate the key stages and other opportunities when stakeholders, especially non-governmental (NGOs), indigenous peoples, and community-based organisations (CBOs), should engage in the process. This brief will need to be distributed via multi-media from the outset, with the schedule of the process updated regularly via the National Programme's website.

The importance of such communication cannot be over-emphasised. It will help to address the sense of a lack of direction and too many talking shops, with little tangible evidence of an agenda that is moving forward towards direct benefits for local people, along with other current concerns of citizens about: (a) the length of the R-PP phase, as this may not actually help stemming the urgent problems of deforestation and forest degradation in developing countries on time; and (b) the fact that R-PP does not address on-the-ground issues that drive deforestation.¹

Assessing the National Programme Document against review criteria

This document (*Sri Lanka REDD+ Readiness Preparation Proposal*, Final Draft, February 2012) has been reviewed in line with *UN-REDD Programme Rules of Procedure and Operational Guidance*, 2009.

1. Ownership of the Programme (maximum 200 words):

The National Programme is owned institutionally by the following key agencies: Forest Department (FD), clearly identified in the Proposal as the lead implementing agency and manager of 54% of the permanent forest estate; Department of Wildlife Conservation (DWLC), manager of 44% of the permanent forest estate; and the Ministry of Environment (MoE), which is the focal point for the UN Framework Convention on Climate Change (UNFCCC) and the Kyoto Protocol via its Climate Change Secretariat (CCS). CCS, established within the Climate Change Division of MoE in 2008, is responsible for preparation of the Green House Gas (GHG) inventory and National Communications to UNFCCC.²

The capacity of CCS will need considerable strengthening to fulfil its role within the National Programme, specifically with respect to preparing GHG inventories, reporting under the Measurement, Reporting and Verification for REDD+ (MRV) system, and establishing and institutionalising mechanisms for coordinating its activities with other sectors. CCS is understaffed and without the necessary technical capability to fulfil its mandate, much of which is currently performed by consultants.³

More widely, there is a high level of ownership among other stakeholders, including other government agencies, non-governmental organisations (NGOs), community-based organisations (CBOs), indigenous *Veddha* people and the private sector, as evident below (Section 2).

¹ Refer to page 38.

² Refer to page 18 and also Figure 1.3 (page 13).

³ Refer to page 20.

2. Level of consultation, participation and engagement (maximum 200 words):

There has been extensive and comprehensive engagement of a wide range of stakeholders in developing this Proposal, building on previous experience and established mechanisms developed under a variety of projects and other initiatives in recent decades. Supporting evidence includes:

- Statement from participants of the National Readiness Preparation Proposal (R-PP) Review Workshop held in Colombo on 12 January 2012 to review the draft R-PP. This was attended by over 40 participants and signed by 38 of them (FD = 24, DWLC = 1, NGOs = 3, CBOs = 3, universities = 3, private sector = 1, consultant = 1, uncertain = 2). Although NGO and CBO representation appears to be low, particularly in comparison to FD, the 3 NGOs are widely representative of NGO and CBO interests. For example, the Green Movement of Sri Lanka, which works for nature and people, is a consortium of 153 NGOs, CBOs etc and represented on 11 national and 13 international bodies.⁴
- This Workshop was the culmination of a process that included a review of stakeholders who might be involved in R-PP implementation⁵, identification of stakeholders to be involved in the National REDD+ Programme and UN REDD National Programme⁶, and the engagement of the National Focal Point (NFP) with many different *ad hoc* groups to provide inputs into the R-PP.⁷
- NGOs and CBOs were involved from the outset, with regional awareness workshops at entry point to REDD, followed by workshops in Colombo to develop the proposal and validate drivers of deforestation, as well as two workshops in Kanneliya to pilot local community involvement.⁸

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

Programme effectiveness is considered to depend largely on its design (reviewed in the last section), capacities and capabilities of the key implementing bodies, and adequate financial resources. Constraints identified in the proposal include: the weak inter-institutional coordination between the FD and DWLC⁹, who are responsible for the bulk of the forest estate; wider environmental coordination between all institutions, which is expected to be filled by the recently initiated Haritha Lanka Programme¹⁰ (see Section 4 below); and the limited capacity and capability of CCS (see Section 1 above).

A Project Management Unit (PMU) will serve the National Programme Director (NPD), who will head the UN-REDD National Programme and establish the National REDD+ Programme. This PMU model is based on previous experience with such projects as the Protected Areas & Wildlife Management Project (PAM&WCP)¹¹, which appeared to be a further layer of bureaucracy that added to delays in decision-making and timely delivery of outputs. For a PMU to be effective, it needs delegated authority from the NPD to take decisions and drive forward the Programme in a semi-autonomous, transparent and accountable manner, based on provisions embedded in the ToR.

The total budget is approximately US\$ 3.7 million, with US\$ 1.3 million allocated to Years 1 and 2, and US\$ 1million to Year 3. US\$ 1.6 million is allocated to developing consensus on the REDD+ Programme, establishing arrangements for its implementation, and developing stakeholder

⁴ <http://www.greensl.net/>

⁵ Refer to Table 1a-1 (page 18) and Annex 1a-2 (page 124).

⁶ Refer to Table A1a-2 (page 127).

⁷ Refer to page 25 and Section 1b (page 31), including Table 1b-1 (page 34).

⁸ Confirmed by an anonymous source, independent from government.

⁹ Refer to pages 23-24.

¹⁰ Refer to Box 1a-5 and 1a-5 (page 25).

¹¹ Refer to page 25 re: FRMP and PAM&WCP; and to Annex 1a-3 for the ToR of PMU (page 133).

awareness and participation; US\$ 0.8 million to developing the National REDD+ Strategy and a framework for its implementation; and US\$ 1.4 million to initiate and test the MRV process.¹² It is difficult to assess the budget allocation without knowing more about the basis of these figures (e.g. national versus international consultants, equipment and other capital costs etc).

4. Management of risks and likelihood of success (maximum 200 words):

A number of risks and assumptions are identified in the Monitoring Framework including: effective coordination mechanisms, political will, stakeholder participation and enabling conditions for them, access to information from remote areas, legal barriers to benefit sharing, availability of data and safeguards agreed between stakeholders.¹³ Key challenges to be addressed to reduce risks are:

- The absence of a definite coordination mechanism for environmental management is a major gap that is expected to be filled by the recently initiated Haritha Lanka Programme, for which there are plans to make it operational with assistance from UNDP.⁸
- A serious impediment to REDD+ is the blurred line between formal and informal tenure and rights, and between statutory and customary rights. Land tenure issues need to be addressed before engaging rural communities in REDD+, which may result in delays. It is intended to undertake a full analysis of the gaps in land ownership and related legislation in order to develop specific regulatory systems to underpin REDD+ activities of public and private actors during the readiness and implementation phases.¹⁴ The reviewer considers there to be too many intangible factors to be able to assess the level of risk that this issue poses on the likely success of the Programme.
- The effectiveness of the PMU is also identified by the Reviewer as a potentially high risk to the Programme, which can be addressed by ensuring that the Unit is mandated with an appropriate ToR (see above Section 3) and resourced with a highly competent and committed staff.

5. Consistency with UN-REDD Programme Framework Document and Strategy (maximum 200 words):

In general, the Proposal appears to be consistent with the UN-REDD Programme Framework Document and the Programme's 2011-2015 Strategy. Quick Start Actions are in line with the Framework Document¹⁵. The design of National Programme is consistent with the six Work Areas and associated Outcomes of the 2011-2015 Strategy and its overall delivery approach with respect to: MRV and monitoring (for which the lead agency is FAO); governance, engagement of CBOs, indigenous peoples etc, and transparent and equitable and accountable management of REDD+ payments (lead agency UNDP); and promotion of multiple benefits of forests and REDD+ as a catalyst for transformation to a green economy (lead agency UNEP).¹⁶

The main development partners are identified in the National Programme as UNDP, FAO, UNEP and UNEP-WCMC, and their roles and responsibilities as UN agencies are clearly indicated, respectively, in the Indicative Results Framework and Monitoring Framework.¹⁷ What are not as yet clearly articulated are the mechanisms by which PMU will coordinate development and implementation of work plans and budgets with these key development partners on a day-to-day basis.¹⁸

¹² Refer to Table 5-1 (page 111) and Table 5-2 (page 112)

¹³ Refer to the Monitoring Framework, Component 6 (page 117).

¹⁴ Refer to page 79.

¹⁵ Refer to Quick Start Actions in Annex 1 of the 2008 UN-REDD Programme Framework Document, which clearly is dated as they were designed in relation to the 2009 UNFCCC COP meeting in Copenhagen in December 2009.

¹⁶ Refer to Section 5 (pages 6-15) of the UN-REDD Programme Strategy 2011-2015, including Table 1.

¹⁷ Refer to Table 1c-1 (page 42), Table 5-2 (page 112) and Monitoring Framework Table (page 117) of the National Programme Document.

¹⁸ Refer to PMU's ToR in Annex 1a-3 (page 133).

6. Compliance with UN-REDD Programme Rules of Procedure and Operational Guidance (maximum 200 words):

The Proposal appears to be compliant with the UN-REDD Programme Rules of Procedure and Operational Guidance, 2009, as specified on pages 7-9. It is assumed that it has been validated by the UN Resident Coordinator and National Government Counterpart; and is evident that it has been endorsed by stakeholders representative of government agencies, NGOS, CBOs and other bodies¹⁹. A sample cross-check of the changes and recommendations agreed by stakeholders at the Appraisal Workshop held in Colombo on 12 January 2012 indicates that these have been accommodated within the Proposal submitted to the UN-REDD Secretariat.

¹⁹ Refer to the Statement from participants of the National Readiness Preparation Proposal (R-PP) Review Workshop held in Colombo on 12 January 2012.

Suggestions for improving the technical design of the National Programme Document of Sri Lanka (maximum 400 words):

Technical Design

p. 58 There is very little detailed analysis of capacity and ability within the Forestry and Wildlife sectors to enforce law and policy in order to address encroachment and poaching etc. Much of the legislation is in place but illegal and mal practices continue, often in the knowledge of the authorities concerned. What element of the strategy is going to address this aspect? What incentives and disincentives will be in place to ensure that the progress made in improving local livelihoods is reinforced by a stronger on-the-ground protection of carbon resources. This may be the weakest component of the strategy. Certainly, there is an information gap (p 60) on what foresters and wildlife staff need to do their job more effectively – comparative analyses of effectively managed and ineffectively managed forests would be instructive. This all relates to Outcome 4 (p 61). The issue is first mentioned on p 65 and, with respect to a capacity assessment of the forestry sector, on p 66.

p. 69 Communicate the need to use alternatives to wood for construction to architects and engineers

p. 70 Communicate the need to move toward a green economy. These two actions seem to be in direct contradiction of each other. Wood is renewable and, provided it is managed sustainably, it generates income for local economy, especially if procured from home gardens. The increasing use of alternative construction materials are likely to have more impact on the environment (e.g. carbon cycle, through burning of fossil fuels in manufacturing processes etc). Further, on page 70 it states “A major gap is research and development that targets national needs for timber, sand for construction, etc. There is also distrust among target groups to accept alternatives that are proposed by the state. More effort has to be taken to bridge this gap through demonstration of alternatives facilitated by research and development.” There is lack of a consistent and clear policy on these pages that needs tidying up and the reviewer is concerned about the apparent steer of architects and engineers away from use of renewables, assuming of course that supplies originate from sustainably managed forests (plantations, home gardens) that are not part of the natural forest estate.

Other Comments, Suggestions and Corrections

p. 11 High biodiversity and endemism of the Wet Zone forests, is also partly why Sri Lanka (together with the Western Ghats of India) is ranked among the world’s 34 biodiversity hotspots. To qualify as a hotspot, a region must meet two criteria: it must contain at least 1,500 species of vascular plants (> 0.5 percent of the world’s total) as endemics; and it must have lost at least 70% of its original habitat due to the impact of human activities²⁰. The second criterion is salutary and should not be overlooked!

p. 11 The total dense and open forest cover of the island (excluding forest plantations and other forms of vegetation) was estimated at 1.9 million ha in 2010. It would be more helpful to place this figure into context in terms of % area of the country and also previous coverages (eg Legg and Jewell 1995).

²⁰ Mittermeier, R.A., Gil, P.R., Hoffman, M., Pilgrim, J., Brooks, T., Mittermeier, C.G., Lamoreux, J. and da Fonseca, G.A.B (2005). *Hotspots revisited: Earth’s biologically richest and most threatened terrestrial ecoregions*. Conservation International, Washington D.C. 392 pp.

- p. 12 Table 1.1 – again, could we have some national context and have total PAs in forest and wildlife domains expressed as % of total area of country?
- p. 19 Ministry of Agrarian Services and Wildlife (e.g. Table 1a-1) appears to be referred to elsewhere as Ministry of Agriculture (e.g. Abbreviations).
- p. 23 Box 1a-3 . . . the Protected Area Network has been further divided into two categories. . . Category II includes areas where current development activities will be allowed to continue, but no expansion or new development will be discouraged. The last phrase should read: “but expansion or new development will be discouraged.”
- p. 35 Some missing numbers of stakeholders engaged in Table 1b-1, notably the Veddhas and communities.
- p. 72 Use international MAB reserves as demonstration sites for multiple benefits – this does not appear to be appropriate for Sinharaja BR, for which there is only a core area designated (11,187 ha) and no buffer or transition zones. Moreover, 8,864 ha are designated for protection as National Heritage Wilderness Area and inscribed on the World Heritage List.
- p. 117 Monitoring Framework for implementation of the R-PP is shown up to 2015, which appears to be inconsistent in relation to a 3-year budget of US\$ 4 million (page 110). The apparent anomaly should be explained.
- p. 139 Footer needs correcting as it states Annex 2a-3, when it is Annex 2a-1. Needs correcting up to Annex A3-1.
- p. 150 The conservation of natural forests followed in the wake of the National Conservation Review (NCR) of all remaining forest patches (>200 ha) in 1991-1996. This 5-year biodiversity survey paved the way for changes in legislation to provide for designation of conservation forests, based on the evidence that much of the country’s endemic forest diversity was highly localised and likely to disappear unless there was a radical change in forest policy as outlined in the 1995 Forestry Sector Master Plan. The national significance of the NCR (and also global significance, given that the only other tropical country to have undertaken such a comprehensive national field survey of natural forest is Uganda, also during the 1990s) does not come across clearly in the background material presented or elsewhere in the R-PP and belies, to the credit of GoSL, the tremendous changes in policy and practice that have occurred following the moratorium on logging and subsequent NCR in the early 1990s. (IUCN/FAO/FD National Conservation Review, 1997)
- p. 153 Biodiversity surveys of 7 of the 9 PAs for which management plans were developed.
- p. 155 There is no indication of sample sizes for the governance rating survey tabled, so it is not possible to assess the robustness of these data.