



Independent Technical Review: Sri Lanka National Programme Document

UN-REDD PROGRAMME

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General comments.

This document represents a considerable effort on the part of the forest department (FD) to initiate REDD in SL. During the 6 months of its preparation, there have been a quite a number of meetings with various stakeholders within the country, but it is clear that at present there is a somewhat limited understanding of REDD can offer, not only among the general public but also within the core team that has developed the document. The document itself is totally focused on the process (setting up a REDD organization, getting public discussion started on policy options, building capacity to develop the REL and the MRV etc), and lacking in solid analysis of what the real potential is for REDD in SL. I have listed some of the main shortcomings in this respect in the section on 'programme effectiveness and efficiency' because it is my belief that the programme of activities proposed, though in itself well thought out, cannot be carried out effectively and efficiently without a much more solid understanding of what the SL realities and options are, as regards REDD. Since I have gone into this point in much more detail below in the section on 'efficiency and effectiveness', I will not elaborate further here.

Assessing the National Programme Document against review criteria

1. Ownership of the programme

No information is given in the document as regards the submission process or role of the UN coordinator in the submission, or how this proposal fits in with the UN country programme in general, although the UN Resident Coordinator is proposed as the secretary of SL's REDD Programme Executive Board. However, the document is comprehensive in that it does review a large number of national policies of relevance to REDD and importantly, it finds that REDD is congruent and supportive of these. For example, the national plan for development ('Mahinda Chintawa') has a strong environmental component, in particular proposing increases in the percentage of forest cover (not merely reductions in deforestation) – though not mentioned in the NDP, the Mahinda Chintawa adopts the goal of increasing the level of forest cover to 35% (in one quote) or 43 % (in another quote) by 2020, a very ambitious target, given that current forest cover is around 29%. The National Forest Plan (1995) and the National Forest Sector Plan are also described, in which the intention to move from a top down, production oriented form of forestry to a more participatory and conservation based form are outlined (as well as the fact that these objectives have not yet have been achieved). In principle, all of these policies are in line with general

aims of REDD+. Moreover UNDP has financed a study on environmental assessment for rehabilitation of the North, following cessation of hostilities after 30 years, in which there is considerable attention to protection of forest resources, and several donor funded projects which attempted to promote community forestry are described.

There is much reference to the importance of FPIC, and how it will be assured in the process.

There is no indication at all of government co-financing. The budgets suggested make no mention of what proportion is envisaged as government input, giving the impression that it is supposed that UN REDD would supply all the funding, although this is not explicitly stated.

2. Level of consultation, participation and engagement

Sri Lanka is a relative newcomer to REDD+, and this is reflected in the content of the main document (NPD) and in the supporting evidence. Although SL officially joined UN-REDD in 2009, it was only in June 2011 that a concrete start was made on this document. Understanding of REDD is still very low within the country, as some of the general comments recorded at a meeting to approve submission of the NPD on 12 January 2012 clearly show. The document has apparently been produced owing to the dedication of a very small group within the Forest Department (FD) which has been trying to push the issue for some time. Since June 2011 there has clearly been a strong attempt to get a broader base of support for the idea. This base is still limited, but for a project which is really only 6 months old this is not at all surprising. Given the short time that has elapsed, a relatively large number of meetings and discussions have been held.

The NPD clearly indicates that there are two central agencies involved in forestry, the FD and the Department of Wildlife Conservation (DWLC); they fall under different ministries. Although the DWLC has clearly been consulted, it is not clear to what extent it has supported the REDD+ process so far in material and political terms. Only one DWLC representative was present out of the 39 people at the 12 January meeting to approve the document. The support of NGOs is also not clear (there seem to have been only 2 NGO reps at the meeting, although there were 3 reps from 2 CBOs in addition as well as 3 from academic institutions). This despite the fact that quite a number of environmental NGOs are listed in the appendix as having the competence to support REDD (why were they not at the meeting?). Private sector organizations were represented by only one person. The vast majority of attendees were DFOs and RFOs, that is, government forest officials. Throughout the second half of 2011, meetings had been held in various parts of the country and with different departments of the government, and NGOs were invited to some of these, particularly regional meetings. Some meetings were held with Veddha communities (the last remaining 'indigenous' forest dwellers, now settled in villages), but there is little evidence that other rural groups have been consulted, for example, those who carry out chena cultivation (referred to in the report as slash and burn, but in reality swidden

agriculture with shortened cycles), which is commonly the source of a considerable part of family income, adding to that from the more intensive rice cultivation.

It will take time before enough knowledge and interest is generated for a broad-based REDD+ programme, but the process has started. Such a broad base will be essential since (in SL as in all other countries) most of the drivers of deforestation and degradation have their base outside the forest sector, meaning that major changes in governance of sectors such as agriculture and urban development may be required. These sectors consist of powerful players in the national economy and powerful political interests, and change can only be brought about if there is sufficient pressure from above and from the public, represented possibly by NGOs and civil society organizations. The report is clear that despite several earlier attempts, there is no real coordination or rationalization of decisions to fit into stated policy as regards environment, particularly between Provincial Councils and central government. The idea that such change in governance can be brought about by 'sharing of information and communication' (as suggested in various places in the NPD) is at best a euphemism. In reality, it may be supposed that there will be serious conflicts here. The fact that the general objectives of REDD tie in well with official policy as regards development (the Mahinda Chintana, for example) does not mean that it ties in well with the reality of decision making as regards land use change, which is to some extent ad hoc, dominated by short term and local political interests rather than long term environmental goals (a characteristic which is noted, though not stressed in the document). The NDP is open about the failures of earlier plans to bring in participatory and conservation forestry, which are a clear indication of the difficulties here.

3. Programme effectiveness and cost effectiveness

The document is directed almost 100% to process, not to content: in other words, it lays out ideas for how to get people talking about elements of REDD (policy instruments, REIs, MRV, safeguards etc), and it suggests the outline of an organizational structure. But it does not really propose any concrete options that might be discussed in such conversations. Perhaps this is what is expected of an NDP to UN REDD, but my feeling is that would be a much more useful document if it presented at least some basic (alternative) options to encourage debate, rather than leaving everything wide open, particularly as regards the internal policy options for promoting reduced deforestation, reduced degradation and forest enhancement. On these, it speaks only in very broad generalities.

The following are topics on which much more specific information would have been very welcome.

- The distinction between deforestation and degradation (they are continually referred to together, as if there were no difference between them, and no difference in their geographical incidence). In reality, drivers of deforestation in SL (clearance for tea in the wet zone, for irrigated agriculture in the dry/intermediate zone) are quite different from drivers of degradation (gem mining, chena cultivation in dry zone, fires, though these are possible in both

zones), and therefore quite different policies would be needed to counter these different processes. This could be much better spelled out in the document.

- The fact that 86% of the forest is in the dry and intermediate zone, and that most of the losses have been in this area, meaning that for an effective REDD programme there obviously has to be specially attention to this type of forest. Pros and cons (costs, feasibility of acceptance, likely carbon savings per hectare) of working in different types of forest could be spelled out.
- The fact that in addition to 29% of forest cover, SL has between 22 and 26% (depending on the source) of tree based agricultural systems, including rubber and homegardens. Their presence is noted, and homegardens (referred to as 'analogue forests') are mentioned frequently with the idea that they could be included, but the question of how to include them under REDD is hardly considered (most homegardens are already densely populated with a large range of tree species, increases in carbon density may not be easy to achieve; to what extent could homeowners without homegardens be persuaded to develop them, and how much room is available for this?)
- One important consideration in this regard is the definition of forest, which the report leaves completely open 'for discussion' in public debate on REDD. However, the definition which SL most recently submitted to the UNFCCC is: canopy cover 20%, height 3m and area > 0.05. This would be sufficient to include both rubber and homegardens, though probably not some other spice and cocoa areas. It would have been helpful if the report could have stated this clearly. If rubber is considered also to be 'forest', this would mean that natural forest could be cleared and replaced with rubber without 'causing deforestation', but it would entail a considerable loss of carbon density (i.e. it would be registered as degradation).
- There is no suggestion or list of options for how REDD in SL could tackle the real underlying drivers of deforestation and/or degradation. Significantly, this was a point raised in the public debate, but the document has not responded to it.
- With regard to establishment of the REL, more analysis on the loss rates would have been helpful. As the NPD mentions, rates of deforestation have slowed down considerably. According to some reports, the forest area decreased between 1999 and 2010 from 29.4% to 29.1% of the land area, or about 6000 ha per year (-0.3% in terms of total forest area), although other reports indicate there may actually have been an increase in forest area over this period. Moreover, the Mahinda Chintawa plan implies that much greater areas are to be covered with forest in the business as usual scenario. If the first estimate is correct then SL is would be among countries with LCHD, but if the second set of estimates is more accurate (increased forest areas), SL would not be able to earn any carbon credits from reducing deforestation. This possibility needs to be considered, and what SL's REDD strategy would be in that case.
- The bigger potential under REDD+ for a country like SL may in any case be in reduced degradation and forest enhancement, particularly in the dry and intermediate zones where a lot of the forest is well below intact levels of stock, and it would have been more impressive if this message had been presented clearly: firstly by identifying this as a crucial objective independent of that of reducing deforestation, and secondly by focusing on what types of policy

options SL could potentially use specifically to counter degradation, rather than listing a lot of strategies which are intended mainly to deal with deforestation.

- Again, in terms of setting the REL: the end of the period of civil unrest could easily lead to an upsurge in deforestation, as dry and intermediate forest areas in the north and east have once again become accessible, and as investment once again begins to flow for development activities (the document hints at this in several places). This, one would have thought, would be a major strategic factor for the design of the REL, but discussion on the REL (in the appendix) does not include even this basic consideration, focusing instead on 'national circumstances' in general terms of population, economy etc. and on the need for a TF to develop the REL.
- It is not at all clear if the difference, and significance to future policy options of the difference, between a REL and a RL is understood. Yet this would be important input to the public debate on REDD, it needs to be understood and explained. Ditto the idea of a subnational, rather than national, REL.

I am not disputing that there is need for a period of intense discussion on all aspects of REDD in SL with a wide range of stakeholders in order to create consensus on a programme that is both workable and acceptable; that goes without saying. Many of the decisions that have to be made are highly political and need the widest possible input. However, unless some of the basic technical signposts, such as those mentioned above, are made clear by people who have a good understanding of what is possible under REDD in SL, public discussions are likely to flap about in generalities rather than focusing on specifics. My point is that for an efficient discussion period, some of these issues really do need to be spelled out, in some cases with a clear list of options where choices have to be made. This could and perhaps should have been done in the NPD, but it could also be done for another document to be distributed within SL before further action is taken. They are basic facts of the specific SL case, which need to be laid out clearly so that the debate on how to proceed can begin on a good footing.

4. Management of risks and likelihood of success

There is no explicit strategy mentioned for the management of risks. The biggest risk is that REDD, like so many earlier environmental programmes, will not succeed in changing the existing power structure, and will not be able to coordinate land use decisions as regards forest or moderate the impact of other sectors of the economy on them. But this is not a risk specific to SL, it is common to most countries. The likelihood of success is difficult to assess.

5. Consistency with UN REDD Programme Strategy 2010-2015

The Programme Strategy (section 5) defines 6 key work areas (MRV/national REDD+ governance/stakeholder engagement/multiple benefits/ transparent, equitable and accountable management/forest sector transformation) The NPD for Sri Lanka is built up of 6 sections, but not these same sections. It appears to follow a different template

(Intro/organize and consult/prepare the REDD+ strategy/develop national REL/RL/MRV and safeguards/ results framework/reporting and monitoring). This is probably explained by the fact that the document is clearly intended as a proposal for Readiness Support rather than Targeted Support.

In my view however it covers all the work areas specified, and it goes to great lengths to include UN REDD principles such as FPIC and inclusion of indigenous people, although so far involvement of other rural stakeholders has been limited. There is attention to the need to distribute benefits to stakeholders and recognition of the needs for ensuring promotion of other values (biodiversity etc).

Other criteria mentioned in the Programme Strategy ("operational principles for National REDD+ Strategies") include the following:

- Demand and context driven: difficult to say how widespread the demand and interest in REDD is in SL but doubtless it is growing.
- Country owned: the document has clearly been developed by a national group, although so far only by a narrow group of actors
- In context of national policies and economic development: the NPD has strongly related the proposal to other policies past and present, and to the current economic situation.
- Supportive of UNFCCC decisions: in a general sense, yes, but in general the document does not show a really strong understanding of current UNFCCC policies (e.g. RELs versus RL, forest definitions etc)

6. Compliance with UN REDD operational guidelines (particularly sections 2.1-2.4)

- It is not clear whether the NPD is requesting support for the full range of Readiness activities or an initial package.
- Formulation has clearly been country-led, it is not clear if there was any technical assistance from the UN Country Team (none is mentioned) or from the participating UN organizations.
- It is not entirely clear if Operational Guidance on engagement of Indigenous People was followed, although the only truly indigenous people were involved in some workshops. As noted above, engagement of other rural people seems to have been limited.
- It is not clear how this document compliments other national REDD readiness planning processes (it appears to be the only activity on REDD). No linkages to other REDD processes are mentioned.

- The document was validated/endorsed at a meeting on 12 January 2012 by 40 participants from government, NGO and civil society (see my comments above) but whether this has any legal status is unclear. There is no indication that the UN Resident Coordinator was present. A document stating that the management arrangements and proposed outputs should be submitted to the UN REDD policy board was signed by the 40 participants.
- There is apparently no national steering committee as yet.
- I presume that the document was then submitted via the UN Resident Coordinator although I have no evidence to show that this was the case.
- It appears that comments made at the meeting on 12 January have not yet been addressed in a new version.

Suggestions for improving the technical design

My main suggestion is that before further work is done in public consultation, building public support, building the REDD organization, creating capacity for RELs and MRV, a solid analysis should be made concerning the range of options that are realistically open in SL for developing policies that could reduce rates of deforestation, rates of degradation (as a separate issue) and enhance tree carbon stocks, including an assessment of which of these strategies is likely to yield better results, given the possible REL scenarios. I do not think that such an analysis can be created in the first instance by broad public discussion, it needs to be prepared by a small team of experts, preferably a team which is composed of senior members of FD and DWLC working together, if necessary with guidance and advice of a small number of local consultants/experts, and then distributed for discussion, comment, and improvement by a wide range of stakeholders.