

August 28, 2013

Comments from the United States on the Approval by Mail: Gazetted Forests Participatory Management Project for REDD+ (PGFC/REDD+) (FIP) AfDB

Dear Patricia,

We appreciate the opportunity to review the project **Burkina Faso: Gazetted Forests Participatory Management Project for REDD+ (PGFC/REDD+)**, submitted by the Government of Burkina Faso and the AfDB.

We welcome the amount of information contained in the document on the drivers of deforestation in Burkina Faso as a whole and the detailed description of the relevant legal and regulatory framework. However, we have questions on some of the activities proposed in the project, particularly with respect to component 2.

In general, we think more information on the nature of the activities in component 2 would be helpful, in addition to additional analysis of the barriers to implementation of these activities, the nature of and rationale for FIP support, and the feasibility and viability the activities after the FIP intervention. We also think the argument for exactly how these activities will lead to reduced greenhouse gas emissions or enhanced removals could be clarified.

In particular, we have the following questions:

1. In general, what is the exact nature of the interventions to take place under component 2 under the headings “silvopastoral development,” “wildlife oriented development,” and “forestry development.” What is the rationale for these activities – how would they, if implemented successfully, contribute to REDD+ objectives? Please describe the drivers of deforestation relevant to these particular geographic areas, and the barriers to implementation of project activities that need to be overcome. What form would FIP support take, and who would be involved?
2. With respect to the building of eco-lodges, where would that occur, what entities would FIP support, and on what terms? Has there been any analysis of whether eco-lodges are a viable business strategy in these areas? Please describe how the eco-lodges would lead to reduced deforestation and forest degradation.
3. Re the “forestry development” component, please provide a bit more information on the “planned reduction in the quota of timber.” Please describe the timber harvesting activities that are now taking place, and how they will be reduced. Is this a reduction in firewood production? If so, what alternative energy sources will take its place?
4. The economic and financial analysis of alternative activities is crucial to understanding whether the proposed activities are viable, but the information presented in section B6 is thin. Has additional analysis been done on these activities? Would

these activities lead to diversification of income sources, or switching of income sources?

5. Under section 2.1, we note that among the expected results is construction of 2487 km of forest roads. Can you provide more information on why forest roads are being constructed, and how this will lead to reduced deforestation and forest degradation? What safeguards are in place to mitigate potential negative impacts of additional forest roads?

6. Please provide more information on the 95 basic infrastructures build for exploitation, processing, and marketing of forest products.

7. Re the 18000 ha of reforested or regenerated forests, who will undertake this reforestation activity, and what will the nature of FIP support be?

8. Similarly, please provide more information on what is being provided, and on what terms, with respect to “providing 180 groups with operating equipment and forest products processing facilities,” “equipment...with 8 warehouses of non-timber forest products, 10 multifunctional platforms, 25 beekeeping kits, 5500 improved stoves,...” etc.

9. We were unsure of what was meant under section 2.3 re compensation to those who will no longer have access to forests after the project is implemented. What groups will be affected, and how? What is the nature of the compensation? Is there any resettlement activity planned in this project?

10. With respect to the planned gazetted hunting concessions, has there been any analysis of the impacts of such concessions on biodiversity?

11. We note that reduction of biodiversity loss and reduction in poverty are expected outcomes of the project, but we did not see in the results framework measures that would pertain to these areas?

12. We had a couple of questions on the policy/regulatory framework as it pertains to activities under this project. On page 6, there is a mention of a levy that is under conditions with respect to community forest management. Could you provide some additional information on what this levy is, and to what extent it is a significant barrier to participatory forest management? Also, we noticed, on page 9, mention of a delay in finalizing the relevant provisions of the Public Policy on land and forest security. Will the FIP project support finalization and implementation of this policy?

Thank you once again for the opportunity to review this project.

Katie Berg
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U.S. Treasury Department