

August 26, 2013

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

Dear Patricia

Thank you for the opportunity to comment on the Burkina Faso FIP project. Overall, the proposal is clear, provides a good overview of the drivers of deforestation nationally, the institutional and policy framework, and of other donor activities and their interactions in related sectors. We welcome the fact that it will provide valuable experience in testing REDD+ related approaches in dryland forest environments, and that it has highlighted the potential combined mitigation, adaptation and livelihood benefits from the intervention.

The theory of change however, isn't always clear, and for this reason, we have the following questions/comments. Many relate to a level of technical detail that we are sure can be readily addressed in the start-up phase.

Rationale:

1. Component 2 mentions the building of "anchor infrastructure" comprising 2000km of road and 2 eco-lodges, etc. The infrastructure related investments take up a significant part of the budget. It would therefore be helpful to have a fuller description of why and how these infrastructure investments are needed to achieve the improved forest management objective.
2. A major selling point of the project is that it will contribute to resilience and climate change adaptation as well as mitigation. However, other than "diversification of income sources" (pg. 6 of Appraisal doc.) there are no further details on how this will be achieved. More detail of how the project interventions will contribute to longer term resilience, how improved management will make forests more resilient to climate change, and how any livelihood diversification interventions will be designed to be "climate smart", would be helpful.

Measuring results:

3. Although the calculation of CO₂e savings is very clearly presented, it would generally be helpful to get a breakdown of hectares per project component alongside the CO₂e savings in the project summary and/or log frame. Also note below comment on the baseline emissions.
4. The proposal claims 4.7mt of CO₂e savings which yields a cost/ton of \$2.5/t. Thoroughly applying the 40% discount to be conservative and take into account permanence/leakage as suggested by the proposal itself would reduce the figure to a total of **2.8mt CO₂e** saved and **\$4/t CO₂e**. The proposal includes an indication of the business as usual scenario and corresponding emissions, this should be included in the log frame. The proposal does not mention the role of carbon markets and it would be good to get clarification whether the project intends to seek carbon finance through the CDM.

5. What drove the assumption of 40% non-permanence/leakage and why was this considered to be a good estimate? The document could have outlined more explicitly how the project intends to mitigate non-permanence and leakage.
6. This project has been designed to complement the activities of the World Bank implemented FIP proposal, in the same geographical regions. This makes sense and certain costs will therefore be shared between the two projects. It would be helpful to have some description of how the two projects will account for their impacts given that there is bound to be some overlap in impact areas. For example, how will the projects ensure that there is no double accounting of carbon sequestered?
7. There appears to be no baseline or monitoring strategy for ecosystem services or biodiversity – apart from some references to these being improved – it is unclear how this information will be gathered or verified. This is important given the biodiversity dependent interventions being proposed.

Investments:

8. The drivers of diversification are presented in general terms, for the country as a whole, Are there any specific drivers of deforestation that may require site specific measures?
9. There is a substantial amount of (labour intensive) construction envisaged within this project. Yet there is no mention of future maintenance strategies. Will the upkeep of the road network for example be the responsibility of local community management groups? Will the state budget allocate resources for the maintenance of the Nazinon training facility?
10. The construction of eco-lodges is referred to but gets no analysis within the economic appraisal, there is no indication of whether these are to be community managed, if so, how? Or privatised as tourism concessions?
11. Gazetted area hunting concessions are planned in order to generate income from wildlife (pg 36 of technical annex). In light of absent baselines on wildlife numbers, reproductive rates, habitat status, and sustainable yields this seems to be a high risk strategy encouraging hunting in forests where poaching and illegal wildlife trafficking have already undermined wildlife numbers. This does not seem sustainable – would recommend investigating sustainability of present populations and contribution of these to forest health, wildlife and biodiversity should be considered as part of the REDD+ package and therefore need protecting.
12. The economic appraisal generally is weak on the co-benefits (e.g. value added activities in NTFP processing, employment and income generation through labour intensive infrastructure investments?)
13. It is not clear how communities will make contributions to any of the projects, except perhaps in terms of labour. If entities trading in non-timber forest products for example are to be supported and encouraged to add value, it would be helpful to know how this is going to be done, without undermining market forces and the fledgling private sector referred to in the appraisal report.
14. PES is mentioned (additional to the carbon payments) but not really developed any further. We are not clear on how this will work. The section of the

appraisal report that mentions a range of PES schemes being set up by other projects (Forest Development Fund, Environment Intervention Fund) could be further explained in the technical annex.

15. The reference to improved stoves suggests a distribution rather than support for the establishment of the whole value chain. Is this the case? The technical annex refers to charcoal making as a key driver of deforestation in some of the project areas, but this doesn't seem to be particularly well addressed in the project interventions, other than to suggest that fuelwood production will decrease (we presume as a result of an end to open access and the promotion of more rigorous management).

Risks and safeguard issues:

16. The ESMP identifies a range of environmental and social risks but does not provide much information on the mitigation of the risks.

17. Although there is much to celebrate with the legal and policy reforms under way in BF, the technical annex does reference the continuing tenure insecurity issues and delays to implementation of reforms as a major driver of deforestation. It would be helpful to have more analysis of why implementation is delayed and what the implications are. This does not appear as a risk which is surprising. Insecure tenure is likely to mean that continued patterns of pressure on forest areas continue and the risk of leakage/displacement will also continue

18. Risk of elite capture of committees etc as well as benefits. Will forest management committees and other joint forest management arrangements ensure that the forest management priorities of the poorest are included in forest management plans? Will the access rights of the poorest be protected?

19. We would like more information about the communities that are settled within gazetted areas. We assume that they are NOT to be removed from these areas. pg. 37 of the technical annexes states "Although the law prohibits human occupation of the area gazetted as forest areas of the state, a study conducted by the Forest Department reports that forty administratively recognized villages and hamlets of cultures whose population varies between 200 and 3 200 people are located in gazetted forests (Difor, 2007)." But there is little description of what is going to happen to these communities – pg. 38 discusses compensation for loss of earnings but this does not specifically refer to the populations living within the reference areas and what will happen once they "delineate and demark" the forest areas. What specific measures will be taken to work with them in favour of sustainable forest management, and how will this be negotiated with communities that remained outside the gazetted areas, but are equally dependent upon forest resources for their livelihoods. In general, a bit more analysis of the potential winners and losers from preventing open access and introducing more rigorous management regimes would be beneficial.

20. How will the gains to be made from improved forest management be protected from the possible negative consequences of increased access from road construction. We were not clear on the plan to mitigate the very likely impact these would have on unregulated hunting and logging. It would be useful to

understand clearly how impacts from road construction – long term / short term both social and environmental will be managed and mitigated.

21. There is reference to planting drought resistant trees. Are these going to be indigenous species that are present in the local area already? This decision will have impacts on ecosystems and food webs, but could also be important in terms of survival rates

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