

August 6, 2013

**Comments from Australia on Approval by Mail: Democratic Republic of Congo - Integrated REDD+ Project in the Mbuji-Mayi/Kananga and Kisangani basins (AfDB)**

Dear Patricia

Thank you for providing Australia with the opportunity to comment on the *Democratic Republic of Congo (DRC) Integrated REDD+ Project in the Mbuji-Mayi/Kananga and Kisangani basins (AfDB) Project proposal*. We note that the decision on this proposal has been postponed. However, in addition to the comments provided by the UK, Australia has some comments we would like to provide to the AfDB their consideration and response.

We recognise the Project closely aligns with the national REDD+ strategy and other REDD+ activities being undertaken in DRC, and acknowledge that a significant amount of work that has gone into developing the proposal. However, Australia has some concerns regarding the proposal, and would like to see these issues addressed before we endorse the project:

*Success of alternative livelihoods activities*

- As a large number of people within the Project areas are dependant of forest resources for livelihood, the success and sustainability of the Project will depend on the successful uptake of the proposed alternative livelihood options. We would like to understand how successful these are likely to be in the target community e.g. were local communities participants in the design of these alternative livelihood activities? As the implementation of these alternative livelihood projects will be undertaken by local non-government organisations, we would also be interested in better understanding the capacity of these organisations to implement the project and what assistance they will receive to undertake this task. We would also like to see further information on how the beneficiaries will be selected for these Projects.

*Potential carbon market funding*

- The project mentions that carbon market funding may be sought, however few details of this have been provided. It would be good to better understand which components of the project may generate ERs, and for which market e.g. voluntary market, CDM. An estimate of the total volume of ERs likely to be sold on carbon markets would also be useful.

*Complexity and ambition of the project*

- The project is very ambitious and we commend the proponents for attempting to tackle multiple drivers of deforestation, using multiple implementing entities across multiple forest and tenure types. Considering the large scope of the Project and institutional capacity constraints within DRC we have some concerns that, in its current form, the Project is overly ambitious. Implementation

involves coordination between several levels from the Ministry of Environment, Nature and Tourism to local non-government and non- government organisations and we would like further information on how this will work, and particularly how the project will build on previous experience doing this. It would be helpful to know if phasing has been considered for this project and if so how the project might be split into multiple phases.

In general Australia also agrees with the suggestions put forward by the UK. We understand that the UK has suggested a phone conference with the AfDB to discuss their concerns and possible resolutions. Australia would be interested in joining this discussion if possible. In line with the UK's suggestion, the week starting 5 August (any day except for Friday) would be suitable for us, with our preferred time for calling in being between 8 am to 9 am London/Tunis time.

Kind regards,

Kate Sangster

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