

**Sent by Florence Daviet, World Resources Institute, 4/06/2009**

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"Florence Daviet"  
<FDaviet@wri.org>

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To <cifadminunit@worldbank.org>

cc "Smita Nakhooda" <SNakhooda@wri.org>, "Jacob Werksman" <JWerksman@wri.org>, "Crystal Davis" <CDavis@wri.org>

Subje WRI comments on FIP  
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Thank you for allowing us to review the Forest Investment Program design document. WRI has a few comments about the document that we hope will be taken into consideration.

Please let me know if you have any questions or comments.

Best,  
Florence

Florence Daviet  
Climate and Energy Program  
World Resources Institute  
202-729-7822



[fdaviet@wri.org](mailto:fdaviet@wri.org) [WRI Comments on the FIP design document.pdf](#)

Forest Investment Program  
World Bank Group  
1818 H Street, NW Washington, DC 20433 USA  
Re: WRI comments on the FIP design document.  
March 30, 2009

Dear Mr. Dieterle,

Thank you for allowing us to review the Forest Investment Program design document. WRI has a few comments about the document that we hope will be taken into consideration.

1. On the “**OBJECTIVES AND PURPOSE OF THE FIP**” we have the following thoughts:
  - a. On point c, we would like to mention that while the link between investments and emission reductions is important, more important may be to better understand the link between the implementation of policies and measures in country and long term emission reductions and maintenance of health forest ecosystems. This will be very important if there ends up being a significant time lag between implementation and actual emission reductions seen in certain types of actions – for example farmers may take time to adopt new technologies and policies to reduce fires may not be equally relevant (and change the emission rate) every year, etc.
  - b. We would suggest adding to the objectives of the FIP that they should seek to pilot activities that actually generate their own value over time so that countries do not require outside financing for the continuation of the activity. Pilot could show countries that there are some actions that in fact, once they have been achieved have their own development value. This will be vital for the permanence of any given action since international financing can not forever be counted on.
2. On the **FIP PRINCIPLES**, we have the following thoughts:
  - a. **Climate change mitigation potential:** We would suggest the following language. “FIP investments should be used to help countries make the transition to a low deforestation and forest degradation, and therefore GHG emissions, development path.” This allows the program to by-pass the “emission reductions” language, which immediately means that countries with historically high rates of deforestation are being targeted and does not capture the true transformative change idea that the principles and objectives reflect.

- b. **Inclusive processes and effective participation of all important stakeholders, including indigenous peoples and local communities.** We would suggest that the idea of accountability to stakeholders be added to this section. For example by adding the following phrase: “Effective participation requires transparency in all phases of the FIP process, from the development of FIP programs, projects and strategies, to their implementation and evaluation. It also requires that the decision-makers can be held accountable by stakeholders where programs, projects and strategies have not been carried out as promised through the FIP process.”
  - c. **Measurable outcomes and results based support.** We would suggest the following language in this section: “The FIP should be results based over time, and should promote measurable outcomes with regard to the effectiveness of FIP investments on emission trends and REDD; improvements in the governance of forests, including clarity of land tenure, improved capacity and coordination of government agencies in developing, implementing, and enforcing forest laws and policies, and improved transparency and accountability in decision making processes; livelihoods and poverty alleviation, climate resilience, biodiversity and other forest benefits. Performance measures and procedures for performance assessment should be part of the project design, including monitoring by local civil society and other relevant stakeholders, and should serve as a basis for course correction and financing decisions during the implementation.”
  - d. **Forest related governance.** We recommend adjusting the language in this section with the following language: “The FIP should capitalize on the lessons learned concerning inclusive and effective governance reform and ensure such processes are undertaken in order to ensure forest related climate change outcomes are supported institutionally within the country and will result in lasting changes.” Improvements in governance are vital to achieving lasting change in forest management, but are sometimes the most difficult activities to undertake; these must not only be encouraged but ensured. Please also see the language on performance metrics for governance improvements as a way to ensure change is occurring.
- 3. On the **FIP SUB-COMMITTEE** we recommend removing the brackets around 16 c) “Two representatives each from indigenous peoples, NGOs, and the private sector, identified through an open and inclusive self-selection process” and 17 “Members referred to in paragraphs 16(a) and 16(b) will be decision-making Members. Members referred to in paragraph 16(c) will be decision making members on all matters, except with respect to decisions made in accordance with paragraph 21(g) for which they will be non-decision-making members.” This seems to us vital for ensuring that the FIP process is seen as credible and by-pass much of the criticism of the FCPF process.
- 4. On the **FIP PROGRAMMING PROCESSES** we recommend clarifying that the “multi-stakeholder national level steering committee” should include

“representatives of local governments, IPGs, local community, NGOs, private enterprises and other members of civil society.” These groups are often marginalized in these processes and may be difficult to reach, but will be vital for the implementation of many of the activities and should not be excluded.

5. On the **MONITORING AND EVALUATION** section we have the following text recommendations:

- a. Full reporting criteria and a performance measurement framework will be proposed by the FIP-SC and approved by the Trust Fund Committee of the SCF. Performance criteria should include, but not be limited to, emission trends and REDD; improvements in the governance of forests, including clarity of land tenure, improved capacity and coordination of government agencies in developing, implementing, and enforcing forest laws and policies, and improved transparency and accountability in decision making processes; impacts on livelihoods and poverty alleviation, climate resilience, biodiversity and other forest benefits.
- b. Performance measures and procedures for performance assessment will be part of the project design, including monitoring by local civil society and other relevant stakeholders, and should serve as a basis for course correction and financing decisions during the implementation.

This type of language is necessary to ensure that the principles of governance are actually respected and achieved.

Thank you for the opportunity to comment. Please contact Florence Daviet at [fdaviet@wri.org](mailto:fdaviet@wri.org) if you have any questions.

Best,  
Florence