

Sent by UK Department for International Development (DFID), 4/06/2009

----Forwarded by Patrick Vincent Verkooijen/Person/World Bank on 04/06/2009 06:41PM ----

To: pverkooijen@worldbank.org
From: Amy Sullivan <amyloisesullivan@yahoo.co.uk>
Date: 04/06/2009 06:09PM
Subject: UK Comments on the FIP Design Document

Patrick - please see UK comments below and attached...happy to talk through tomorrow when I'm back in the office.

Many thanks!!

Amy

Dear FIP team

Thank you for the opportunity to comment on the design document and information notes. We have provided comments (in addition to earlier private sector comments) in the design document attached which we hope help to clarify the role of the Expert Group (EG). Key tasks for the EG include making recommendations to the FIP SC on selection criteria and providing the FIP SC with a short list of countries on the basis of approved criteria. The PPCR EG developed indicators associated with selection criteria as the basis for developing a short list – it may be useful to apply a similar method here. We aim to provide further comments on bracketed text at the final design meeting.

We invite the Administrative Unit to make recommendations in May on the issues that should be covered at the first FIP SC meeting and to begin to pull together the supporting information required to underpin those decisions. This might include information to underpin a decision on the number of FIP pilot programmes (i.e. examples of the costs of transformational action), draft ToRs for the Expert Groups (EG) and EG selection criteria or a recommendation of experts. Consideration should be given to whether to build on EG which support other REDD initiatives. In addition, proposals on additional or second order selection criteria would be useful.

Regarding the information notes we have the following comments:

Complementarity between FIP and FCPF:

In general we feel that this note has been superseded by the discussions that took place at the March design meeting. There it was noted that presenting the FIP as the 'missing middle' between readiness and carbon payments was confusing – e.g. it is not the case that all FCPF participating REDD countries (37) will be able to receive FIP funds for the implementation of R-PLANs. The FIP is a targeted programme, supporting piloting change at scale in a small number of countries. At the request of the chair, the UK/PNG proposed that the link between the initiatives related to the lessons and information generated by the FIP which could help to inform the development of a second 'implementation' phase of the FCPF (i.e. FIP informs what happens after Readiness).

In light of the March discussion we need to reconsider the usefulness of this document and in particular the Annex which we agreed would be removed to avoid further confusion. Other language such as in Para 3 which refers to '*providing up-front bridge financing for readiness reforms and investments identified through national REDD readiness strategy building efforts*,' is also confusing since the FIP should concentrate on piloting investments at scale leading to transformational change and readiness should be provided for by initiatives such as FCPF and UNREDD. It may be better to provide a revised diagram or very brief overview of the complementarities between initiatives.

Para 2 is focused on investments in the forest sector. We know that most of the problems for forests are outside – PNG raised the issue of alternative fuel sources. Some non-forest sector measures are covered in Para 9 and could be brought forward (or you could simply delete text to remove the repetition).

Illustrative examples of potential investments

Again, we understand that this document will be revised to present the examples of transformational action provided by participants. This will improve the note in our view - it helps to avoid the development of a check list of options. We would like to encourage innovation, and country-led and country-relevant approaches. The current text attempts to cover too much and there is a need to focus on those measures which are going to most effectively help to deliver the aims of the Programme in a sustainable and equitable manner.

Engagement of the private sector

We recognise that deciding the role of the private sector is a function for the FIP SC. However, relevant underpinning work, drawing on lessons learned from other CIF programmes and expertise held by the MDB Committee, is required to support a full FIP SC discussion on the issue. We invite the Administrative Unit to consider how to take this work forward with the MDB Committee in timely manner. The UK is happy to submit views on issues that might be addressed by this work.

In March, the UK requested that the Private Sector information note be re-presented as a summary of how private sector engagement works under the CTF (since that is what it was based on) and not how it could apply to the FIP. The note is for information only rather than for approval and we did not discuss it. We suggest that the findings of the work outlined above should draw on but replace the note.

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[FIP design document final UK comments.doc](#)

CLIMATE INVESTMENT FUNDS

March 11, 2009

**DRAFT DESIGN DOCUMENT FOR THE
FOREST INVESTMENT PROGRAM, A TARGETED PROGRAM UNDER THE SCF TRUST FUND**

I. BACKGROUND

1. There is increasing consensus that addressing climate change is central to the sustainable development, economic growth and poverty reduction agenda. Increasing the resilience to climate change needs to combine both mitigation and adaptation measures. A delay in reducing greenhouse gas (GHG) emissions would significantly constrain opportunities to achieve lower stabilization levels and is likely to increase the risk of more severe climate change impacts. Climate change impacts have the potential to reverse hard-earned development gains and progress towards achieving the Millennium Development Goals.

2. Deforestation and degradation are the second leading cause of global warming. They account for approximately 18% of global greenhouse gas (GHG) emissions and over a third of emissions from developing countries. Although there remain divergent opinions as to how deforestation and forest degradation should be included in any future climate change regime, there is an emerging consensus that this issue must be effectively addressed. Several reports indicate that tackling forest loss is a critical activity in achieving stabilization of greenhouse gas concentrations in the atmosphere at a level that avoids the worst effects of climate change.

3. A recent 2007 UNFCCC study of investment and financial flows for forestry, reported that additional global investment and financial flows are needed to address the mitigation potential of forest-related measures. Additionally, while the direct and indirect drivers of deforestation and degradation are well known, there is limited knowledge regarding the relative effectiveness of alternative approaches to reversing those drivers under different national circumstances. Despite several decades of investment in efforts to reduce deforestation and degradation, there remain few examples of rigorous impact assessment, monitoring, and evaluation that would enable specific outcomes to be associated with specific interventions. There is thus an urgent need for the design of new investments in improved forest management to incorporate an explicit learning agenda to close this knowledge gap.

4. The Bali Action Plan calls for: “consideration of policy approaches and positive incentives on issues relating to reducing emissions from deforestation and forest degradation in developing countries; and the role of conservation, sustainable management of forests and enhancement of forest carbon stocks in developing countries.”

5. Significant multilateral efforts to prepare developing countries for large scale efforts to reduce emissions from deforestation and forest degradation (REDD¹) are underway, first and foremost through the World Bank facilitated Forest Carbon Partnership Facility and the United Nations Collaborative Programme on Reducing Emissions from Deforestation and Forest Degradation in Developing Countries (UN-REDD). These and other efforts, including national and bilateral programs in some developing countries, are expected to identify large scale investment needs that will be prerequisites for the success of REDD activities on a national and global level.

6. Agenda 21 adopted at the United Nations Conference on Environment and Development (UNCED) recognized the need to strengthen forest-related national institutions, to enhance the scope and effectiveness of activities of the management, conservation and sustainable development of forests, and to effectively ensure the sustainable utilization and production of forests' goods and services in both developed and developing countries. A significant number of international and regional agreements, organizations and agencies are at the core of the forest financing architecture, with programs and projects implemented at the sub-national, national, regional and international levels. Many such programs and projects will contribute to the context and foundation for REDD initiatives by facilitating the readiness of countries to participate in REDD. Key organizations include Multilateral Development Banks (MDBs), UN, members of the Collaborative Partnership on Forests (CPF), bilateral aid programs, international NGOs, philanthropic organizations and the private sector.

7. The Strategic Climate Fund (SCF) was established to provide financing to pilot new development approaches or to scale-up activities aimed at a specific climate change challenge or sectoral response through targeted programs. An important objective of the SCF is to maximize co-benefits of sustainable development, particularly in relation to the conservation of biodiversity, natural resources ecosystem services and ecological processes. A Forest Investment Program (FIP) is to be established as a targeted program under the SCF.

8. Under the SCF the MDBs are to mobilize new and additional financing for adaptation and mitigation programs to address climate change that are country-led and designed to support sustainable and poverty reduction. Activities financed by the FIP should be based on a country-led approach and should be integrated into country-owned development strategies, consistent with the Paris Declaration.

9. The FIP will draw upon the IPCC and the IPCC Good Practice Guidance for agreed definitions and terms related to forests and climate change while recognizing the evolving vocabulary within the UNFCCC process.

¹ For purposes of the Forest Investment Program, REDD should be construed to mean activities consistent with paragraphs 1 (b) (iii) of the Bali Action Plan.

II. OBJECTIVES, PURPOSE AND SCOPE OF THE FIP

10. The main purpose of the FIP is to support developing countries' REDD-efforts, providing up-front bridge financing for readiness reforms and public and private investments identified through national REDD readiness strategy building efforts, while taking into account opportunities to help them adapt to the impacts of climate change on forests and to contribute to multiple benefits such as biodiversity conservation and rural livelihoods enhancements. The FIP will finance efforts to address the underlying causes of deforestation and forest degradation and to overcome barriers that have hindered past efforts to do so.

11. The FIP will be designed to achieve four specific objectives:

- a) To serve as a vehicle to finance large scale investments necessary for the implementation of policies and measures that emerge from inclusive multi-stakeholder REDD planning processes at the national level;
- b) To promote transformational change – that is, by combining a high degree of cross-sectoral ownership at the national level with a scale of international funding larger than is typically associated with forest finance, support change of a nature and scope sufficient to catalyze nationally significant shifts from 'business as usual' policies, practices and development paths including scaling up private sector investment, or to re-enforce ongoing progress towards conservation and sustainable use of forests, as well as resulting in globally significant reductions in forest-based emissions trajectories;
- c) To generate understanding and learning of the links between investments and outcomes – that is, by committing to apply rigorous a priori and ex post impact assessment, the FIP will ensure that the outcomes and effectiveness of FIP-supported interventions in reducing deforestation and degradation can be measured and
- d) To pilot replicable models to leverage additional and sustained financial resources for REDD – that is, to demonstrate approaches to implement REDD efforts in partnership with other sources of public and private finance to increase the volume and sustainability of support, and through this to provide valuable experience and feedback in the context of the UNFCCC deliberations on REDD.

12. In addressing the underlying causes of deforestation and degradation the FIP will support and promote, inter alia, investments in the following area:

- a) Investments in institutional capacity, forest governance and information
- b) Increasing forest benefit yields by forest resource investments
- c) Investments outside the forest sector

III. FIP PRINCIPLES

Comment [m1]: Amy: Not sure of the background to this but I'd hesitate to insert language here since we have already agreed to the text and we decided to partly deal with this issue by using case studies of transformational impact in the information note. Happy to further consider...point can be covered by investments (forest or non-forest sector) that help to address the drivers of deforestation and degradation and promote sustainable development opportunities through SFM.

12. The principles set out in the Governance Framework of the Strategic Climate Fund (SCF) apply to the FIP. In addition to the general SCF principles the following principles are important considerations for the FIP:

- a) **Climate change mitigation potential.** FIP investments should lead to significant reductions in deforestation and forest degradation and promote policies and measures for improved sustainable forest management that lead to emissions reductions and protection, maintenance and enhancement of carbon reservoirs;
- b) **National ownership and national strategies.** FIP pilot programs should be country-led and –owned, should build on, enhance and strengthen existing nationally prioritized REDD efforts, and should respect national sovereignty;
- c) **Inclusive processes and participation of all important stakeholders, including indigenous peoples and local communities.** FIP-supported programs at the country level should be designed and implemented with the full and effective participation and involvement of – and with respect for the rights of – indigenous peoples and local communities, building on existing mechanisms for collaboration and consultation. [Such participation requires transparency in all phases of the FIP process, from the development of FIP [programs and strategies], to their implementation and evaluation. All stakeholders, including indigenous peoples and local communities, and the private sector must have equal, full and timely access to information, including draft documents, prior to decision-making]. FIP-financed activities should, moreover, be based upon effective collaboration between indigenous peoples and local communities, government ministries, private sector companies and financial institutions in planning and implementing programs. FIP should also seek to engage other major stakeholders, such as major groups identified by Agenda 21;
- d) **Coordination with other REDD demonstration efforts.** The FIP should complement, be coordinated with and cooperate closely with other REDD demonstrations initiatives and ongoing REDD efforts, such as FCPF and UN-REDD. Where applicable the FIP should generate lessons for, and be informed by, other REDD initiatives on how to achieve scale and transformational impact in the implementation of REDD activities.
- e) **Measurable outcomes and results based support.** The FIP should be results based over time, and should promote measurable outcomes with regard to the effectiveness of FIP investments on REDD, livelihoods, climate resilience, biodiversity and other forest benefits. Performance measures and procedures for performance assessment should be part of the project design and should serve as a basis for course correction during the implementation;

- f) **Piloting.** The FIP should support pilot programs in order to demonstrate how to scale up public, private and other resources and activities so as to achieve transformational change;
- g) **Forest related governance.** The FIP should capitalize on the lessons learned concerning inclusive and effective governance reform and support that the co-dependent relationship between such processes and forest related climate change outcomes is promoted and strengthened;
- h) **Address drivers of deforestation and degradation and avoid perverse incentives.** FIP pilot programs must assess and address drivers of deforestation and degradation, including those outside the forest sector, and ensure a holistic national approach to REDD. Economic incentives and benefits systems should support sustainable forest practices by local forest dependent communities and, where appropriate, the private sector as well as the maintenance of ecosystem services;
- i) **Contribute to sustainable development.** The FIP should ensure that its investments make a contribution to the livelihoods and human development of forest dependent communities as well as generate biodiversity benefits and ecosystem services;
- j) **Safeguarding High Conservation Value Forests.** The FIP should safeguard High Conservation Value Forests and should not support the conversion or degradation of such forests;
- k) **Partnership with private sector.** The FIP should develop and implement models for working with, and leveraging resources from, the private sector in effective implementation of REDD investment strategies, programs and projects;
- l) **Cooperation with other actors and processes.** The FIP should complement the aims and objectives of other global environmental conventions and processes, such as the Convention on Biological Diversity, the UN Convention to Combat Desertification, the Non-Legally Binding Instrument on all Types of Forests of the UNFF, and the International Tropical Timber Agreement. It should cooperate closely with other international agencies and partnerships, such as the CPF, and with other relevant stakeholders, including IPGs, NGOs, and the private sector;
- m) **Early, integrated and consistent learning efforts.** Learning opportunities should be integrated into FIP programming from the start, including, where applicable, identification of pilot program approaches with significant potential for replication, and building in mechanisms for learning lessons from both successes and failures in collaboration with relevant stakeholders. The FIP should proactively communicate these lessons to UNFCCC and others engaged in REDD efforts. The FIP should also seek to incorporate into its activities lessons learned from other relevant initiatives.

IV. COUNTRY ELIGIBILITY

13. Country eligibility of the FIP will be based on:

- a) Official Development Assistance (ODA)-eligibility (according to the Organization for Economic Co-operation and Development/Development Assistance Committee (OECD/DAC) guidelines);
- b) An active MDB country program. For this purpose, an “active” program means where an MDB has a lending program and/or on-going policy dialogue with the country.

V. CRITERIA FOR SELECTION OF PILOT PROGRAMS

14. Transformational impact through a few programs should be prioritized over limited impact in many programs. The selection of pilot programs should be based on the following criteria:

Comment [m2]: Suggest this is removed as it is a task for the FIP SC

- a) Country or regional pilot countries should have the potential to lead to significantly reduced greenhouse gas emissions or further efforts to conserve, sustainably manage or enhance significant carbon reservoirs;
- b) Program potential to contribute to FIP objectives described above under “Section II. Objectives and Purpose of FIP”, and adherence to other principles, including sustainable development, described under “Section III. FIP Principles”;
- c) Country preparedness and ability – institutional and otherwise – to undertake REDD initiatives, taking into account government efforts to date and government willingness to move to a strategic approach to REDD and to integrate the role of forests into development;
- d) Country distribution across regions and biomes, ensuring that pilot programs generate lessons on how to go to scale with respect to immediate action to curb high rates of deforestation and degradation, maintenance of existing carbon stocks within pristine forests (high forest, low

deforestation countries), enhancement of carbon stocks on degraded forest lands and building effective capacities for sustainable forest management.

VI. FIP SUB-COMMITTEE

15. Consistent with the SCF Governance Framework, the SCF Trust Fund Committee will establish a Sub-Committee for the FIP to oversee the operations and activities of the Pilot Program.

16. It is proposed that the FIP-SC consist of:

- a) up to six representatives from contributor countries to the FIP, identified through a consultation among such contributors, and at least one of which should be a member of the SCF Trust Fund Committee;
- b) a matching number of representatives from eligible recipient countries to the FIP, selected on a regional basis and identified through consultations among such countries, at least one of which should be a Member of the SCF Trust Fund Committee. For this purpose, an eligible recipient country means any country which is eligible under Section IV above; provided, however, to the extent that any country is selected as pilot country for the FIP at the time of the selection of the representatives, any such country on the list of pilot countries shall be given priority to represent eligible recipient countries under this paragraph;
- c) [Two representatives each from indigenous peoples, NGOs, and the private sector, identified through an open and inclusive self-selection process.]

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.]

18. All pilot countries under the program, members of the MDB Committee and the Trustee may attend the FIP-SC as observers.

19. To ensure good linkages and effective cooperation with key partners so as to promote the efficient use of resources and complementarity with other sources of financing, the FIP-SC should seek advice from, and invite as active observers, representatives of other organizations with a mandate to promote forest and climate change investments, including the FAO, FCPF secretariat, the Global Environment Facility, ITTO, UNDP, UNEP, UNFCCC, UNFF, and UN-REDD technical secretariat.

[20. Civil society should also be invited to participate as active observers. Civil society representatives should be identified through an open and inclusive self-selection process. Equity and balanced representation should include consideration of gender representation, balanced representation among regions and balanced representation between international and local or national organizations.]²

Functions of the FIP-SC

21. The FIP-SC will be responsible for:

- a) agreeing upon the number of country or regional pilot programs;
- b) approving the terms of reference for, and the composition of, the expert group;
- c) approving pilot country selection criteria and guidance to be followed by the expert group.
- d) selecting pilot countries based on the recommendations of the expert group;
- e) approving programming priorities, operational criteria and financing terms and modalities for the FIP, including modalities for private sector activities;
- f) endorsing further development of activities in investment strategies for FIP financing;
- g) approving FIP financing for programs and projects;

² Provisions related to observers from civil society will need to be clarified once paragraphs 16 and 17 are agreed.

- h) ensuring complementarity between activities foreseen for the FIP and activities of developing countries, other development partners active in the field of climate change and forests, including the FCPF and other MDB efforts, UN-REDD and other UN efforts, and GEF;
- i) ensuring that the FIP program builds in provisions for evaluating the performance and effectiveness of FIP investments and for developing full reporting criteria and a performance measurement framework;
- j) periodically reviewing the effectiveness and impact of FIP programs and activities, and ensuring that “lessons learned” are applied to future FIP investments and transmitted through the SCF Trust Fund Committee to the UNFCCC and other stakeholders; and
- k) exercising such other functions as they may deem appropriate to fulfill the purposes of the FIP.

VII. EXPERT GROUP

22. An Expert Group should be established and provided with appropriate criteria and guidance by the FIP-SC to make recommendations on selection criteria for country or regional pilot programs for the FIP and associated indicators. The Expert Group will make recommendations to the FIP SC on a short-list of country or regional pilot programs.

23. The Expert Group should include individuals, acting in their personal capacities, chosen on the basis of their expertise, strategic and operational experience and diversity of perspectives, including knowledge of scientific, economic, environmental and social aspects of conservation and sustainable use of forest ecosystems and climate change, gender and forestry, private sector, governance and institutional and development planning. The Expert Group members should be selected in accordance with criteria to be approved by the FIP-SC, taking into account professional qualifications of the experts. The group should be gender balanced, include experts from both developed and developing countries, indigenous peoples and local communities, and should receive support required to fulfill their functions properly.

VIII. FIP PROGRAMMING PROCESSES³

24. Prior to convening of the Expert Group the FIP-SC should determine the number of pilot programs to be financed and criteria for country selection. Thereafter the Administrative Unit should inform eligible countries, through the country offices of the MDBs, of the pilot program and invite submission of an expression of interest to be considered as a pilot country.

25. The FIP-Sub Committee will select pilot country and regional programs taking into account the recommendations of the Expert Group.

26. For each selected country or regional pilot program the MDBs concerned, including both the public and private sector units, will organize a joint mission to support the government or group of governments to develop an investment strategy. The development of the investment strategy should be inclusive, transparent and participatory, involving sectoral ministries, development partners working in the country, including bilateral development agencies, NGOs, indigenous peoples and local communities, the private sector and other stakeholders. Investment strategies should take fully into account existing national forest-related programs and national sustainable development strategies, and build on other climate and forest funding sources and initiatives, complementing the activities supported by them and leveraging further financial support.

27. The FIP-SC and observers invited to the SC will be informed in advance of the joint mission. The outcome of the collaborative exercise will be a [draft] investment strategy, developed under the leadership of, and owned by, the recipient country, for the use of FIP resources through a joint MDB program. Investment strategies will be submitted to the FIP-SC for review and endorsement for the further development of activities in such plans for FIP financing. [Proposed investment strategies will be made publicly available in-country and on the FIP website at the same time as they are submitted to the FIP-SC, allowing sufficient time for public review and comment before FIP-SC endorsement].

28. After endorsement of the investment strategy by the FIP-SC, concepts for projects and programs will be developed by the countries into detailed proposals. In developing such proposals it should be specified whether the program or project is to be executed by national, regional, or local governments, IPGs, community based organizations, NGOs, private enterprise or other members of civil society. The processing of a program or project will follow the MDB's policies and procedures for appraisal, MDB approval and supervision [including the relevant

³ See the Annex to this document for a flowchart of the programming process.

MDB's disclosure policy]. [Proposed programs and projects will be made publicly available in-country and on the FIP website at the same time as they are submitted to the FIP-SC, allowing sufficient time for public review and comment before FIP-SC approval].

29. Pilot countries should establish, or identify an existing, cross-cutting multi-stakeholder national level steering committee to assist in program planning, implementation, monitoring and evaluation.

[IX. INDIGENOUS PEOPLES AND LOCAL COMMUNITIES DEDICATED INITIATIVE

30. The full and effective, continuous participation of indigenous peoples and local communities in the design and implementation of FIP pilot programs and national investment plans is crucial to their success, and will be highly dependent on strengthening the capacity of these groups to play an informed and active role in national REDD processes in general and FIP processes in particular, as well as on recognizing and supporting their tenure rights, forest stewardship roles, and traditional forest management systems. Specific grants should be made available to indigenous peoples and local communities as a component to each of the pilot programs.

31. The scope of activities eligible for support from a dedicated grant mechanism for indigenous peoples and local communities (and their designated support organizations) should include, inter alia, support for securing and strengthening customary land tenure and resource rights and traditional forest management systems of indigenous peoples and local communities; support for the development of pilot project proposals by indigenous peoples and local communities and their implementation; and support for the involvement of indigenous peoples and local communities in monitoring and evaluation of forest activities.

32. The operational principles and priorities, funding modalities and governance of such a grant mechanism should be developed through broad, transparent consultation with indigenous peoples and local communities (and their designated organizations) across all forest regions, and should build upon lessons learned from existing mechanisms. The terms of reference (ToR) for the development of a proposal for a dedicated mechanism will be drafted by the IP and civil society representatives selected to participate in FIP design meetings (or a subset thereof), in consultation with indigenous communities and local communities, and a qualified consultant(s) identified. A proposal will be presented to the final design meeting of the FIP-SC.]

X. MONITORING AND EVALUATION

33. Country level monitoring and evaluation should be coordinated through the multi-stakeholder national level steering committee referred to in paragraph 29.

34. The FIP-SC should report to the SCF Trust Fund Committee on results, outcomes and lessons learned of the pilot programs achieved at the programmatic, country and project level, based on the monitoring results of the MDBs and the results of the FIP-SC review of effectiveness and impact of FIP programs and activities. An independent joint evaluation of the operations of the FIP and its activities will be carried out after three years of operations by the independent evaluation departments of the MDBs. Lessons learned and results achieved through the FIP should be published and made publicly available. 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, emissions reductions achieved or emissions avoided.

Annex: Flowchart for FIP Programming

Comment [m3]: Need to be clear that the EG is producing a short list... see flow chart.

