

March 25, 2013

Comments from United Kingdom on Approval by Mail: Lao PDR: Scaling-up Participatory Sustainable Forest Management (IBRD)

Dear Team

Many apologies for the delay in submitting comments and questions from the UK on the submission by the Government of Lao PDR and IBRD of the *Scaling-Up Participatory Sustainable Management* project for FIP sub-committee approval. We would appreciate a response to points outlined below before approving the project

The project builds on lessons learnt from earlier initiatives and it is well coordinated with other activities in the sector. We welcome the efforts made to ensure adequate provisions for the active participation of women and indigenous people. The context within which the project operates however is complex, with changing institutional roles, and an evolving policy and regulatory environment. This raises a number of questions about risks. The measures proposed go some way to mitigating their impact but we highlight the following as particular areas for concern and close monitoring, and which should be developed further before final project approval.

- Consultation processes regarding the granting of concessions, with communities and also at different levels of Government. How will overlap within project areas be minimized or avoided?
- The impact that new institutional arrangements, splitting responsibilities for different forest areas, will have on coordination and decision making at different levels of Government.
- Government policy on the resettlement and consolidation of villages and its impact on indigenous people in particular.
- The risk that the reform process stalls, and/or does not deliver on expected rights and security for communities

We also seek clarification and further detail on the following project specific issues:

- A more detailed breakdown of spend under the individual components of the project to better understand the cost/ton on expected carbon emissions savings
- Clarification on the role of civil society organizations within the project's steering group structure
- Assurances that consultation processes associated with the project and FIP generally are transparent in demonstrating if participants' contributions are taken into consideration, and if not, why not?
- We would welcome further information on the Bank's policy of NOT working with villages under this project that have been relocated and/or administratively consolidated

Many thanks

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